

17 April 2019

Western Bay of Plenty District Council
Have Your Say
Class 4 Gambling Venues Policy and TAB Venues Policy
Online Feedback: <https://haveyoursay.westernbay.govt.nz/gambling-and-tab>

Online Feedback Form to be completed as follows:

Class 4 Gambling Venues Policy

What approach should we take to limiting Class 4 gaming machines ('pokies') and venues?

- Introduce a sinking lid, with no new machines or venues allowed in the District, meaning there can be no new venues or machines, and the number of machines may reduce over time.
- Reduce the cap on machine numbers to the current number of machines (154), meaning there would only be new machines/venues if an existing closed.
- Link the cap on machines to population numbers, meaning as the population grows more machines would be allowed.
- Keep the cap at 191 machines, meaning that there is capacity for new venues and up to 37 new machines.
- Other

Please provide comments if you would like to:

Gambling is a public health issue as stated in the Gambling Act 2003. Gaming machines cause more harm than any other form of gambling. The Bay of Plenty District Health Board (Bay of Plenty DHB) supports strategies that minimise gambling-related harm and inequity across the spectrum of problem gambling behaviour and recommends that Western Bay of Plenty District Council adopt a sinking lid policy to reduce gambling-related harm in the Western Bay of Plenty District.

An analysis of problem gambling in New Zealand and Australia found that there is an increase in problem gambling of nearly one person for each new machine (Storer, 2009). This study found that restricting the density of gambling machines leads to a decrease in gambling harm.

Of particular concern to the Bay of Plenty DHB is the Social Impact Assessment finding that the highest amount and percentage of district wide gaming machine proceeds come from the Te Puke/Maketu ward which is also a highly deprived community. Additional concern stems



from the finding that there is a district-wide trend that higher deprivation wards contain higher densities of gaming machines. This indicates that the harms from gambling are inequitably distributed in the community and therefore a greater burden of harm is experienced by the district's less resilient population groups. This situation should be remedied in order to fulfil Western Bay of Plenty District Council's vision that "we can *all* enjoy a healthy and safe lifestyle".

The purpose of gambling is not to raise money for the community. Gambling machine societies are required by law to allocate a minimum 40% of proceeds (the amount wagered, less the amount paid back as prizes) back to community groups and organisations, but not necessarily to the community where the money was lost. In 2015, only 27% of gaming machine spending in the Bay of Plenty was redistributed to the region by way of grants (DIA, 2017). This is an extremely inefficient method of funding organisations which provide valuable services. The money lost through gambling also comes at a very high cost to individuals, families and whānau, and the community. The Bay of Plenty DHB recognises the need to support community organisations move to alternative, more equitable, and less harmful, sources of funding.

Storer, J., Abbott, M., & Stubbs, J. (2009). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9(3), 225 – 244.

Western Bay of Plenty District Council. Social Impact Assessment of Gambling in the Western Bay of Plenty. February 2019. Accessed <https://haveyoursay.westernbay.govt.nz/gambling-and-tab/documents>

Department of Internal Affairs. Class 4 Gambling Report: January 2017. Accessed [https://www.dia.govt.nz/Pubforms.nsf/URL/DIA-Class-4-Sector-Report-2017.pdf/\\$file/DIA-Class-4-Sector-Report-2017.pdf](https://www.dia.govt.nz/Pubforms.nsf/URL/DIA-Class-4-Sector-Report-2017.pdf/$file/DIA-Class-4-Sector-Report-2017.pdf)

What approach is taken for Class 4 Gambling venue relocations (where a venue decides to close and move to a new venue)?

- Council will not allow any venue to move locations within the district
- Council will not allow any venue to move locations within the district, except in exceptional circumstances (fire damage, flood, land acquired for road construction over the site etc.)
- Council will only allow venues to move location within the district if they are moving from an area at high risk of gambling harm to an area of lower risk
- Council will allow any venue to move locations within the district
- Other

Please provide comments if you would like to:

A sinking lid policy is a district-wide ban on any new Class 4 Gambling venues or machines. To achieve a true sinking lid approach, existing licences or machines cannot be transferred or replaced elsewhere under any circumstance. This results in a natural attrition in the number of venues and machines over time.

The recent Social Impact Assessment highlights Te Puke has higher average gaming machine expenditure per machine compared with the rest of the district. In addition, the Maketu/Te Puke ward has the highest risk profile for the district due to the high numbers of gaming machines, high Māori population and high deprivation index score (Western Bay of Plenty District Council, February 2019). Bay of Plenty DHB note if Council adopt a policy to allow for relocations, a condition should be placed that any relocation must be from a more harmful (high risk profile) location to a less harmful (low risk profile) location and not the reverse.

What approach is taken for Class 4 Gambling locations? If new venues are allowed, or relocations are allowed then:

- Retain current approach
- Amend to become more prescriptive and restrictive
- I don't agree that any new venues or relocated venues should be enabled
- Other

Please provide comments if you would like to:

A sinking lid policy is a district-wide ban on any new Class 4 Gambling venues or machines. To achieve a true sinking lid approach, existing licences or machines cannot be transferred or replaced elsewhere under any circumstance. This results in a natural attrition in the number of venues and machines over time.

Allowing the relocation of pokies will not support the policy objective of decreasing the numbers of Class 4 Gambling machines or minimising gambling harm caused by Class 4 Gambling in the district.

The recent Social Impact Assessment highlights Te Puke has higher average gaming machine expenditure per machine compared with the rest of the district. In addition, the Maketu/Te Puke ward has the highest risk profile for the district due to the high numbers of gaming machines; high Māori population and high deprivation index score (Western Bay of Plenty District Council, February 2019). Bay of Plenty DHB note if Council adopt a policy to allow for relocations, a condition should be placed that any relocation must be from a more harmful (high risk profile) location to a less harmful (low risk profile) location and not the reverse.

What approach is taken for Class 4 Gambling venues that wish to merge?

- That clubs that decide to merge will no longer be allowed to have gambling machines
- Where two or more clubs wish to merge, and they previously had gaming machines, then the new merged club can retain the same number of machines as the clubs previously had, up to a maximum of 30 machines.
- Other

Please provide comments if you would like to:

Allowing the merge of gambling venues and machines will not support the policy objectives of decreasing the numbers of Class 4 Gambling machines or minimising gambling harm caused by Class 4 Gambling in communities. For example, when Te Puke Memorial RSA merged with Te Puke Citizens Club, gambling machines were moved to the Citizen's Club increasing the number of machines at one venue in Te Puke to 21. The recent Social Impact Assessment highlights Te Puke has higher average gaming machine expenditure per machine compared with the rest of the district. In addition, the Maketu/Te Puke ward has the highest risk profile for the district due to the high number s of gaming machines, high Māori population and high deprivation index score (Western Bay of Plenty District Council, February 2019).

TAB Venues Policy

What approach should be taken for stand-alone TAB venues (not part of a pub or hotel)?

- No stand-alone TAB venues will be allowed in the District
- TAB stand-alone venues are allowed in the District, subject to location provisions
- Other

Please provide comments if you would like to:

The Bay of Plenty DHB supports strategies that minimise gambling-related harm and inequality across the spectrum of problem gambling behaviour. The Bay of Plenty DHB therefore recommends that Western Bay of Plenty District Council adopts a district-wide sinking lid policy banning any new class 4 gambling venues or machines (covering and including stand-alone TAB venues) to reduce the number of class 4 gambling machines in the region.

The Bay of Plenty DHB supports no stand-alone TAB venues on the basis that Councils can only control stand-alone TAB Licenced Board venues and not TAB facilities in pubs and hotels. According to the Problem Gambling Foundation stand-alone TAB venues can allow another venue option for gaming machines (that is if a sinking lid policy wasn't in place or did not cover stand-alone TAB venues).

If you wish to provide further or more specific feedback on what you support, do not support, or changes you would like to see, please do so here:

Health begins where we live, learn, work and play. Many of the crucial underlying factors that affect the health of people and communities are directly influenced by the decisions and activities of councils. The Bay of Plenty DHB is required under legislation to improve, promote, and protect the health of people and communities; to promote the inclusion and participation in society and independence of people with disabilities; and to reduce health disparities by improving health outcomes for Māori and other population groups. For these reasons, Bay of Plenty DHB recommends that all councils adopt a sinking lid policy in order to reduce the total number of venues and machines over time with the goal of reducing gambling harm. Whereby, a sinking lid policy is a district-wide ban on any new Class 4 Gambling venues or machines. If a venue closes or merges, the machines cannot be transferred or replaced elsewhere. This results in a natural attrition in the number of venues and machines over time. It does not affect existing venues.

This submission has been prepared by Toi Te Ora which is the public health unit of the Bay of Plenty DHB.

Yours sincerely



SALLY WEBB
Board Chair