

Whangarei District Council Meeting

Agenda

Date: Tuesday, 11 June, 2019

Time: 1:00 pm

Location: Council Chamber
Forum North, Rust Avenue
Whangarei

Elected Members: Her Worship the Mayor Sheryl Mai
(Chairperson)
Cr Gavin Benney
Cr Crichton Christie
Cr Vince Cocurullo
Cr Tricia Cutforth
Cr Shelley Deeming
Cr Sue Glen
Cr Phil Halse
Cr Cherry Hermon
Cr Greg Innes
Cr Greg Martin
Cr Sharon Morgan
Cr Anna Murphy

For any queries regarding this meeting please contact
the Whangarei District Council on (09) 430-4200.

1. Karakia/Prayer
2. Declarations of Interest
3. Apologies
4. Decision Reports
 - 4.1 Class 4 Gambling Policy Hearing Agenda 1
5. Public Excluded Business
6. Closure of Meeting

4.1 Class 4 Gambling Policy Submissions

Meeting: Whangarei District Council
Date of meeting: 11 June 2018
Reporting officer: Laura Atiga-Denham (Strategic Planner)

1 Purpose

To provide Elected Members with the submissions received on the proposed Class 4 Gambling Policy and to hear submitters who wish to speak to their submissions.

2 Recommendations

That Council

1. Receives the written submissions as attached in Attachment 1 to the proposed Class 4 Gambling Policy
2. Hears submitters who wish to be heard on the proposed Class 4 Gambling Policy.

3 Background

Under the Gambling Act 2003, Whangarei District Council (Council) is required to review its Class 4 Gambling Venue Policy (the Policy) every three years.

Council commenced the statutory review process for the Class 4 Gambling Venue Policy in November 2018. Due to legislative changes in 2014, Council was required to amend the policy to align with section 97A of the Gambling Act 2003

At the 28 March 2019 Council meeting, Council completed its review of the Policy. Council decided to:

- retain the existing approach of the Policy
- reword the Policy to make compliant with the section 97A of the Gambling Act 2003
- make minor changes to make the Policy it easier to read and understand.

Council adopted the Statement of Proposal for consultation on 24 April 2019.

4 Discussion

Public consultation on the proposed Policy was open from Wednesday 1 May to Friday 31 May 2019. A total of 60 submissions were received, with 22 submitters indicating they wish to be heard.

Targeted consultation was undertaken with the following organisations:

- a) corporate societies who operate gaming machines in the Whangarei District

- b) the New Zealand Racing Board
- c) organisations representing Maori in the District
- d) venues where gaming machines are operated in the District
- e) community members and organisations who staff perceived to have an interest.

The consultation was also advertised through council libraries, Council's customer service centres, on the Council website, in Council News, and through social media.

Attachment 1 provides a list of all submitters and copies of all submissions.

4.1 Next steps

Council will deliberate on submissions received at a Council meeting on Wednesday 26 June 2019, prior to considering a final Policy.

5 Significance and engagement

The decisions or matters of this Agenda do not trigger the significance criteria outlined in Council's Significance and Engagement Policy, and the public will be informed via Agenda publication on the website, Council News, social media and in follow up communications with submitters.

6 Attachments

- 1 Submissions to the proposed policy

Class 4 Gambling Venue Policy

2019 review

Submissions

Page	Sub #	Organisation	Name	Hearing Y/N
1	29		Tania Alberts	
2	19	Alzheimers Society Northland Incorporated	Kevin Salmon	yes
3	54	Armstrong D	Delaraine Armstrong	
4	12	Bowls Northland	Paul Price/Trevor Reader	
7	45	Creative Northland	Hinurewa ta Hau	
9	2	Four Winds Foundation	Randal Godfrey	
14	1	Gaming Machine Association of New Zealand	Jarrold True/Bruce Robertson	yes
26	38	Golf Northland	John Smith	yes
28	60	Grassroots Trust Limited	Karmen McGrath	
39	34		Vanessa Hall	yes
40	63		Stephen Hansen	
41	27	Hora Hora Rugby Union Football Club Inc	Karl Milne	yes
43	8	Hora Hora School	Patrick Newman/Jan Thomas	yes
47	3	Hospitality New Zealand Northland	Kim Odendaal	
50	53		Jacqueline Howarth	
51	59	Kamo Bowling Club Inc	Carol Lesley Neeley	
52	50	Kamo High School	Cheryl Baker	
54	56	Kensington Club Inc	Maureen Parker	yes
55	47	Manaia Health PHO	Ngairae Rae	yes
61	44	Mid Northern Rugby Football Club	Dianne Holwell	
63	10	Mt. Manaia Bowling Club	Stan Terry/Pat Thompson	
65	31	Netball Northern Zone	Nicole Spratt	
67	4	New Zealand Community Trust	Tanya Piejus	
86	46	Nga Manga Puriri Northland Problem Gambling Service	Marino Murphy/Huia Orr	yes
94	24	Ngati Hine Health Trust	Te Hiwi Preston	yes
96	42	North Haven Hospice Society	Elizabeth Lee	
98	21	Northland Basketball	Joshua Port	
100	13	Northland Cricket Association	Helen Smith	
103	43	Northland Emergency Services Trust	Paul Ahlers	
105	41	Northland Football Club Incorporated	Owen Liiv	yes
107	51	Northland Golf Club	John Smith	yes
109	32	Northland Hockey Association	Grant McLeod	
111	6	Northland Multiple Sclerosis Society Incorporated	Northland Multiple Sclerosis Society	
113	61	Northland Rugby Referees Association	Llew Smart	yes
115	36	Northland Rugby Union	Alistair McGinn	yes
116	65	Northland Urban Rural Mission	Tim Nurm	yes
117	28	Onerahi Bowling Club	Graham MacKinnon/Ian Bowick	
120	15	Oxford Sports Trust Incorporated	Grant Lindsay Currie	yes
122	64	PGF Group - Problem Gambling Foundation	Paula Snowden/Eru Loach	
140	7	Pub Charity Limited	Martin Cheer	yes
165	20	Public and Population Health Unit, NDHB	Jose M Ortega/Warren Moetara	yes
172	35		Bradley Quin	
174	23		Wende Quin	
176	9		John Robertson	
177	39	Ruakaka Recreation Centre Inc	Christine Thirling	
178	66	Rugby League Northland	Phil Marsh	
179	11	Sport Northland	Brent Eastwood	yes
181	33	Squash Northland	Gaye Trimble	
183	52	Te Hau Ora O Ngapuhi	Fred Sadler	yes
185	40	Te Huinga	Huhana Lyndon	yes
187	55	The Lion Foundation	Murray Reade	
194	48	The Salvation Army Northland Regional Bridge (addiction service)	Suzanne Hay	
196	37	Tikipunga Association Football Club Incorporated	not supplied	yes
198	58	Whangarei Blue Light Ventures Inc	Marnie Reid	
200	14	Whangarei Bowling Club Incorporated	L W Roberts	
201	22	Whangarei Girls' High School	Sara Watson	
202	49	Whangarei Netball Centre	Paul Cleary	
204	57	Whangarei Tennis & Squash Club Inc	Megan Turner	
206	25		Sophia Xiao-Colley	

From: cms@wdc.govt.nz
Sent: 28 May 2019 16:32:39 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Tania Alberts - 2019-05-28

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:
 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once

From: cms@wdc.govt.nz
Sent: 27 May 2019 11:52:20 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Kevin Salmon - 2019-05-27

[Submitted by Anonymous User]

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* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
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Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

If you have supplied a valid email address, a copy of this completed form will be emailed to you. Otherwise please print a copy of it for your own records before you close this window.

Submit Button - This button will become active when all mandatory fields are filled in (fields

From: Delaraine Armstrong
Sent: 30 May 2019 13:02:46 +1200
To: Huhana Lyndon
Cc: Mail Room;Taipari Munro;janelle beazley;Deborah Harding
Subject: Re: Te Huinga Submission - Class 4 Gambling Venue Policy

Tena koe Huhana

Thankyou for responding on behalf of Te Huinga, to this important take. I tautoko the submission you have provided.

Delaraine Armstrong
Te Orewai Hapu Rep

On Thu, May 30, 2019 at 11:46 AM Pikiake Development <pikiake@gmail.com> wrote:
Kia ora

Please find attached a submission from Te Huinga on the current Class 4 Gambling Venue Review - we ask for time to speak to this issue.

Nga mihi, na

Huhana Lyndon
ph:021 0744 673

"Ma te huruhuru ka rere te manu"
Building capacity and capability

From: cms@wdc.govt.nz
Sent: 30 May 2019 17:12:51 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Trevor Reader - 2019-05-30

[Submitted by Anonymous User]

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Please enter your details:

* Full Name(s):

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 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

including the obvious physical activity, socialization, and other feel good factors that provide a sense of well being. Bowls wishes to expand and increase the participation of younger generations and groups. We need certainty of income for some of these projects. Bowls Northland wishes to ask the council to consider a cap on machines but ensure the relocation of existing machines to new facilities is permitted.

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

If you have supplied a valid email address, a copy of this completed form will be emailed to you. Otherwise please print a copy of it for your own records before you close this window.

*Submit Button - This button will become active when all mandatory fields are filled in (fields marked with *) and you click once on the button.*

All submissions are considered official information under the Local Government Official Information and Meetings Act, and may be published and/or made available to elected members and the public.

From: cms@wdc.govt.nz
Sent: 24 May 2019 10:41:42 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Paul Price - 2019-05-24

[Submitted by Anonymous User]

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Please enter your details:

* Full Name(s):

Postal Address:
 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

If you have supplied a valid email address, a copy of this completed form will be emailed to you. Otherwise please print a copy of it for your own records before you close this window.



Submission: Class 4 Gambling Venue Policy Amendments

From: Hinurewa te Hau
General Manager,
Creative Northland,
PO Box 959,
WHANGAREI 0140
Email: hinurewa@creativenorthland.com

To: Class 4 Gambling Venue Policy,
Whangarei District Council,
Private Bag 9023,
WHANGAREI 0148
Email: mailroom@wdc.govt.nz

TO WHOM IT MAY CONCERN

The ability of Oxford Sports Trust and other pokie trusts to generate funds for distribution to the community is largely dependent on the number of venues and gaming machine licences.

If WDC adopts a “sinking lid” policy within the district, this means that when a gaming venue is closed those machines are lost. Since 2003, thirteen of the original thirty-three venues have been closed and the revenue from those machines has been lost. During the same period, there has been a significant increase in the population within the Whangarei district.

Creative Northland has been a major grant recipient of Oxford Sports Trust who offer considerable financial assistance to the Community including schools, amateur sporting organisations, community service groups and the wider arts sector. Many of the projects they support would otherwise be contesting available funding from Council which, through its sinking lid policy, would restrict the opportunity for this alternative funding.

Therefore we support Oxford Sport Trust submission to Whangarei District Council that the sinking lid policy should be replaced with a cap on the number of machines set initially at the current machine numbers but with provision for additional machines and venues to be licensed in line with population growth.

Reasons:

The purpose of the pub gaming sector is to raise funds for the community. It is crucial that this fundraising system is sustainable long term. Department of Internal Affairs, Pokie Proceeds: Building Strong Communities Report says -

1. Seventy-five percent of groups surveyed in 2012 indicated their organisation is moderately or totally reliant on gaming funding to support their core business.
2. 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.
3. 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.

4. Grassroots communities are struggling with few alternative sources for funding available to replace the loss of gaming funding.
5. Voluntary organisations are increasingly reliant on nationwide public donation campaigns to stay afloat

Concern:

Many community sports, arts and other groups depend on pub gaming to survive. The reduction in gaming trust will have an impact on community organisations, with many organisations and activities ceasing to operate and others severely reduced in capacity and capability.

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

Such policies are based on the erroneous belief that limiting gaming machine numbers will limit problem gambling. In fact, despite the 30% reduction in gaming machine numbers during the past 13 years, New Zealand's problem gambling rate has remained consistently low at around 0.3% to 0.7% of the population. The New Zealand 2012 Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006."¹

Consideration:

We ask Whangarei District Council to review the purpose of the NZ gambling legislation before any further policy change is made to ensure that money from gambling benefits the community as our current system is set up to ensure some of those harms are mitigated by pokie proceeds returning to the community and being used for good causes.

We believe this can be achieved by venues being regulated and operated properly by responsible societies and venues, pokies who provide a valuable source of funding for community groups.

Nga mihi



Hinurewa te Hau (Hinū)

**General Manager
Creative Northland**

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



Submission on Whangerei District Council Gambling Venue Policy

Introduction

Four Winds Foundation Limited is a national gaming trust. We have the following venues in Whangerei District Council:

- Ruakaka Tavern, Ruakaka

Four Winds asks that the Whangerei District Council:

- Expands the current relocation provision to enable venues to move to new, modern premises, beyond lease expiry, public works acquisition, and site redevelopment. The relocation provision should also allow venues to move to buildings that have a higher earthquake rating, to new, modern premises, and also if the landlord is imposing unreasonable commercial terms.
- Replace the existing sinking lid with a cap at current numbers (19 venues and 274 machines)

I do not wish to speak at the upcoming oral hearing.

Expanding the Existing Venue Relocation Provision

The existing relocation policy only allows venues to relocate due to circumstances beyond the control of the business owner, such as natural disaster, fire, lease termination, or public works acquisition.

The relocation provision should be expanded to enable venues to move when they wish to move to newer, more modern premises; to move to premises with a higher earthquake rating; and to move when the landlord is demanding unreasonable terms.

Expanding the relocation provision would enable venues to move from large, rundown premises to new, modern, smaller premises. It is common following relocation for the relocated venue to have a more upmarket offering, a greater focus on food, and a more affluent clientele. This is positive from a gambling harm minimisation perspective and should be encouraged. Having, new, modern, attractive venues is also positive as it revitalises business districts, making the hospitality precincts more desirable locations for both local residents and visitors to the district.

Expanding the relocation provision would enable venues to move out of buildings that have poor earthquake ratings, to stronger buildings that have a higher earthquake rating. This is a health and safety issue. Council should be supportive of its residents socialising and working in buildings that are safe; not entrenching them in high risk locations.

It is common for taverns and clubs to be located on large blocks of land. An expanded relocation provision would enable taverns and clubs to move to smaller premises, thereby freeing up large sections of land for better purposes such as high-density affordable housing.

An expanded relocation provision would also prevent landlords extracting unreasonable rentals and imposing draconian terms, as the tenant would be freely able to relocate their full business offering.

Retaining the current restrictive relocation policy will entrench existing venues in old, rundown, large, and possibly unsafe premises.

Gaming Machine Cap

The sinking lid should be replaced with a cap of 274 machines and 19 gaming venues to allow a small number of additional gaming venues to be established.

Gaming machines in New Zealand exist for the sole purpose of community fundraising. One hundred percent of the profits from the gaming machines owned by societies such as Four Winds are returned to the community via grants. The funding is significant.

The grant funding is entirely dependent on local hospitality venues being able to host gaming machines. A restrictive policy that results in decreasing numbers of gaming venues removes the community fundraising infrastructure, and will ultimately result in the loss of a valuable funding source.

In order to ensure that the community funding remains sustainable, the policy should allow for a small number of additional venues to be established as Whangerei District grows; or at the very least, for the current number of gaming venues to remain.

Evidenced-Based Decision Making

Four Winds asks that the emotion and politics be taken out of the policy review and a decision on the future of the policy be made based on the evidence. The following table separates the fact from fiction.

Fiction	Fact
Gaming trusts target Maori and Pacific Island People in poor areas.	Areas such as Thames Coromandel, McKenzie District and Waitomo have traditionally had a higher gaming machine density than Manukau or Porirua.
Gaming machines are designed to be addictive.	The allegation that gaming machines are designed to be addictive was recently tested in the Australian Federal Court in the case <i>Guy v Crown Melbourne Ltd</i> . The Court found that there was no evidence that gaming machines are designed to be addictive. In fact, all aspects of the machines, including items such as how fast the reels may spin, are highly regulated and controlled.

<p>Problem gambling services are stretched and underfunded</p>	<p>Problem gambling services are extremely well funded in New Zealand. The gambling industry funds the treatment services via the problem gambling levy. This fund generates \$20 million each year.</p>
<p>One new gaming machine results in one new problem gambler.</p>	<p>Not in New Zealand. The study that made this suggestion was an Australian study. When you look at the New Zealand data in isolation, there is no direct link between gaming machine numbers and problem gamblers.</p>
<p>40% of gaming machine revenue is generated from problem gamblers.</p>	<p>The 40% figure comes from a 2010 Australian Government Productivity Commission Report. The 2011 paper that reviewed this finding suggested that the spending by problem gamblers was in fact between 10% and 20%.</p>
<p>Problem gambling is a major problem in New Zealand</p>	<p>No one wants problem gambling. The industry works hard to prevent and mitigate the harm from problem gambling. In fact, New Zealand has one of the lowest problem gambling rates in the world (0.2% of the adult population).</p>
<p>More gaming machines will mean more problem gambling.</p>	<p>It is not as simple as more machines means more problem gambling. When gaming machine numbers have gone up, the problem gambling rate has not increased. When gaming machine numbers have dropped, the problem gambling rate has stayed the same.</p>
<p>Gaming machines have a negative economic impact.</p>	<p>In addition to the community grants, the gaming machine industry in New Zealand is a major employer and provides significant funds to the Government by way of taxation revenue. The sector has an overall positive economic benefit.</p>
<p>Problem gamblers won't migrate to online gambling.</p>	<p>New Zealanders gambled \$300 million with offshore online providers in 2017. The TAB's online market is now 59.2% of all turnover. The online gambling spend is growing annually at between 12% and 20%.</p>

Online Gambling

It is lawful to participate in online gambling in New Zealand. All the gaming machine games currently available at the local venues can be easily found and quickly played online.

There is no question that New Zealanders love gambling online. The Lotteries Commission reported in its 2016/17 Annual Report that online sales accounted for 13 per cent of its total sales, compared with 10 per cent the previous year. The New Zealand Racing Board noted in its latest six-monthly report that online channels made up 59.2 per cent of its betting turnover, up 2.2 percentage points on last year. It also said that its online platforms were the fastest-growing channels.

A September 2018 Cabinet paper on online gambling cites research suggesting that New Zealanders have gambled approximately \$300 million with offshore providers in 2017, with the market growing annually at between 12 and 20 per cent.

The Cabinet paper notes that health professionals and gambling harm treatment providers have expressed concern that online gambling may be more harmful than some existing forms of gambling. The paper continues by stating **"It [online gambling] has the potential to drive changes in behaviour to a greater, and more harmful, extent than some land-based gambling."**

Adopting a restrictive gambling venue policy will accelerate the migration of the gambling spend to online providers. The offshore-based online providers do not make any community grants, do not create any local employment, do not pay any taxes to the New Zealand Government, do not contribute to the cost of providing the local problem gambling treatment services, and operate in an unregulated space driven entirely by profit without regard to harm prevention and minimisation.

Randal Godfrey
General Manager, Four Winds Foundation

randal@fourwindsfoundation.co.nz

Mobile: 021 864 711

The Gaming Machine Association of New Zealand's Submission on Whangarei District's Gambling Venue Policy



Contact Persons:

Bruce Robertson

Independent Chair

Gaming Machine Association of NZ

hospoboss@gmail.com

027 4400 650

Jarrold True

Counsel

Gaming Machine Association of NZ

jarrod.true@truelegal.co.nz

027 452 7763

The Gaming Machine Association of New Zealand's Submission on Whangarei District's Gambling Venue Policy

Introduction

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

Summary

2. The Association asks council to:
 - Replace the sinking lid with a cap of 274 gaming machines (the number of gaming machines currently operating); and
 - Expand the relocation provision to enable venues to move to new, modern premises, to move to buildings that have a higher earthquake rating, and to move if the current landlord is imposing unreasonable terms.

Gaming Machine Funding

3. 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. Approximately \$300 million¹ in grants are made each year from non-casino gaming machines. In addition to the external grants, clubs such as RSAs and Workingmen's Clubs receive approximately \$50 million each year in gaming proceeds to assist with meeting the clubs' operating costs. This funding is crucial.
4. The total authorised purpose funding (including the non-published club authorised purpose payments) received from Whangarei District-based venues is over \$6.7 million annually. Examples of recent grants include:

\$10,000.00 to Blue Light Whangarei



¹ <http://www.gamblinglaw.co.nz/download/Gambits/DIA-Class-4-Sector-Report-2017.pdf>

\$10,000.00 to Whangarei Budgeting Service



\$4,226.00 to Kamo High School



\$7,042.00 to Northland Paraplegic & Physically Disabled Assn



\$1,700.00 to Kamo Intermediate



\$12,000.00 to Northland Rugby Union



\$2,000.00 to Whangarei Academy of Gymnastics



\$4,212.00 to Northland Badminton Association



5. The total grants amount quoted by the Problem Gambling Foundation is less than the \$6.7 million stated above, as the Problem Gambling Foundation's data is gathered from society websites, and not all societies publish their authorised purpose payments. The funds applied and distributed by club societies, for example, are not published. Further, if the grant recipient's name does not indicate that it is located within the territorial authority, the amount of that grant is not included in the Problem Gambling Foundation's figures.

Revenue Breakdown

6. The return to players on a non-casino gaming machine is required to be set between 78% and 92%, with most being set at 91.5%. On average, for every \$1.00 gambled, 91.5 cents is returned to the player in winnings. The money retained is typically allocated as follows:

Typical Distribution of Gaming Machine Profits

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	1.31%	1.5%
Department of Internal Affairs' Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.31%	2.66%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.83%	43.5%

Gaming Machines – Key Facts

7. 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 31 years ago.
8. Gambling is a popular form of entertainment that most New Zealanders participate in. The New Zealand National Gambling Study: Wave 4 (2015)² found that 75% of adult New Zealanders had participated in some form of gambling in the previous 12 months.
9. Gaming machine numbers are in natural decline. In 2003, New Zealand had 25,221 gaming machines. In December 2018, New Zealand had 15,257 gaming machines. In 2003, the Whangarei District had 35 venues and 373 gaming machines. The district currently only has 19 venues and 274 gaming machines (a 46% reduction in venue numbers).
10. New Zealand has a very low problem gambling rate by international standards. The New Zealand National Gambling Study: Wave 4 (2015)³ found the problem gambling rate was 0.2% of people aged 18 years and over. The problem gambling rate is for all forms of gambling, not just gaming machine gambling.
11. All gaming machine societies contribute to a problem gambling fund. This fund provides approximately \$20m 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.
12. 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).

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

³ <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-6-aug18.pdf>

Existing Gaming Machine Safeguards

13. The introduction of a cap is appropriate given the significant measures that are already in place to minimise the harm from gaming machines.
14. 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.
15. There is a statutory age limit that prohibits persons under 18 years of age playing gaming machines.
16. 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.
17. 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.
18. Gaming machines in New Zealand do not accept banknotes above \$20 in denomination.
19. ATMs are excluded from all gaming rooms.
20. All gaming venues have a harm minimisation policy.
21. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
22. 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.
23. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
24. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
25. It is not permissible for a player to play two gaming machines at once.
26. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
27. 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).

28. It is not permissible to use the word “jackpot” or any similar word in advertising that is visible from outside a venue.

A Cap is Reasonable

29. Replacing the sinking lid with a cap at current numbers is reasonable. 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).
30. The 2012 National Gambling Survey⁴ 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.

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

32. 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:

⁴ http://www.health.govt.nz/system/files/documents/pages/national_gambling_study_report_2.pdf

⁵ <http://www.health.govt.nz/system/files/documents/pages/national-gambling-study-final-report-report-no.5.pdf>

EGM reductions and the introduction of caps generally appear to have little impact (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).

33. The current sinking lid is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups in the Whangarei 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

34. 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.



35. 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.
36. SkyCity announced on 11 March 2019 that it would launch an offshore-based online casino by the end of 2019.
37. Offshore-based online gambling, however, 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.

38. The Problem Gambling Foundation shares our concern with the growth of online gambling. Below are some extracts from the Problem Gambling Foundation's media platforms:



PGF Services (Problem Gambling Foundation) @PGFNZ · 3 Sep 2018



Our CEO, Paula Snowden was on @1NewsNZ last night talking about the similarities between online gaming and gambling.
#gamblingharmawarenessweek #GHAW2018 #PausethePokies



PGF Services (Problem Gambling Foundation) @PGFNZ · 21 Jan 2018



Paula was just on @ThePanelRNZ talking about the growing problem of online gambling and their ads on TV. Just like many parents, we are concerned that these ads normalise gambling for young children. radionz.co.nz/national/progr...



PGF Services (Problem Gambling Foundation) @PGFNZ · 3 Jul 2018



#Hottopic! Teenagers have been lured into under-aged casino-style #gambling through their video #gaming, an investigation has revealed #skins



PGF Services (Problem Gambling Foundation) @PGFNZ · Feb 25



She discovered a South African website that would let her #gamble from home. When she wasn't online they would call her to encourage her to log on: "I'd say... that I didn't have any money & they would... give me some free credits and it would start again"



PGF Services (Problem Gambling Foundation) @PGFNZ · 24 May 2018 ✓
 Shout out to @TheSpinoffTV for their investigation into Gibraltar-based online casino Jackpot City, and to Minister Tracey Martin for pledging to crackdown on offshore casinos that exploit Kiwi gamblers.



PGF Services (Problem Gambling Foundation) @PGFNZ · 19 Nov 2018 ✓
 Any sports fan is all too familiar with micro-bets & the problems they cause. These bets on small events during live-play have been linked to sporting corruption & now there is evidence that this type of betting is very strongly linked to [#harmfulgambling](#)



Micro-betting: a dangerous form of gambling luring in vulnerable Au...

New research has found that more than a third of Australian sports gamblers are making micro-bets using offshore operators. And this type of betting is ...
theconversation.com

39. If a reduction in gaming machines only redirects gamblers to offshore-based internet gambling, there is no harm minimisation advantage in that strategy. In addition, there are further disadvantages in the fact that no community funding is generated for New Zealanders, no tax revenue is generated for the New Zealand Government and no contributions are made via the New Zealand problem gambling levy.

Expanding the Relocation Provision

40. It is submitted that the relocation provision should be not be limited to “circumstances beyond the control of the owner” such as lease expiry, public works acquisition, and site redevelopment.
41. The relocation policy should enable relocation when a venue wishes to move out of an earthquake-prone building. This is a health and safety issue.
42. The relocation policy should be flexible enough to support businesses that wish 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.

43. 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

44. The relocation policy should enable venues to move to smaller, more suitable premises. Enabling venues to move away from large premises, with large car parking areas, to newer, smaller premises also has the advantage of freeing up large sections of land, which may be better used for affordable high-density housing.
45. It would also be reasonable to also allow venues to relocate when the move is due to onerous rental sums or lease terms being imposed. 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 more flexible relocation prevents landlords demanding unreasonable rentals as it gives the venue operator the ability to relocate to an alternative venue.
46. 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.

Oral Hearing

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

15 May 2019

Bruce Robertson

Independent Chair

Gaming Machine Association of NZ

hospoboss@gmail.com

027 4400 650

Jarrod True

Counsel

Gaming Machine Association of NZ

jarrod.true@truelegal.co.nz

027 452 7763

gmanz.org.nz



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s):	John		
Last name:	Smith		
Postal address:	12 Nixon St.		
Best daytime phone number:	09 4377215	Mobile:	0274889906
Email:	johnasmith48@gmail.com		
I am writing this submission	<input checked="" type="checkbox"/> (✓ box)	<input type="checkbox"/> as an individual	<input checked="" type="checkbox"/> on behalf of an organisation
Organisation name:	Golf Northland		

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 (✓ box) Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

Be sure to get your written comments to us by **5.00pm on Friday 31 May**. Follow the instructions and provide your comments on the next page.

How to register and/or get this form to us

IN PERSON:

By visiting Customer Service desks at either: Forum North, Rust Ave, Whangarei, or Ruakaka Service Centre, Takutai Place, Ruakaka

or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz

Points to remember when making a submission

Please print clearly. The form should be easy to read and be understood, and may need to be photocopied.

We will respond in writing to every submission received. Please ensure that you provide appropriate contact details for this. Emails are our preferred form of communication.

All submissions are considered public under the Local Government Official Information and Meetings Act 1987, and may be published and made available to elected members and the public.

Your submission will not be returned to you once it is lodged with Council. Please keep a copy for your reference.

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy below:

Submission on behalf of GOLF NORTHLAND inc. on the Draft Class 4 Gambling Venue Policy.

Golf Northland is very reliant on funds granted to us from Community Trusts. These derive their funding from the revenue received through proceeds from venues supporting poker machines.

We have noted that it is becoming harder to access these funds as the moneys available have diminished due in part to the sinking lid policy adopted by the council.

We use funds from grant sources to assist with the following functions to develop golf as a sport in the community across Northland: # Assist with funding of a Golf Development Officer charged with introducing golf to schools, participating in community sport days, and creating a development plan that reflects the needs of all golf clubs in Northland. # Supporting the travel of our representative teams to National interprovincial tournaments at all age and group levels.

We believe that should the council persist in their aim of reducing machines it will impact hugely, not only on us at Golf Northland, but on all aspects of Northlands leisure community. It is most likely to lead to a user pays society which will impact negatively on a large proportion of Northlands population.

Therefore, Golf Northland wishes to support a cap on venues which will ensure that the current funding level of distribution to the local community is sustained.

We would like to suggest that within council policy provision be added to allow additional venues be added in line with future population growth of the district.



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s):	Karmen		
Last name:	McGrath		
Postal address:	PO Box 9019		
	Hamilton		
Best daytime phone number:	07 847 0312	Mobile:	021 880 120
Email:	karmen@maxserv.co.nz		
I am writing this submission	(✓ box) <input type="checkbox"/> as an individual <input checked="" type="checkbox"/> on behalf of an organisation		
Organisation name:	Grassroots Trust Limited		

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 (✓ box) Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

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ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz

Whangarei District Council

Private Bag 9023

Whangarei 0148

Email: mailroom@wdc.govt.nz**Class 4 Gambling Venue Policy Review – Submission****Introduction**

Grassroots Trust is supportive of positive legislation changes within the industry and all efforts to further minimise harm that is caused from gambling.

Grassroots Trust has reviewed the Whangarei District Council's Statement of Proposal and would like to confirm their position on changes proposed below:

1. Whether New Venues can be Established in the Whangarei District?

Council proposes retaining the current 'sinking lid' regime effectively supporting a gradual reduction of Class 4 venues and machines in the district over time. The Whangarei District currently has 19 venues and 274 gaming machines operating within the district as detailed in The Department of Internal Affairs statistical reports released on the 31st March 2019.

Continuing with a 'sinking lid' regime will only result in a reduction of funds available to sport, education and community sectors over time, from Class 4 societies such as Grassroots Trust operating in the Whangarei District.

*Grassroots Trust **DOES NOT SUPPORT** council's intention to retain the 'Sinking Lid' policy in the current Class 4 Gambling Venue Policy.*

*Grassroots Trust **SUPPORTS** and requests Council consider **replacing the current policy provision with a 'Capped' provision at the current numbers (19 Venues and 274 Gaming Machines).***

2. Allowing Relocations?

The Whangarei District currently allows venue relocations to occur as long as provisions within the current policy regarding restrictions are met.

Permitting venues to relocate can have some harm minimisation benefits such as venues relocating to more desirable locations within the Whangarei District. Other positive effects for the Whangarei District include that newly developed venues tend to be smaller, modern, vibrant premises that create and promote a positive entertainment precinct, support the local economy and in some areas encourage tourism.

*Grassroots Trust **SUPPORTS** Council's intention to retain the current provisions of the policy however requests Council to consider **expanding their provisions to include the following:***

- a. Allowing venues to move to buildings that have a higher earthquake rating;*
- b. Allowing venues to move to new premises;*
- c. Allowing venues to relocate to more modern premises; and*
- d. Allowing venues to relocate should landlords impose unreasonable terms.*

Grassroots Trust would like to take this opportunity to highlight the positive contributions that the Trust has been able to make over the last year to the Whangarei District, but also reiterate some facts around Problem Gambling and Harm Prevention & Minimisation practices.

About Grassroots Trust

Grassroots Trust is Class 4 Gaming Society licensed under the Gambling Act 2003 that generates funding for the community through the supply and operation of gaming machines in bars and pubs. Based in Hamilton, Grassroots Trust is one of the primary gaming societies and currently operates gaming machines at 55 Class 4 Venues across the Waikato, Bay of Plenty, Auckland, Northland and Hawkes' Bay Regions. Within the Whangarei District, Grassroots Trust operates at one venue, the Kamo Hotel, operating 18 gaming machines.

The Grassroots Trust Board of Directors are Chairman, Martin Bradley (Lawyer); and Directors, Kevin Burgess (Pharmacist); Craig Sanders (Accountant); Jeremy O'Rourke (Managing Director); Tracey Gunn (Barrister); Gary Troup, ONZM (Company Director) and Fraser Lellman (Accountant).

Grant Funding

Grassroots Trust is required to return a minimum **40%** of gross proceeds to authorised purposes and it is Grassroots Trust's intention to distribute these funds back to the community that it was generated; across the sport, community and education sectors. Class 4 Gaming venues enable extremely valuable funding to be provided to a large range of local community groups. Class 4 Gaming societies are the only gambling operators that focus on supporting grassroots community organisations. The funding turnaround is quick, with grant decisions being made monthly. The application process for community groups is simple and can be completed online via our website.

Many organisations throughout New Zealand including the Whangarei District have benefited from a Grassroots Trust grant. In the period 1 September 2018 to 31 March 2019, Grassroots Trust made **\$271,566.58 in grants to organisations based in the Whangarei District** – see full list attached to this submission.

Some of the community organisations in the Whangarei District that have benefited from funding from Grassroots Trust include:



Northland Cricket Association Incorporated

The Northland Cricket Association promotes, organises, supports and administers the amateur game of cricket in Northland. Grassroots Trust shares Northland Cricket's passion and enthusiasm for amateur sport; having provided **\$64,375** toward new cricket balls, replacement sports netting and the repair and replacement of wicket covers. Additionally, in May 2019, the Grassroots Trust Board further contributed **\$30,000** toward purchasing a new vehicle and trailer to transport all junior, senior, club and school cricket teams to competitions across the North Island.



Whangarei Boys' High School

Whangarei Boys' High School is a decile 5 school with 1250 students who come from all over Northland. As the only Boys' School and the oldest school in Northland (137 years old), they have a strong focus on sports and boys being active. Grassroots Trust supports this philosophy and recently provided **\$100,000** in funding towards the resurfacing of their courts with an all-weather surface, making them usable all year round for both community and school use.



Literacy Whangarei Inc

Literacy Whangarei serves the wider Whangarei District and provides literacy and numeracy programmes to adult learners. Their community learning centres cover the wider Whangarei District which allows them to deliver programs specific to the needs of each community. The areas they cover include Otangarei, Ngunguru, Whananaki, Hikurangi, Kamo, Ruakaka, Raumanga and Central Whangarei. Grassroots Trust recently supported Literacy Whangarei Inc. by providing essential funding toward their Manager and Administrator salary costs of **\$6,200**.



Sport Northland

Sport Northland serves a population of over 168,000 people that includes a region with three district councils, one regional council, 34 secondary schools, 132 primary schools, 46 regional sports organisations and over 600 sport and recreation clubs. Grassroots Trust recently showed their support of Sport Northland by providing funding of **\$20,000** toward the salary of their Youth Connector. The Youth Connector's role is to work with providers to design and deliver quality sport experiences that young people want and value.

No other gambling provider provides this level of support for grassroots organisations. Funding received by community organisations is critical to their ongoing sustainability. The Lottery Grants Board makes a small number of large grants to large organisations. The New Zealand Racing Board predominately uses the funds from race and sports betting to support the racing industry. The profits from the six commercial casinos are paid out to their commercial shareholders (save for a token amount in community grants). No grant money is paid by offshore-based online gambling providers.

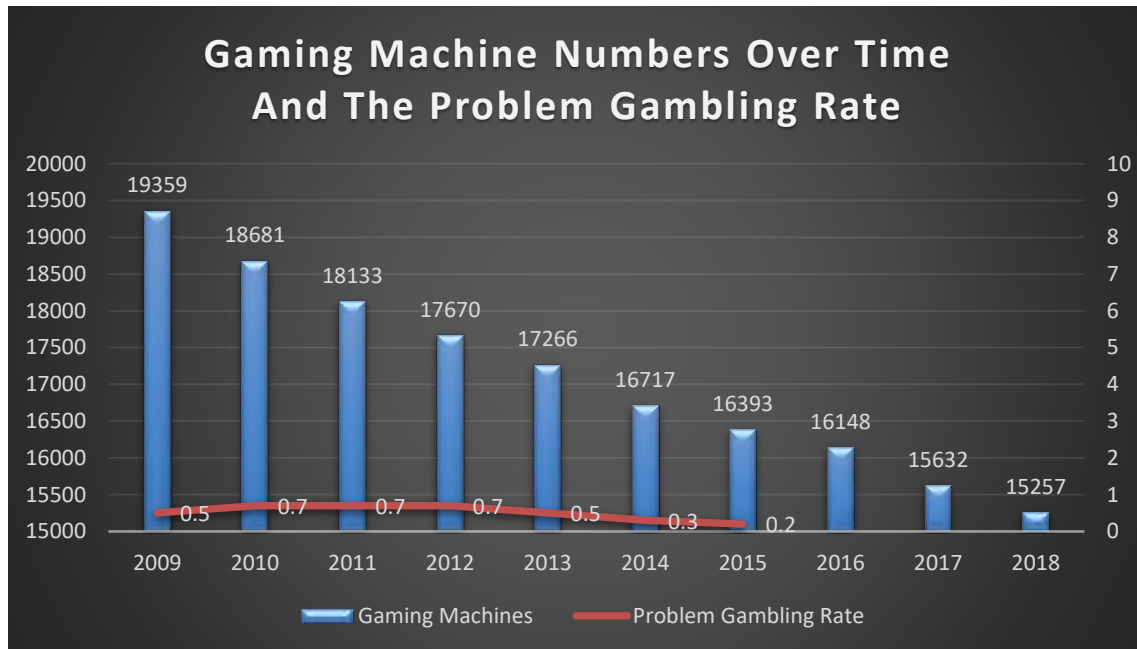
In 2012, Auckland Council commissioned a community funding survey. The survey data is summarised in the report *Community Funding: A Focus on Gaming Grants*.¹ The report confirms how essential gaming machine funding is to a very large number of grassroots organisations and how extremely difficult it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

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

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

Machine Numbers and Gambling Harm

Over the last ten years gaming machine numbers have reduced considerably, but the problem gambling rate has continued to plateau. Reducing machine numbers has been tried as a tool to address gambling-related harm but it has not worked as there is no link between gaming machine numbers and harm caused. The graph below shows the dramatic reduction in gaming machine numbers over the last ten years and the corresponding flat problem gambling rate.



Reducing venues and machine numbers merely reduces community funding and accelerates the migration of gambling to online providers where there is zero return to the community.

There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last ten years, the problem gambling rate has remained the same, despite gaming machine numbers declining rapidly (4,621 gaming machines have been removed from the market between March 2009 and March 2019).

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

The 2012 National Gambling Survey concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report confirmed how essential gaming machine funding is to a very large number of community organisations and how extremely difficult it would be for such funding to be obtained from alternative sources. The report stated on pages 17 and 18:

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

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

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

More Help Seeking Does Not Necessarily Mean More Problem Gambling

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

- A change in society’s attitude towards seeking counselling services and seeking help. People are these days more aware of the services available to them and are more inclined to seek help;
- The general economic decline. A sharp increase in help seeking experienced in the period from 2008 to 2011 corresponds with the global financial crisis. A reduction in disposable income tends to bring any gambling loss to the fore;
- A corresponding increase in television, radio and newspaper advertising by treatment providers has allowed gamblers to be more aware of the counselling services offered.

Harm Prevention & Minimisation - Support & Systems

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

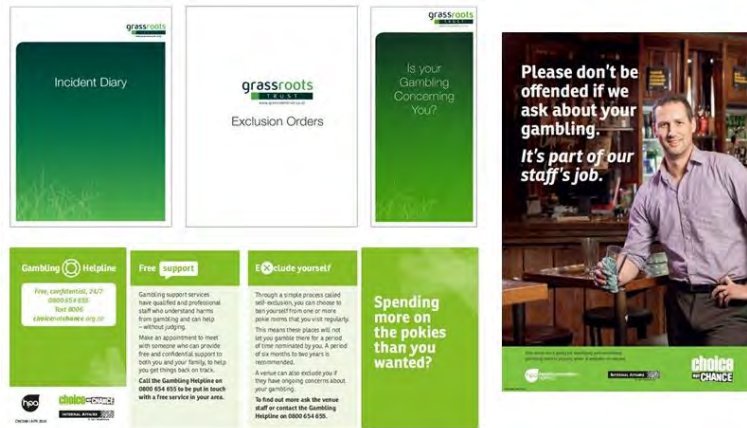
There is already a regulatory requirement for staff and managers of Class 4 gaming venues to be trained in how to monitor and recognise problem gamblers; and how to intervene appropriately to ensure that they seek help and support for their problem. This, in our view, is the most effective way of helping the very small proportion of people who have a problem to manage that, whilst leaving the greatest proportion of people to fulfil their legitimate desire to gamble responsibly.

Grassroots Trust provides significant funding to the Ministry of Health through an annual Problem Gambling Levy. This funding assists problem gambling support services in the Whangarei District, including the Problem Gambling Foundation, the Salvation Army Oasis Centre and the Gambling Helpline.

Grassroots Trust provides significant on-going training to venue management and staff on how to identify and support problem gamblers. Dedicated field staff are available at any time to provide Harm Prevention & Minimisation Training and support to venue management and staff. We also provide the following resources to venues:

- Grassroots Trust Venue Harm Minimisation Policy;
- Full Health Promotion Agency Gamble Host Packs including Quick Reference Guides to help identify Problem Gamblers, Posters and Training Tips;
- Problem Gambling Pamphlets;
- Incident Diary to record any problem gambling observations and action;
- Exclusion Order Books and an Exclusion Order process;
- Signage to display in and around the gaming room.

Example Venue Resources to assist with problem gambling provided by Grassroots Trust



Grassroots Trust and our venues also fully support the Multi-venue Exclusion (MVE) Program which currently operates across New Zealand; providing Problem Gamblers with the option to exclude themselves from multiple venues at once.

Grassroots Trust also supports the recent initiative by the Ministry of Health to trial a National Database administered by The Salvation Army Oasis.

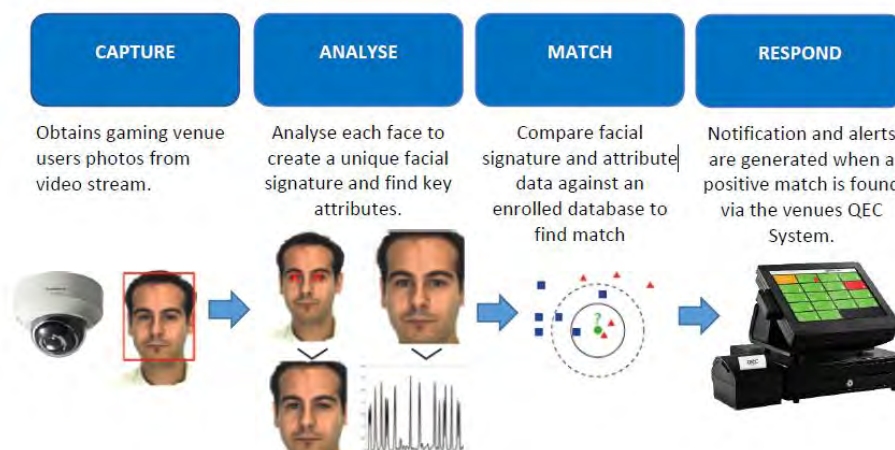
Harm Prevention & Minimisation Technology - Facial Recognition

Grassroots Trust is a big believer in staying up to date with the latest technology offered in the industry. Recently the industry has seen the introduction of Facial Recognition.

Enhancing further our commitment to providing a *Culture of Care* at venues; Grassroots Trust is now rolling out the use of Facial Recognition at venues. This software known as “The Guardian” is a fully integrated solution for recognising registered problem gamblers as they enter and move around a gaming venue. Although the product is cost prohibitive; Grassroots Trust will continue to consider installation at partnered venues with high turnover and high numbers of exclusion rates in the future.

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

The Guardian – Four Very Simple Steps



Unintended Consequences – Increase in Internet and Mobile Phone Gambling

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

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



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

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

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

Conclusion

As noted in our introduction, Grassroots Trust is supportive of positive legislation changes within the industry and all efforts to further minimise harm that is caused from gaming. Grassroots Trust does not however support Council's intent to continue with the current 'sinking lid' regime and would like the council to move to a 'capped' provision ensuring that sport, education and community organisations continue to receive valuable support that they required.

Grassroots Trust would also like to see Council's support in expanding on the relocation provisions in the current policy, allowing more scope that may lead to a potential relocation which in turn may also benefit the Whangarei District, including benefiting Harm Minimisation.

Kind regards

On behalf of the Grassroots Trust Board of Directors



Martin Bradley
Chairman

Grassroots Trust Limited

Approved Grants - Whangarei District

Reporting period: 1 September 2018 to 31 March 2019



Between the period 1 September 2018 to 31 March 2019, Grassroots Trust contributed **\$271,566.58** to sport, education and community groups within Whakatane District. Below is a breakdown of these very worthwhile causes:

Approval date	App No.	Organisation name	Category	Compliance Description	Approved amount
26/09/2018	GR10950	Northland Golf Club Incorporated	Sports	Funding towards the costs associated with purchasing wetting agents and fertiliser	\$8,000.00
24/10/2018	GR11490	Maungakaremea Primary School	Education	Funding towards equipment for the school caretaker	\$10,652.17
28/11/2018	GR11365	Literacy Whangarei Inc	Community	Funding towards the salary costs of the Manager and Administrator from 4 December 2018 to 5 December 2019	\$6,200.00
28/11/2018	GR11711	Mitamitaga Ole Pasefika Va'a-Alo Canoe Club Incorporated	Sports	Funding towards the costs associated with purchasing junior race singlets	\$6,382.50
28/11/2018	GR11999	Northland Cricket Association Incorporated	Sports	Funding towards the costs associated with new cricket balls	\$10,500.00
28/11/2018	GR11758	Northland Cricket Association Incorporated	Sports	Funding towards the costs associated with repair and replacement of wicket covers	\$8,875.00
28/11/2018	GR11612	Sport Northland	Sports	Funding towards the salary costs of the Youth Connector from 1 December 2018 to 9 April 2019	\$20,000.00
19/12/2018	GR12187	Alzheimers Society Northland Incorporated	Community	Funding towards the salary costs of the Community Advisor from 1 January to 15 February 2019	\$3,840.00
19/12/2018	GR12404	CCS Disability Action Northland Incorporated	Community	Funding towards the costs associated with maintenance and removal of trees	\$2,700.00
19/12/2018	GR11970	Onerahi Primary School	Education	Funding towards the costs associated with attending a school camp from 27 – 29 March 2019	\$5,319.13
19/12/2018	GR12199	Whananaki School	Education	Funding towards the costs associated with purchasing an outdoor motor and life jackets	\$1,733.51
23/01/2019	GR12458	Coastguard Northern Region Incorporated	Community	Funding towards the costs associated with purchasing boat electronics	\$15,138.00
23/01/2019	GR12486	Northland Basketball Incorporated	Sports	Funding towards vehicle lease from 1 February 2019 to 1 February 2020	\$7,797.36
23/01/2019	GR12581	Whangarei Blue Light Ventures Incorporated	Community	Funding towards the costs associated with attending a Blue Light Life Skills Camp from 8 - 12 April 2019	\$2,173.91
23/01/2019	GR12575	Whangarei Boys' High School	Education	Funding towards the costs associated with resurfacing courts	\$100,000.00
27/02/2019	GR13052	Kamo Rugby and Squash Club Incorporated	Sports	Funding towards the costs associated with purchasing rugby shorts	\$8,790.00
27/02/2019	GR12779	Maungakaremea Cricket Club Incorporated	Sports	Funding towards the costs associated with coaching from 1 – 31 March 2019	\$2,170.00

27/03/2019	GR13390	Mangapai Hockey Club Incorporated	Sports	Funding towards the costs associated with purchasing goalie equipment	\$3,795.00
27/03/2019	GR13362	Northland Cricket Association Incorporated	Sports	Funding towards the costs associated with replacement sports netting	\$45,000.00
27/03/2019	GR13137	The Royal New Zealand Society for the Prevention of Cruelty to Animals Incorporated	Community	Funding toward the costs associated with purchasing cat cages	\$2,500.00
					<u>\$271,566.58</u>

From: cms@wdc.govt.nz
Sent: 29 May 2019 21:53:53 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Vanessa Hall - 2019-05-29

[Submitted by Anonymous User]

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Please enter your details:

* Full Name(s):

Postal Address:
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Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

From: cms@wdc.govt.nz
Sent: 31 May 2019 16:31:13 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Stephen Hansen - 2019-05-31

[Submitted by Anonymous User]

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Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

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From: cms@wdc.govt.nz
Sent: 29 May 2019 08:57:07 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Karl Milne - 2019-05-29

[Submitted by Anonymous User]

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Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

issues , at least the gaming machine venues are monitored by trained staff .

(This box will automatically expand)

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From: cms@wdc.govt.nz
Sent: 20 May 2019 15:45:04 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Jan Thomas
 - 2019-05-20

[Submitted by Anonymous User]

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Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

From: cms@wdc.govt.nz
Sent: 22 May 2019 12:18:51 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Patrick Newman - 2019-05-22

[Submitted by Anonymous User]

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Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

So using the wisdom of hopefully Solomon, what do I say with regards this submission?

Like most things in life, it's not cut and dried. It's not a yes or no situation, that makes it easy to answer. Do we ban everything in life that could be detrimental to some in our society?

For instance, do we ban cars from travelling above 50km an hour on the Open Road because some people will be killed in accidents at speeds higher than this?

Do we ban motor bikes because of the numbers hurt using them?

Do we ban people from flying or boating as we know some people will die as a result of these activities?

If we go down that track where do we stop. The Adventure Industry that by its very nature is guaranteed to have some participants harmed.... do we ban it in its entirety or say no new Adventure Industry Activities will be allowed?

Where does personal responsibility and individual rights within a society actually belong? The reality of life is quite simple spelled out clearly in the old saying, "One man's meat is another man's poison!"

I have thought long and hard about this submission. Whether for instance is it in the interests of the school that I even make a submission? Does the harm outweigh the good and so on?

Hora Hora School is a low Decile Primary School, situated in Whangarei City with the majority of its pupils being Maori. I know that some of my children are detrimentally effected by a parent's addiction to gambling. I know this because we are the ones that help cover these detrimental effects. We are the ones that call in the agencies etc. Therefore, it may then seem strange that my strong submission is about keeping the status quo re the number of machines in the area. Why?

(1) The vast majority of people using these machines do so within the boundaries that do not detrimentally affect them or their whanau.

(2) For most users, they are a legitimate and harmless stress relief that gives enjoyment and excitement.

(3) Those that are addicted and are users of the gambling machine effecting themselves and their whanau detrimentally, are almost certainly likely to have other traits other conditions other personalities that are also detrimental to themselves and whanau. Gambling is usually just one aspect.

What they need if we are truly going to be effective in helping them, is the services, the Help Agencies that can treat the conditions of the whole person and not just one aspect that doesn't in the end, fix anything.

(4) Schools and community groups get massive help from the proceeds of the machines. My own

school probably gains close to \$20k a year from the Oxford Trust on average, to assist children with activities they could not afford (not as a result of gambling by the way).

To help level the playing field for the children of this school.

To help provide counselling services for the children exposed to trauma and abuse.

This school would be not able to do so much that is of benefit to our children, without such help. I firmly believe the help we receive outweighs most of the harm associated with the machines.

I say this, to reiterate, because it is my experience that most of the people who are addicted to the machines effecting their lives detrimentally also have other things that would still continue to harm them, even if all gambling machines were banned in total!!

At least this way, we are able to use the proceeds for the greater good of our community!

It would hate to try and cover the needs of the children of this school, without access to such funding. Hence, my belief is that for the good of the wider community, the status quo, which is I see as a happy median, continues to apply.

(This box will automatically expand)

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Submission

on the

**Whangarei District Council
Gambling Venue Policy Review 2019**

May 2019

Hospitality New Zealand
Northland Branch

Kim Odendaal
PO Box 503, Wellington
Phone: 027 503 5408
Email: kim@hospitality.org.nz

1. Introduction

Hospitality New Zealand (Hospitality NZ) is a member-led, not-for-profit organisation representing approximately 3,000 businesses, including cafés, restaurants, bars, nightclubs, commercial accommodation, country hotels and off-licences.

Hospitality NZ represents the majority of venue operators, operating class 4 gaming machines outside of casino's and the club sector. Association membership accounts for over 700 venues that host gaming machines operated nationwide to raise funds for the community and provide entertainment to patrons.

Hospitality New Zealand is committed to working with Whangarei District Council in order to develop a practical and effective Gambling Venue Policy

We support the New Zealand Gambling Law Guide research paper "Gaming Machine Gambling Statistics and Research Paper – Information for Territorial Authorities" and that the paper should be read and considered by Whangarei District Council as part of its review. The paper is available for download at this link

<http://www.gamblinglaw.co.nz/download/Research/TAInfo.pdf>

2. Current Gambling Venue Policy (2013)

Section 3.2 (b) Any permission to establish any new class 4 venue under this clause will be subject to the following conditions:

The number of gaming machines permitted to operate at the new venue will not exceed the number permitted to be operated at the existing site with a maximum of nine machines as provided by Section 94 of the Gambling Act 2003. In the case of clubs which combine in terms of Section 95 of the Gambling Act 2003 the number of gaming machines permitted will not exceed the sum of the number of gaming machines specified in all of the corporate societies class 4 venue licences at the time of application with a maximum limit of 30.

3. Class 4 Gambling Venue Policy Statement of Proposal

The first sentence of clause 3.2b of the current Policy states that a maximum of nine machines are permitted through a relocation application. Under section 97a of the Act, a relocated venue may now have more than nine machines. As such, our Policy cannot specify a lower number and this sentence in the Policy must be removed.

Hospitality NZ does support this section of the Statement of Proposal so that the Whangarei District Councils Gambling Venue Policy is inline with the Gambling Act 2003.

4. Summary and Recommendations

Hospitality New Zealand does support the Statement of Proposal.

We appreciate the opportunity to contribute to this community consultation and will continue to be available for further consultation on this important issue.

Kim Odendaal
Regional Manager, Hospitality New Zealand
Northland Branch

PO Box 503
Wellington 6140
E: kim@hospitality.org.nz
P: 027 503 5408

From: cms@wdc.govt.nz
To: [Mail Room](#)
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Jacqueline Howarth - 2019-05-24
Date: Friday, 24 May 2019 12:06:46 PM

[Submitted by Anonymous User]

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Email:

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Name of Organisation:

(Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held **1:00pm - 3:00pm Tuesday 11 June 2019**.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

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From: cms@wdc.govt.nz
Sent: 31 May 2019 14:46:37 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Carol Lesley Neeley - 2019-05-31

[Submitted by Anonymous User]

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Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

From: cms@wdc.govt.nz
Sent: 31 May 2019 10:13:21 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Cheryl Baker - 2019-05-31

[Submitted by Anonymous User]

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Mobile Number:

Email:
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Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

Sport in New Zealand and especially Northland –

is a lot of what we do with our spare time. We are very proud of our small nations sporting achievements and how we are good at so many sports for a small country. This starts in our back yard, with junior and Youth levels and making sure they have all the opportunities available to let them play sport.

Without the funding received from trusts such as Oxford our Youth would not be able to afford the extra costs put on them for subs, uniforms, equipment and the costs of school tournaments or being able to represent their regions in age group tournaments.

If Gaming machines continue to decrease in Northland –

so will the funding available to the area be affected. While we are aware we also need to have a social conscience over the amount of gambling machines available, and the impact it also creates on society –we think there can be solutions that look after both sides of the argument.

Trust funding organisations like Oxford do considerable amounts of good in the community including helping schools, amateur sporting organisations, community service groups and the arts. Many of the projects they support would otherwise be contesting available funding from the very Council which, through its sinking lid policy, is restricting the opportunity for this alternative funding.

Kamo High School fully supports Oxford with its submission to WDC that the sinking lid policy should be replaced with a cap on the number of machines set initially at the current machine numbers but with provision for additional machines and venues to be licensed in line with population growth.

Thank you for your consideration of this submission.

Cheryl Baker

Sports coordinator

Kamo High School

(This box will automatically expand)

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From: cms@wdc.govt.nz
Sent: 31 May 2019 12:26:23 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Maureen Parker - 2019-05-31

[Submitted by Anonymous User]

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Mobile Number:

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Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

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* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once

**Submission on Whangarei District Council
Proposed Class 4 Gambling Venue Policy**



Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148
mailroom@wdc.govt.nz

Phone: 09 438 1015
Fax: 09 438 3210
Email: ngaire@manaiapho.co.nz
PO Box 1878, Whangārei 0140
28-30 Rust Avenue, Whangārei
www.manaiapho.co.nz

29th May 2019

Tena koutou,

1. Manaia Health PHO funds and coordinates services, provides resources and expertise for primary healthcare providers and delivers some specialised primary healthcare services for its enrolled population of 96,000 in the Whangarei and Kaipara districts. First level primary health care is provided by 22 General Practices, 20 Pharmacies and four Māori Health Organisations. The PHO has a focus on initiatives that address the social determinants of health and respond to community need, especially for those with high health needs. The PHO also works collaboratively with a number of other health, social services, iwi, sport, housing, education, government and local community organisations, to improve the overall health and wellbeing of our enrolled population.
2. Thank you for the opportunity to provide a submission on the Class 4 Gambling Venue Policy for Whangarei District. Manaia Health PHO has a long history of working with the Whangarei District Council on reducing gambling harm. We are mindful of the impact this policy has on the health and wellbeing of our population.
3. ***We strongly support the proposed Class 4 Gambling Policy with a 'sinking lid' approach.***
4. ***We would like to see a restriction on relocations so a true sinking lid policy can be achieved.***
5. We wish to be heard in support of our submission.

OUR SUBMISSION:

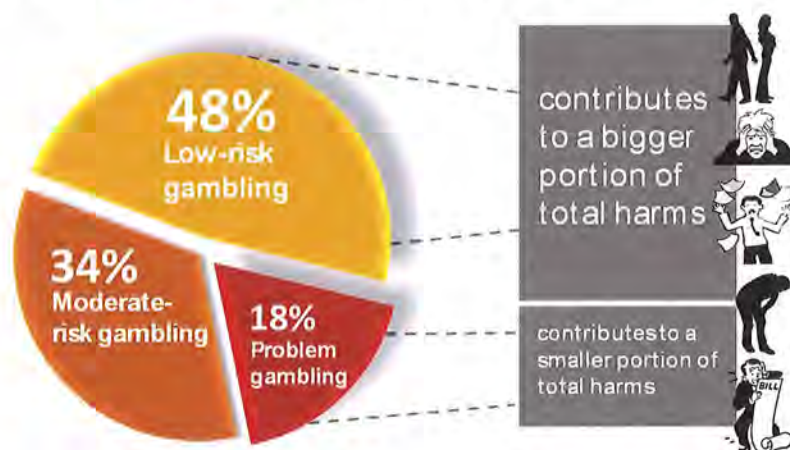
1. Gambling is a common activity in our community, with 7 in 10 New Zealand adults engaging in some sort of gambling or betting activity at least once a year¹. Gambling can be a pleasurable activity with no consequences for some people, but for others the affects can be devastating. Harmful gambling can have lifelong consequences for an individual and can also seriously impact their wider group of family and friends. Gambling-related harm in New Zealand has significant health, social, and economic implications. It is clear that harm can also accrue from gambling behaviour that does not reach clinical criteria for 'problem gambling', that is, gambling considered 'low risk' or 'moderate risk' may involve experience of harm. A public health approach requires that harms from gambling are looked at as more than individual problems, but as issues that also affect families and communities².

¹ https://www.hpa.org.nz/sites/default/files/Final-Report_Results-from-2016-Health-And-Lifestyles-Survey_Gambling-Feb2018.pdf

² https://www.hpa.org.nz/sites/default/files/Final-Report_Results-from-2016-Health-And-Lifestyles-Survey_Gambling-Feb2018.pdf

2. Overall the harm caused by gambling to the community outweighs any benefits from gambling.
3. **Manaia Health PHO has a focus on improving health equity. Harm from gambling disproportionately affects Māori and Pacific people and people from low-socio economic communities.**
4. A MOH report³ estimates that the total burden of harms occurring to gamblers is greater than common health conditions (such as diabetes and arthritis) and approaches the level of anxiety and depressive disorders. A problem gambler experiences about half the quality of life compared to ideal health and wellbeing, which is about the same as a person with severe alcohol problems.
5. Both qualitative and quantitative results suggest that this burden of harm is primarily due to damage to relationships, emotional/psychological distress, disruptions to work/study and financial impacts. The most critical result from the research is regarding absolute scale of harms from gambling to the New Zealand population. There was an estimated 161,928 years of life lost to disability as a result of harms from gambling in 2012. Within this number 67,928 years were attributed to gamblers themselves and 94,729 to people who were effected by someone else's gambling. This represents a substantial level of harm compared to other issues. In addition this calculation does not include harms experienced beyond a 12 month period, meaning that it is likely to be conservative.
6. Although some of this 'burden of harm' was concentrated in problem gamblers, the results suggested that at a population level the majority of harm is accruing to those who are not necessarily problem gamblers.
7. The figure below divides the total harm resulting from gambling amongst low, moderate and high risk gamblers. We can see that nearly half (48%) of the total harm resulting from gambling is from low-risk gamblers.

Figure One: total harm resulting from gambling amongst low, moderate and high risk gamblers.



8. Harm experienced by 'low-risk gamblers' includes not having enough money to buy food, pay bills, increasing levels of debt, spending /'wasting' too much time of pokie machines.
9. Gambling problems affect not only the gamblers themselves, but also their families and the wider community.

³ <https://www.health.govt.nz/publication/measuring-burden-gambling-harm-new-zealand>

10. Problem gambling for Māori is a significant health issue, further compounding existing health problems tangata whenua experience and increasing the social and health disparities which exist between Māori and non-Māori.
11. **Gambling harm and family violence.** Family/whānau violence and abuse is common in people seeking help for their own or for someone else's gambling. Four hundred and fifty-four clients of problem gambling treatment services took part in a short survey on gambling and family/whānau violence and abuse. There were 370 gamblers and 84 affected others (eg, partners, other family members and friends). Overall, half (50%) of the participants were victims of physical, psychological, emotional, verbal or sexual abuse in the past 12 months. Slightly less than half (44%) of the participants committed violence or abuse at least once in the past 12 months. Gamblers were more likely to commit financial abuse; affected others were more likely to be victims of financial abuse. Financial abuse related to being concerned about money, valuables or property going missing; having money taken from a purse/wallet or bank account without permission; being asked or forced to sign papers about money; or being forced to gamble for another person⁴.
12. The most commonly reported form of gambling associated with household harm was with electronic gaming machines in pubs and clubs. Close to half (49%) of people who played gaming machines in pubs or clubs at least monthly experienced some harm from their gambling. This compares with 26% of people who bet on sports or racing events at least monthly who experienced some harm⁵.
13. **GAMBLING IN WHANGAREI DISTRICT:**
Whangarei District is at risk of greater impacts of problem gambling due to:
A relatively high proportion of Māori residents (29% as compared to 16% nationally)
Large proportion of population living in areas with high NZ Deprivation Indices (8-10).
This is of concern as we know that Māori and those who live in areas with high deprivation are most impacted by the gambling of others⁶.
14. Although the number of pokie machines in our district has decreased since 2013, the spending on pokie machines has been steadily increasing. There were 304 pokies (3.6 pokies per 1,000 people) in March 2013 and by December 2018, this was reduced to 274 pokies (3 pokies per 1,000 people) in the District. The 2018 pokie numbers per 1,000 people were similar to New Zealand numbers (i.e., 3 pokies per 1,000 people)⁷.
15. Spending has increased from 13.9 million in 2013 to 16.7 million dollars per year in 2018. (Figure 2). There was also an increase in spending on pokies across the country by 12% but the increase was much higher in Whangarei District at 20%⁸.

⁴ Auckland University of Technology. 2017. Problem Gambling and Family Violence in Help-Seeking Populations: Co-Occurrence, Impact and Coping. Wellington: Ministry of Health. Accessed online: 28.05.2019 <https://www.health.govt.nz/publication/problem-gambling-and-family-violence-help-seeking-populations-co-occurrence-impact-and-coping>

⁵ 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. Accessed online 28.4.2019

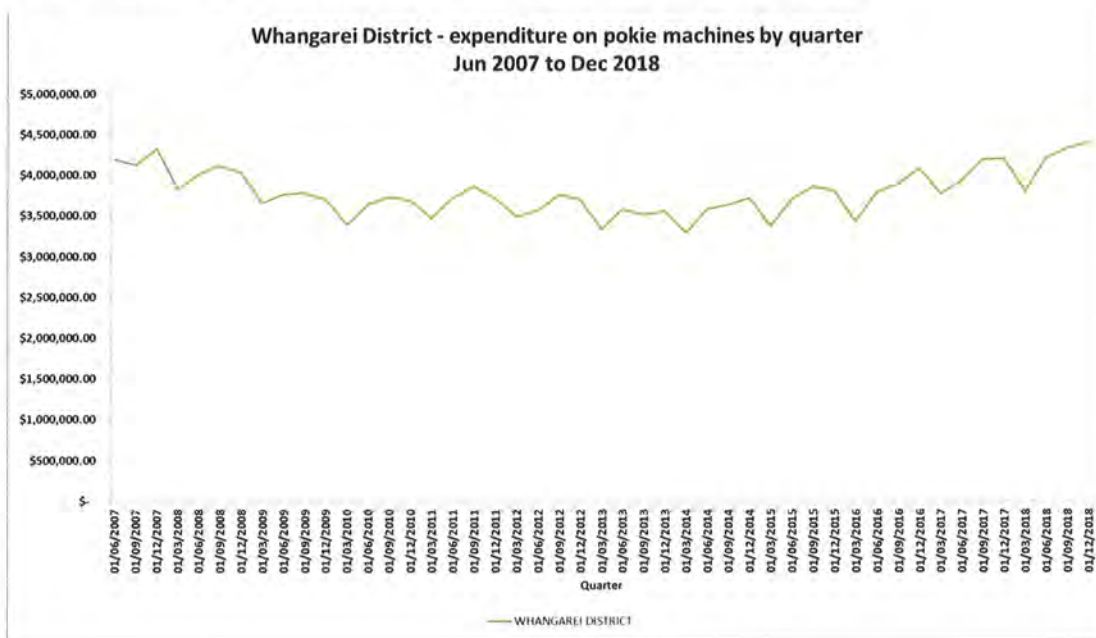
https://www.hpa.org.nz/sites/default/files/Final-Report_Results-from-2016-Health-And-Lifestyles-Survey_Gambling-Feb2018.pdf

⁶ Ibid.

⁷ Department of Internal Affairs. Summary of Venues and Numbers by Territorial Authority/District, Department of Internal Affairs. 2019: Wellington.

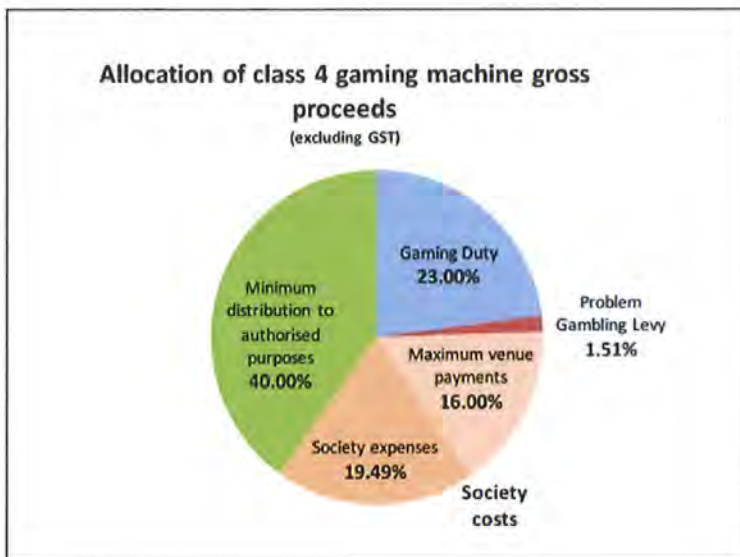
⁸ Department of Internal Affairs, Summary of Expenditure by Territorial Authority/District, Department of Internal Affairs. 2019: Wellington.

Figure 2: Expenditure on pokie machines - Whangarei District (2007 to 2018)



16. The Whangarei District spent nearly \$4.5million on gaming machines in the year ending December 2018. Nearly half these profits leave the district⁹. The graph below shows where the money from pokie machines ends up¹⁰. Considering the harm to individuals, whānau and community from problem gambling this is not a good return.

Figure 3: Where the money from pokie machines goes



17. One proposed benefit of pokie machines is the funds they distribute to community groups. However a Social Impact Assessment (SIA) conducted for Whangarei District Council in 2006 showed that there was a net economic loss to Whangarei community of \$4.7 million dollars, even after taking into account the gambling funds returned to the community¹¹.

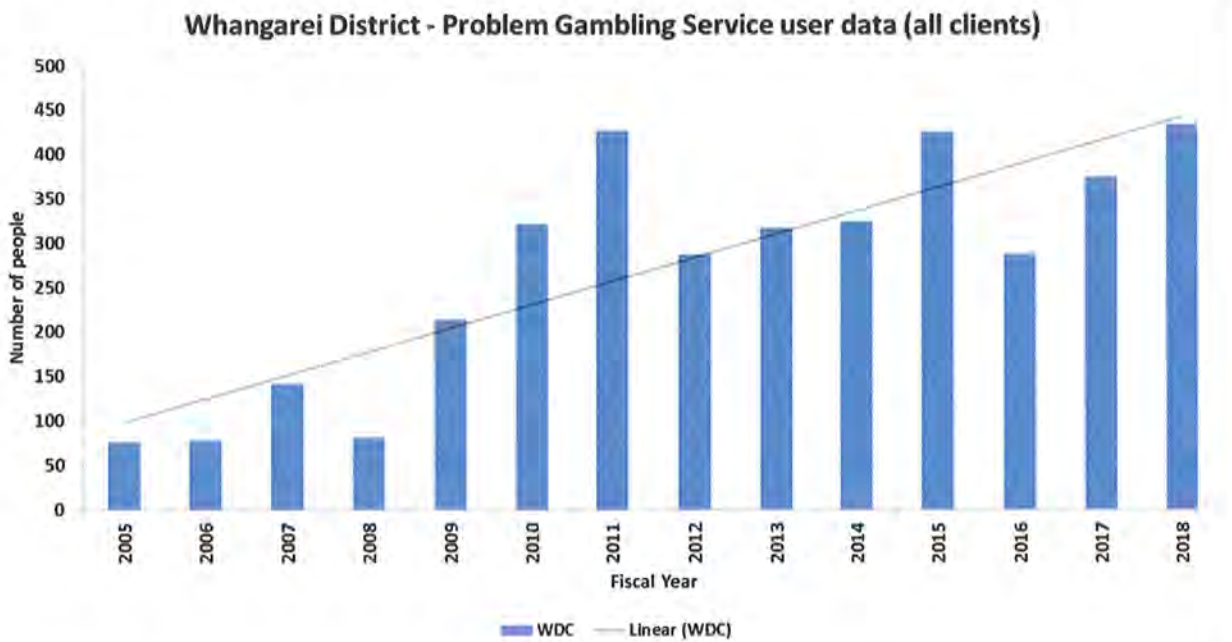
⁹ Ibid

¹⁰ [https://www.dia.govt.nz/diawebsite.nsf/Files/Pokie-system-101-untracked/\\$file/Pokie-system-101-untracked.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Pokie-system-101-untracked/$file/Pokie-system-101-untracked.pdf)

¹¹ APR Consultants. Social Impact Assessment - Class 4 Gambling in the Whangarei District. Whangarei.2006

18. The increase in spending on the pokie machines indicates that harm from problem gambling is increasing rather than decreasing in Whangarei District¹². This is supported by data from problem gambling services showing an increase in people accessing problem gambling services (Figure 4).

Figure 4: Problem Gambling Service Users – Whangarei District 2005 -2018



19. Whangarei District had much higher rates of people accessing support for problem gambling compared with the rest of New Zealand, 47 per 10,000 people in Whangarei v/s 22 per 10,000 people, New Zealand)¹³. Also of note is people accessing problem gambling treatment services is steadily decreasing across the country whilst increasing for Whangarei District.
- 20. *Gambling on pokie machines is viewed by the majority of people in Aotearoa / New Zealand as socially undesirable***
Results from the 2016 Health and Lifestyles survey reported that just over half (55%) of respondents believed some forms of gambling were socially undesirable. The form of gambling most commonly reported to be socially undesirable was gaming machines at a pub or club. The next most socially undesirable activities were gaming machines at a casino and mobile phone games for money. In addition, the majority (59%) of New Zealand adults do not believe that 'pokie machines make a pub or bar more enjoyable to spend time at'¹⁴.
- 21. *Fundraising from gambling does more harm than good***
From the same survey mentioned above, nearly half (46%) of respondents believed that raising money through gambling did more harm than good in the community. 30% of respondents thought gambling does *equal good and harm* or said they *don't know*. This suggests there is decreasing awareness of the role of raising money through gambling in the community¹⁵.

¹² 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

¹³ Ministry of Health. Gambling Service User Data - Intervention client data: Clients Assisted, by Territorial Authority. Ministry of Health. Wellington. 2019

¹⁴ 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. Accessed online 28.4.2019

https://www.hpa.org.nz/sites/default/files/Final-Report_Results-from-2016-Health-And-Lifestyles-Survey_Gambling-Feb2018.pdf

¹⁵ Ibid.

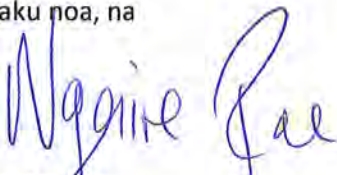
- 22. Pokie machine funding is a regressive tax – it takes money from the poor and redistributes to the rich.** Most of Whangarei gaming venues are located in areas of high deprivation (7-10). 10 is the highest level of deprivation within the NZDeplIndex, 2013).
- 23. Whangarei District has more than enough pokie machines already – and more than the national average.** Whangarei has 1.81% of the pokie machines in the country. This is higher than the national average¹⁶.
- 24. Since 2003 Whangarei District has led New Zealand with a sinking lid approach on pokie machine licences being enacted since the first policy.** This stance is important to retain. The Council must do all it can to reduce gambling harm. A strong sinking lid policy would send a clear message that Whangarei District Council is serious about improving community wellbeing.
25. NZ research shows that the rate of participation in gambling has remained static since 2012¹⁷. Of note, is that between 2010 and 2016 there has been no statistically significant rise, overall, in the proportion of respondents who gambled online on an overseas website. Overseas online gambling activities included betting on a horse/dog race through an overseas TAB or betting agency, internet bingo and online poker¹⁸.

In conclusion:

- There is overwhelming research showing gambling has negative impacts on the physical, mental and social and economic well-being of our community – affecting not only those who gamble, but their whānau and others. These negative impacts far outweigh any positive factors associated with gambling.
- The impacts are not equally distributed: socio-economically disadvantaged groups (where Māori are disproportionately represented) are most likely to suffer the negative impacts of gambling.
- Pokie machines contribute to most harm, and there is a net economic loss from gambling related to pokies in Northland.
- A key strategy that can contribute to reducing the negative impacts of gambling is to reduce the total number of pokie machines, and for Whangarei District Council to retain a 'sinking lid' policy.
- In addition to the retainment of a 'sinking lid' policy Whangarei District Council should remove the relocation clause altogether.

Thank you for the consideration given to this submission. I look forward to speaking to this submission.

Naku noa, na



Ngaire Rae
Health Promotion Manager, Manaia Health PHO.

¹⁶ [https://www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Statistics/\\$file/Quarterly-GM-and-Venues-by-Territorial-Authority-March-2019.pdf](https://www.dia.govt.nz/diawebsite.nsf/Files/Gambling-Statistics/$file/Quarterly-GM-and-Venues-by-Territorial-Authority-March-2019.pdf)

¹⁷ https://www.hpa.org.nz/sites/default/files/Final-Report_Results-from-2016-Health-And-Lifestyles-Survey_Gambling-Feb2018.pdf

¹⁸ *ibid*

From: cms@wdc.govt.nz
Sent: 30 May 2019 17:48:30 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Dianne Holwell - 2019-05-30

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

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* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

only funding.

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

If you have supplied a valid email address, a copy of this completed form will be emailed to you. Otherwise please print a copy of it for your own records before you close this window.

*Submit Button - This button will become active when all mandatory fields are filled in (fields marked with *) and you click once on the button.*

All submissions are considered official information under the Local Government Official Information and Meetings Act, and may be published and/or made available to elected members and the public.

From: cms@wdc.govt.nz
Sent: 24 May 2019 12:51:13 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Pat Thompson - 2019-05-24

[Submitted by Anonymous User]

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Please enter your details:

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 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

From: cms@wdc.govt.nz
Sent: 23 May 2019 11:11:04 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Stan Terry - 2019-05-23

[Submitted by Anonymous User]

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Please enter your details:

* Full Name(s):

Stan Terry

Postal Address:

21 Tattley Place

(This box will automatically expand)

* Best Daytime Phone Number:

021 805595

(If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

021 805595

Email:

stan.annterry@gmail.com

(If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:

Mt. Manaia Bowling Club

(Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission? No

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

We wish to maintain the support of the PubCharity at the level it currently operates. The charity has been very important supporter of our Club over the years

(This box will automatically expand)



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): NICOLE

Last name: SPRATT

Postal address: c/o Netball Northern Zone
PO Box 21 241 Henderson

Best daytime phone number: _____ Mobile: 021 450 021

Email: nicole.spratt@netballnorthern.co.nz

I am writing this submission (✓ box) as an individual on behalf of an organisation

Organisation name: Netball Northern Zone

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 (✓ box) Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

Be sure to get your written comments to us by **5.00pm on Friday 31 May**. Follow the instructions and provide your comments on the next page.

How to register and/or get this form to us

IN PERSON:

By visiting Customer Service desks at either: Forum North, Rust Ave, Whangarei, or Ruakaka Service Centre, Takutai Place, Ruakaka

or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz

From: [Tanya Piejus](#)
To: [Mail Room](#)
Subject: NZCT's submission on your gambling venues policy review
Date: Monday, 20 May 2019 12:00:57 PM
Attachments: NZCT Gambling Venue Policy Review submission - Whangarei District Council, May 2019.pdf

Hi

Please find attached NZCT's submission on your gambling venues policy review. We do not wish to speak at the public hearing.

Thanks
Tanya

Tanya Piejus
Communications Manager



New Zealand Community Trust
LOCAL GAMING – LOCAL FUNDING
PO Box 10 857, Wellington 6143
PH: 04 495 1594 | MOB: 021 804 346
Web: <http://www.nzct.org.nz>





Submission to

Whangarei District Council

on the proposed combined

Class 4 Gambling Venue Policy

May 2019

Contents

Executive summary	3
Community organisations rely on pub gaming to survive	3
The pub gaming sector has experienced a significant decline	4
Council policies contribute to the decline in the pub gaming sector	4
Online gambling is an unregulated threat	4
Location of gaming machines is more important than their number	5
NZCT’s recommendations	5
Pub gaming’s vital support for the community	6
NZCT’s revenue distribution in 2017/18	7
NZCT’s position	9
Why allowing relocations is important	9
Helping reduce harm	9
Supporting local hospitality businesses	9
Responding to future demand	9
Allowing appropriate benefit and responsibility	9
Parliament’s directive is being acknowledged by other councils	10
Reasons to move to a cap on gaming machines	11
Gaming machines are an important component of your local hospitality sector and an important source of community funding	11
<i>Community funding</i>	11
<i>Difference between pub gaming societies, and clubs and New Zealand Racing Board</i>	11
Gaming machine numbers have little effect on problem gambling numbers	12
Gaming machines are a legal and valid entertainment choice	12
Problem gambling rates have plateaued	12
Problem gambling rates in New Zealand are relatively low	13
Gaming machines can only be played in strictly controlled environments	13
<i>Strict harm minimisation obligations</i>	14
<i>Harm minimisation activities</i>	14
<i>Ongoing obligations</i>	15
<i>Training</i>	15
Support is available for problem gamblers	15
Further information about our submission	16
Appendix 1: About NZCT	17
Who we are	17

Executive summary

- Gaming trusts return around \$300 million to the New Zealand community every year in grants, while implementing the Gambling Act's stringent requirements for preventing and minimising harm from gambling. Many grassroots organisations would struggle or cease to operate without gaming trust funds.
- 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 limited relocation policies destroy this infrastructure. Councils need to take a balanced approach to community benefit and potential harm from gambling.
- Reducing the number of gaming machines in communities does not reduce problem gambling, which has been consistent at a rate of around 0.5% of the adult population since 2003 (currently 0.2%), despite a decrease of 10,000 gaming machines since then. Research has shown that allowing gaming venues to relocate out of areas of high deprivation is more effective in reducing problem gambling.
- If gaming venues are removed from the community, gamblers may move to the online environment where gambling is unregulated and unmonitored, has no harm minimisation measures, incentivises spending and returns nothing to the New Zealand community.

Community organisations rely on pub gaming to survive

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

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

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

Seventy-five percent of groups surveyed in 2012 indicated their organisation is moderately or totally reliant on gaming funding to support their core business. Fifty-five percent said there would be a high to extreme risk to their organisation and their core business if they did not receive this funding.¹

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.

¹ Page iii, Community Funding Survey, Point Research 2012.

Every year, the gaming trust sector as a whole raises around \$300 million² for thousands of worthwhile sports and community groups. The sector's contribution to the community through funding, in addition to the contribution to government revenue from GST, other taxes and levies, is acknowledged by central government.

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

The pub gaming sector has experienced a significant decline

During the last 15 years the pub gaming sector has experienced a significant decline. Department of Internal Affairs (DIA) statistics show that, between 30 June 2003 and 31 December 2018:

- the number of gaming venues reduced from 2,122 to 1,117 (a 47% reduction)³
- the number of gaming machines operating reduced from 25,221 to 15,257 (a 40% reduction)⁴.

Council policies contribute to the decline in the pub gaming sector

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

Such policies are based on the erroneous belief that limiting gaming machine numbers will limit problem gambling. In fact, despite the 40% reduction in gaming machine numbers during the past 15 years, New Zealand's problem gambling rate has remained consistently low at around 0.3% to 0.7% of the population. The 2015 New Zealand Gambling Study (the most recent) found the rate was 0.2% and the latest Health and Lifestyles Survey found it was 0.1%. The 2012 New Zealand Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006."⁵

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

Online gambling is an unregulated threat

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

² *Class 4 Gambling Report*, DIA, 2017.

³ DIA statistics: https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict

⁴ *Ibid.*

⁵ Page 7, *New Zealand 2012 Gambling Study: Gambling harm and problem gambling*.

Location of gaming machines is more important than their number

Research⁶ 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 Act⁷ to require local authorities to consider adding relocation clauses to their gambling policies.

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

NZCT's recommendations

The New Zealand Community Trust recommends Whangarei District Council:

- replace the sinking lid with a cap based on current machine and/or venue numbers
- broaden the current relocation provision to allow venues to relocate for their own business reasons as well as when forced to by circumstances beyond their control.

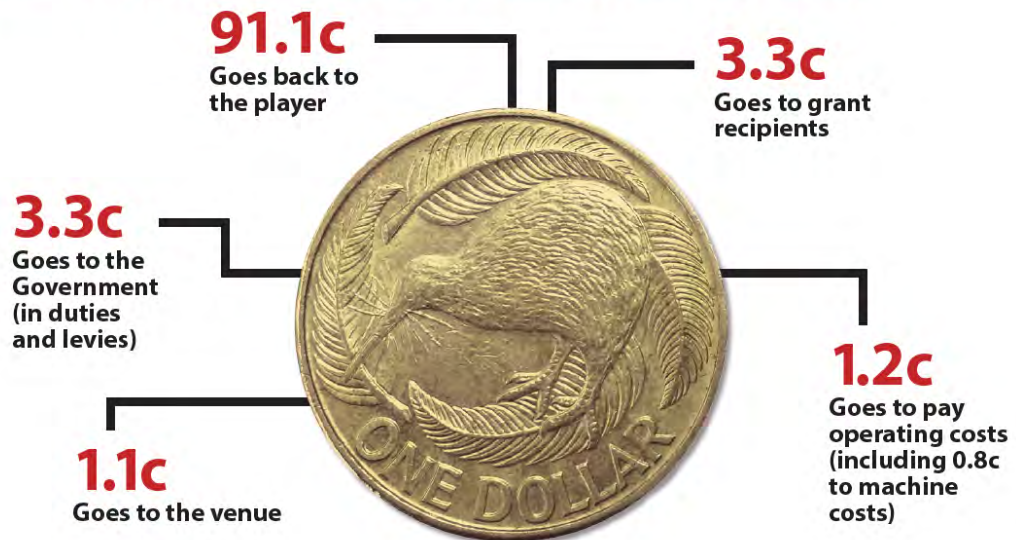
⁶ *Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland*, Gambling & Addictions Research Centre, AUT University, 2012.

⁷ Section 97A and 102(5A).

Pub gaming's vital support for the community

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

For every dollar a player wagers at an NZCT gaming room, on average:



Research⁸ shows that the annual entertainment value from the pub gaming sector to recreational players is around \$250 million. The government revenue in the form of tax, duties and levies is also substantial and was over \$279 million in 2014.

Grants distributed by gaming machine trusts were 10% of the total philanthropic funding to the community and voluntary sector in 2011 and were at almost twice the level given by New Zealand businesses. In 2017, the amount of funds returned to the community from non-casino gaming grants was around \$300 million.⁹ 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 2017/18 reporting period).

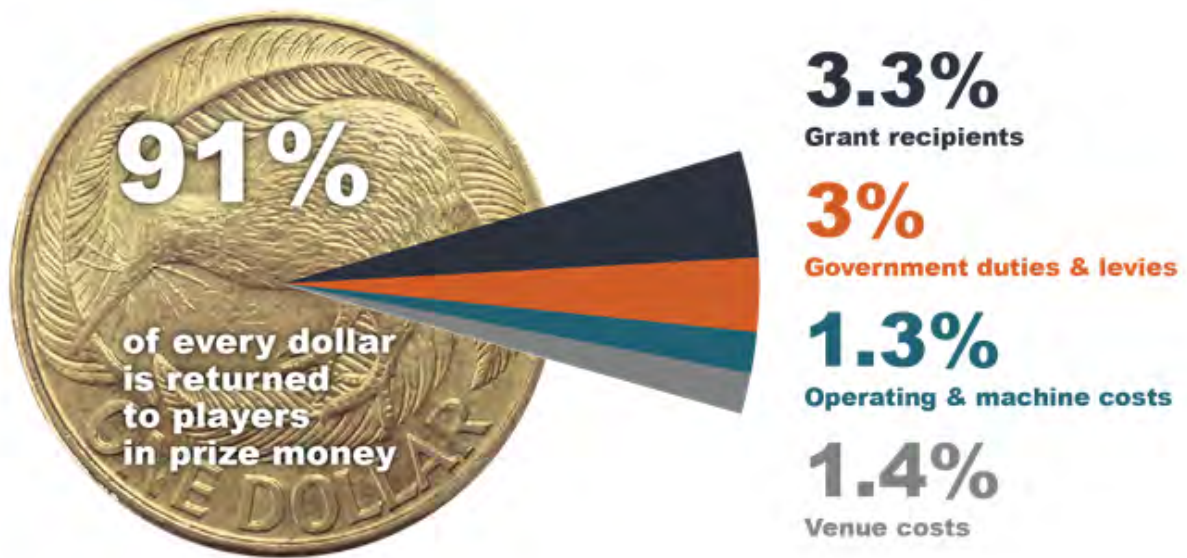
Each year the gambling industry pays around \$20 million to the government, so the Ministry of Health can implement its Preventing and Minimising Gambling Harm Strategic Plan. These funds pay for the implementation of public health services, intervention services, research, evaluation and workforce development.

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

⁸ *Maximising the benefits to communities from New Zealand's community gaming model*, BERL, February 2013.

⁹ *Class 4 Gambling Report*, DIA, 2017.

NZCT's revenue distribution in 2017/18



In the year ending 30 September 2018, NZCT distributed \$44.6 million to 1,920 sports and community groups through 2,250 grants.

Amateur sport is our main focus, so around 80% of the grants we distribute go to sports organisations. Each year, NZCT funds around 50 different sports.

In 2017/18, we funded the equivalent of:

- uniforms for 49,555 rugby teams (one uniform costs \$60), or
- 2,973,333 footballs (one football costs \$15), or
- 5,575 four-person waka (one waka costs \$8,000), or
- more than 2.23 million hours – or 254.5 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 22.3 million \$2 sausages at sausage sizzles and every person in New Zealand would need to buy and eat five sausages, or
- sell five \$2 raffle tickets to every man, woman and child in New Zealand each year, or
- wash more than 8.9 million cars at \$5 a wash, which would take 10 people continuously washing cars for 30 minutes around 50 years to achieve.

Sport New Zealand's report *The Value of Sport* states:

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

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

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

NZCT's position

In the following pages, we provide five reasons why we advocate for gaming venues to be allowed to relocate to new premises in a broad range of circumstances. We also provide seven reasons why we support a cap on venue and gaming machine numbers, rather than a sinking lid.

Why allowing relocations is important

Helping reduce harm

Research¹⁰ 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".¹¹ The Ministry of Health also found "being a problem gambler is significantly associated with living closer to gambling venues."¹² Allowing gaming operations to move out of high-deprivation areas could potentially diminish gambling harm for at-risk communities.

Supporting local hospitality businesses

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

Responding to future demand

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

The DIA recommended relocation policies as a way of allowing territorial authorities to future-proof their Class 4 gambling policies.¹³

Allowing appropriate benefit and responsibility

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

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

¹⁰ *Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland*, Gambling & Addictions Research Centre, AUT University, 2012.

¹¹ Page 21, *Ministry of Health Gambling Resource for Local Government*, 2013.

¹² *Ibid.*

¹³ *Internal Affairs Policy Briefing 3: Options for improving territorial authority gaming machine policies*, 28 March 2013.

Parliament's directive is being acknowledged by other councils

Of the many local authorities (see the table below) that have completed a gambling venue policy review since 2015, only six have not allowed relocations in their policy after considering a new or amended clause.

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

Council	Submissions made	Review result
Thames-Coromandel	March 2015	Added relocation option
Wellington City	May 2015	Added relocation option
Westland	May 2015	Added relocation option
Hutt City	June 2015	Added relocation clause
Kaipara	June 2015	Added relocation option
Invercargill City	July 2015	Added relocation option
Waipa	August 2015	Added relocation option
Waitaki	September 2015	Added relocation option
Gisborne	November 2015	Added relocation option
Whakatane	April 2016	Added relocation clause
Matamata-Piako	April 2016	Added relocation clause
Southland	July 2016	Added relocation option
South Taranaki	August 2016	Added relocation option
Palmerston North	October 2016	Existing relocation option remains unchanged
Tasman	No public consultation	No relocations allowed
Otorohanga	March 2017	No relocations allowed
Hastings	March 2017	Existing relocation clause amended
Auckland	No public consultation	No relocations allowed
Napier	May 2017	Existing relocation clause amended
Rotorua	May 2017	Existing relocation clause amended
Queenstown	June 2017	Re-consulting on relocation clause in November 2017
Wairoa	June 2017	Existing relocation clause remains unchanged
Waitomo	No public consultation	Existing relocation clause remains unchanged
Hauraki	October 2017	No relocations allowed
New Plymouth	October 2017	Added relocation option
Horowhenua	October 2017	Existing broad relocation clause remains unchanged
Manawatu	September 2017	Existing broad relocation clause remains unchanged
Central Hawke's Bay	November 2017	Added relocation option
Dunedin	December 2017	Added relocation option
Thames-Coromandel	No public consultation	Existing relocation clause remains unchanged
Kawerau	December 2017	No relocations allowed
Taupo	October 2017	Existing relocation clause remains unchanged
Whanganui	October 2017	Added relocation option
Stratford	March 2018	Broad relocation policy introduced
Hamilton	February 2018	Proposal to remove relocation policy rejected
Marlborough	December 2017	Broader relocation policy introduced
South Waikato	March 2018	Existing relocation clause remains unchanged
Christchurch	No public consultation	No relocations allowed
Tauranga	November 2018	Broader relocation policy introduced
Nelson	October 2018	Existing relocation clause remains unchanged

Waitaki	September 2018	Relocation clause broadened
Waikato	August 2018	Existing relocation clause remains unchanged
Selwyn	June 2018	Existing relocation clause remains unchanged
Grey	June 2018	Relocation clause broadened
Kapiti	November 2018	Relocation clause clarified
Kaipara	November 2018	Existing relocation clause remains unchanged

Reasons to move to a cap on gaming machines

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

Local hospitality sector

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

Community funding

Around \$300 million is returned to the community every year through grants awarded by Class 4 gaming societies. Many community organisations, such as sports clubs, hospices, rescue services and arts groups, would struggle or cease to function without this funding. There is currently no sustainable alternative to this funding to the level provided by gaming societies.

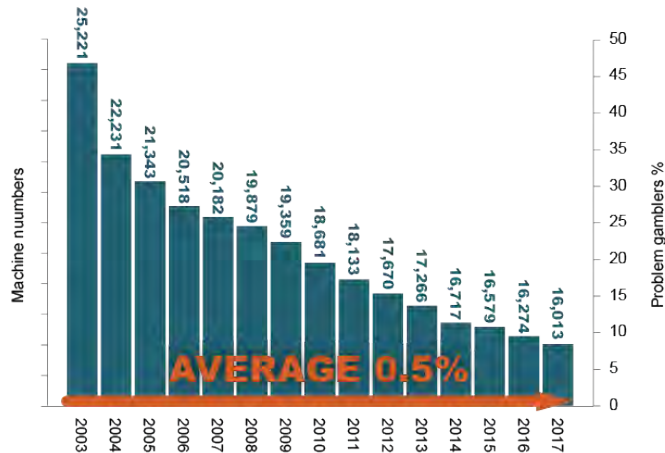
Class 4 gaming societies have probity processes we go through with every grant application to ensure the applicant is authentic and able to deliver the outcomes detailed in their grant application, and that any goods or services to be paid for by the grant are at arm's length and free from any conflicts of interest.

Difference between pub gaming societies, and clubs and New Zealand Racing Board

The pub gaming model differs from the gaming run at clubs like RSAs and in New Zealand Racing Board (NZRB) venues. Those entities can apply the funds they raise to their own purposes, for example, maintaining clubrooms or funding race meetings. In its 2018 annual report, NZRB advised its distributions totalled \$148.2 million to the three racing codes and only \$3.4 million to other sports codes. In contrast, Class 4 societies like NZCT distribute all net proceeds to the community.

Gaming machine numbers have little effect on problem gambling numbers

It is 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. As shown in the graph below, a reduction of almost 10,000 gaming machines across the country between 2003 and 2017 had no impact on the small percentage of problem gamblers nationally.



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

Gaming machines are a legal and valid entertainment choice

Pub gaming is a legal, valid and enjoyable source of entertainment for Whangarei 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."¹⁴

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

Pub gaming brings many benefits to New Zealand. Business and Economic Research Ltd (BERL)¹⁵ calculated in 2015 that each year the entertainment value to recreational players is around \$250 million, the grants value to the community is also around \$250 million (now \$330 million), and the Government revenue value in the form of tax, duties and levies is 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 2012.¹⁶ The study concluded: "Problem gambling and related harms probably reduced

¹⁴ Gambling Commission decision GC 03/07.

¹⁵ *Maximising the benefits to communities from New Zealand's Community Gaming Model*, BERL, February 2013.

¹⁶ Pg 8, *NZ 2012 National Gambling Study: Overview and gambling participation*.

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.”¹⁷

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

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

It also states that the current problem gambling rate has now dropped to an all-time low of 0.1% of the adult population (around 7,500 people), despite an upward trend in gaming machine expenditure.¹⁸

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 below, New Zealand has one of the lowest rates of problem gambling in the world.¹⁹ 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 ²⁰	

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.

¹⁷ Pg 18, *ibid*.

¹⁸ DIA media release: <http://livenews.co.nz/2017/04/21/new-zealand-gaming-pokie-spending-patterns-continue/>

¹⁹ *Maximising the benefits to communities from New Zealand's community gaming model*, BERL, February 2013.

²⁰ 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:

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

Harm minimisation activities

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

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

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



Ongoing obligations

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

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

Training

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

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



Support is available for problem gamblers

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

Two of the findings from the inaugural PMGH baseline report were that problem gambling services are effectively raising awareness about the harm from gambling, and interventions for gambling-related harm are moderately accessible, highly responsive and moderate to highly effective.²¹

The world's largest clinical trial²² for problem gambling treatment found that, one year after calling the Gambling Helpline, three-quarters of callers had quit or significantly reduced their gambling.

²¹ Page 16, *Outcomes Framework for Preventing and Minimising Gambling Harm Baseline Report*, May 2013.

²² *The Effectiveness of Problem Gambling Brief Telephone Interventions*, AUT, Gambling & Addictions Research Centre.

Further information about our submission

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

Appendix 1: About NZCT

Established in 1998, NZCT is New Zealand's largest gaming trust with 16% market share. Our publicans raise funds by operating gaming lounges within their pubs, hotels and other venues. In the 12 months to 30 September 2018, NZCT approved \$44.6 million in grant funding to sporting, local government and community groups nationwide.

We have twin goals of serving both our publicans and the communities in which they operate. At least 80% of the funds we distribute are directed towards sports activities, making NZCT the largest funder of amateur sports participation in New Zealand. We focus on sport because of the many positive benefits it offers communities, such as:

- crime reduction and community safety
- economic impact and regeneration of local communities
- education and lifelong learning
- participation
- physical fitness and health
- psychological health and wellbeing
- social capital and cohesion.²³



Overseas research²⁴ has found participation in sport can lead to increased health and productivity for individuals, and increased wealth or wellbeing of society as a whole. While amateur sport is our main focus, we are also strong supporters of other worthy community activities, including local government projects.

Who we are

We are proud of our robust grants system and of the quality of people involved with NZCT. All our trustees²⁵ are highly regarded business and community leaders with extensive governance experience. They are supported by an experienced staff and 10 Regional Advisory Committees (RACs) who add local knowledge and insight to our grant decisions.

²³ Sport England's Value of Sport Monitor.

²⁴ http://www.ausport.gov.au/information/asc_research/publications/value_of_sport.

²⁵ Alan Isaac (NZCT chairman, professional director and sports administrator), Peter Dale (former Hillary Commission chief executive), David Pilkington (professional director), Kerry Prendergast (former mayor of Wellington) and Lesley Murdoch (Olympian and former New Zealand cricket captain, broadcaster).

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SUBMISSION FORM

Class 4 Gambling Venue Policy amendments

Huia Orr
359 A Takahiwai Road, Ruakaka
0210491663
huiaanderson@gmail.com

Submission made on behalf of Ngā Manga Puriri - Northland Problem Gambling Services

On 24th April 2019 Whangarei District Council adopted a Statement of Proposal for the Class 4 Gambling Policy.

On the behalf of Ngā Manga Puriri - Problem Gambling Services we oppose the proposed changes that relate to clause 3.2b of the Class 4 Gambling Venue Policy. We believe it would be detrimental to our community to change the current policy to align with legislative provisions as stipulated under 97A of the Gambling Act 2003.

Our primary role as an organization is to minimize the harm caused by class 4 gambling in the Tai Tokerau region and to control the growth of class 4 gambling. We seek to ensure that those who choose to engage in gambling in our district can do so in a controlled and well managed environment.

The proposed changes would potentially allow any relocated venue to have more than nine machines and would restrict council capacity to restrict or lower this number.

We strongly believe that the current restrictions that relates to clause 3.2b of the Class 4 Gambling Venue Policy provide better restrictions and control around the relocatable numbers of gaming machines.

We seek to keep the current status quo.

From: cms@wdc.govt.nz
Sent: 31 May 2019 01:12:21 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - marino murphy - 2019-05-31

[Submitted by Anonymous User]

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Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

ict, child neglect, poor work performance, multiple addictions, stress related physical ailments, crime and even suicide. Since the 1980s gambling in New Zealand has gone through many changes and Maori population has felt the worst effects, Maori are more likely to have gambling problems because pokie machines -

the most HARMFUL form of gambling are highly concentrated in deciles with high Maori populations. Maori adults are approximately three and a half times more likely than the average adult to be problem gamblers, about a third of moderate-

risk and problem gamblers are Maori. The closer the pokie machines are to living environments, the higher the risk and harm due to gambling in the community. Furthermore there is a strong relationship showing an increase in gaming machines leads to increase in problem gambling in a community. Abott reported that during 1999 a CAPPED policy allowing relocation of the machines lead to relocation of machines to neighborhoods with greater numbers of people at risk for problem gambling. These findings indicate that policies related to restricting or reducing the density of these gaming machines are likely to play a significant role in containing or reducing gambling related harms. However I wish to point out that problem gambling has a greater impact on the health of the population in this region, than other regions. As stated (Christie) "An increase in population as another reason to move to a capped policy, does not take into account the increased number of problem gamblers and affected others that seek crisis support for problem gambling. Gaming machines have increased from March 2018 -

265 to 274 in March 2019. We seek to record support for the following provisions in the Whangarei District Council Class 4 Gambling Venue Policy as -

1. maintain the sinking lid policy for new gaming venues. 2. No consent for increases in number of machines. 3. No consent for club venues to increase to 18 machines. 4 No relocation of machines. 5. Restriction on numbers of machines in the case of club merger.

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Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

If you have supplied a valid email address, a copy of this completed form will be emailed to you. Otherwise please print a copy of it for your own records before you close this window.

*Submit Button - This button will become active when all mandatory fields are filled in (fields marked with *) and you click once on the button.*

All submissions are considered official information under the Local Government Official Information and Meetings Act, and may be published and/or made available to elected members and the public.

31 MAY 2019

WHANGAREI
DISTRICT COUNCIL

**PETITION FORM FOR SUBMISSION - CLASS 4 GAMBLING VENUE POLICY
SUBMISSION DUE 31 MAY 2019**

I do not support the proposed changes by the Whangarei District Council that relates to clause 3.2b of the Class 4 Gambling Venue Policy. I believe it would be detrimental to our community to change the current policy to align with legislative provisions as stipulated under 97A of the Gambling Act 2003.

As a resident of Whangarei District we seek to maintain the current policy that states that a maximum of nine machines are permitted through a relocation process.

We seek to control the growth of class 4 gambling so to minimize the harm caused in our community.

NAME	ADDRESS	EMAIL	CONTACT PHONE
Sharmare Nikonji	5366 Kamohi	Sjnikonji@gmail.com	021-0867-3200
Gazelle Sadler	"	"	"
Rebecca Tam	44 Charles St	flawntit1@gmail.com	0212316819
Jamie Ross-Harris	58 Thomas st,		094356489
Jayn Witzhira	Flat 2, 19 Kaurika		0212593549
Komal Patel	83 Pebble Beach		0220123950
Tui Leutz	10 Croydon place	Komo.stleutz@gmail.com	0212315505
Ama Hoare	32 Puriri Street		0210626054
Tim LANGMAN	56 Great North Road		02102617333
Janie Langman	"		"
Graeme Baneh	6 Oakland ave	mauch205@hotmail.com	0210366570
Vony CHHORO	GLONBORO RD		02140691
John Kaiser	400 Tauraroa rd		0211404719
Joshua Moringa	8 carlton cres Koro		021325876
Ferhat Dogon	392 Koro Rd		0211372002
Ashlee hodgins	31 carr street		021438598
Keniz Keskin			0210544325
Francois Tona			When st

31 MAY 2019

WHANGAREI
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NAME	ADDRESS	EMAIL	CONTACT PHONE
HAZEL NAIRA	2/62 Clark Rd Kamo	N/A	4356462 -
Harry Harrison	23 Se Awaroa rd		0221361965
Fay Darroch	278 3 Mile Bush Rd		4351678
Corrie Papana	78 Boundary Rd		0226906861
Tony Wilson	1 Tuatara Drive		0211245696
Eva Wilson	1 Tuatara Drive		0211245696
Paul Atkinson	5 St Andrews Av Kamo		0211792804
Jane Atkinson			0211792804
Kaye Bam	1254 Pipirahi Rd		021586976
Paul Rupapera	85 Maunanga Heights		021395142
Graham Haru	9 Koko St Parahaki		021554985
Lena Henry	850 State Highway 14 Maungatapere		0211504951
Jenny Callis	1 Taukura St Whangarei Hots		021914912
Dave Williams	152 Jordan Valley Rd		0275479241

31 MAY 2019

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NAME	ADDRESS	EMAIL	CONTACT PHONE
Sandra Henderson	152 Three Mile Bush Kamo.		02108597326
Duran Wyatt	10 PARK ST HIKURANGI		(09) 4337234
Angie Sadler	22 Tappin Close Titipunga.		0223457330
B. How	Kamo		8370250
Lena Macdonald			021343143
Al Busch	101 Gordon Road		027 2124589
Jane Sampson	977 HIKURANGI RD		0276974999
Heleen Pascoe	R04 Hikurangi		4373650
Wendy Grate	17 Rantbury Pl Kamo		4375215
Janice Witia	3 Balmacrews Dr Kamo		4338041
Jim & Hurdie			02102328428
Hilary Cooper	37 Stoebridge Cres		0212611194
Marian Platt	15 Pyle Rd East		6284021413
Cecilia Rauski			021 2085334
Charissa Jacques	17 Puriri St. Kamo		0210573284
Julie Hamilton	46 Carlton Cres.		02102763633
Kimittarvy	12 Seatonrough Lane		
Edward Morehu	718 Whangarei Nth Road		

31 MAY 2019

WHANGAREI
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NAME	ADDRESS	EMAIL	CONTACT PHONE
Sandra Ruddell	Tikipunga	smruddell@xtra.co.nz	09 4595555
Melissa Nuku	Sandspit	melissanuku@gmail.com	0284038576
Toni PERE	Cherahi		0210 600 508
Evon Morgan	420 Kamo Rd. Kamo	evanobackini.nz	4353202
JOHN HIKI	15 CAMELLIA AV		021 151 8239
DAVID MACKEN	335A WESTERN HILLS DRIVE		
BS Bortler			438-3914
Yvonne Park		yvonne.park@elimchristiancentre.org.nz	021 655 125

31 MAY 2019

WHANGAREI
DISTRICT COUNCIL**PETITION FORM FOR SUBMISSION - CLASS 4 GAMBLING VENUE POLICY
SUBMISSION DUE 31 MAY 2019**

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NAME	ADDRESS	EMAIL	CONTACT PHONE
Keon Bell	84 Waiwaird Kiri		0216290133
Glenys Lang	Tatukaka 806 Patana Ntr Rd	glenys@gmail.com	694594454
Gina Struchbery	RDS Wly		
Daniel Kipa	24 Ormonde	Kirk Kipa@gmail.com	0211859657
Marie Kipa	24 Ormonde	Marie.dane.tallal@gmail.com	
Rick Parker	31 Highfield Way Whangarei		0274404212
Rina Rata	362 Takahiki Road, RD1 Whangarei		021321351
Sue Rata	362 Takahiki Road, RD1 Whangarei		094327879

From: cms@wdc.govt.nz
Sent: 27 May 2019 16:49:05 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Te Hiwi Preston - 2019-05-27

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Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

apped Policy if it is recommended as apart of the policy review process. I support the current W
DC Class 4 Gaming Policy (Sinking Lid Policy).

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

If you have supplied a valid email address, a copy of this completed form will be emailed to you. Otherwise please print a copy of it for your own records before you close this window.

*Submit Button - This button will become active when all mandatory fields are filled in (fields marked with *) and you click once on the button.*

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Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): Elizabeth Joy

Last name: Lee

Postal address: PO Box 7050 Tikipunga

Best daytime phone number: 09 437 3355 Mobile: 021 161 3884

Email: elizabethl@northhavenhospice.org.nz

I am writing this submission as an individual on behalf of an organisation

Organisation name: Acting CEO, North Haven Hospice.

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm - 3:00pm Tuesday 11 June 2019 Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

Be sure to get your written comments to us by **5.00pm on Friday 31 May**. Follow the instructions and provide your comments on the next page.

How to register and/or get this form to us

IN PERSON:

By visiting Customer Service desks at either: Forum North, Rust Ave, Whangarei, or Ruakaka Service Centre, Takutai Place, Ruakaka

or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz

Points to remember when making a submission

Please print clearly. The form should be easy to read and be understood, and may need to be photocopied.

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Please tell us your thoughts on the draft Class 4 Gambling Venue Policy below:

North Haven Hospice is non-government organisation and registered charity. We provide specialist palliative care to people with life limiting illness. Approximately 60% of our revenue is from the government via contract with the district health board. Grant income is a significant source of the other funding we must find each year to provide our services.

As a benefactor of the funds gained from gaming machines our income could be affected should the Council's current 'sinking lid' policy be retained.

We recognise the potential harm to individuals, families and the community from problem gambling. However, we do not believe all who use Class 4 gambling machines are problem gamblers.

The Council has already, in 15 or so years, reduced the number of class 4 venues by one third. We think it is time to change the policy to the 'cap' option where there could be the same number (or more) venues. We note there has been only one submission since 2003 to increase the number of machines in the Whangarei District which suggests the current number is about right for our community.

Feel free to add additional pages if required.

From: cms@wdc.govt.nz
Sent: 27 May 2019 13:50:31 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Joshua Port
 - 2019-05-27

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:
 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

Northland Basketball is a sports organization in the Whangarei district who rely on gaming trust funding to operate and to keep user pays fees to a realistic level, thereby maximising participation in our sport. The impact of the sinking lid, and loss of funding would be enormous, as our entire 14,000 individual/unique participants/members would feel the effect on service provision, what was being offered in their area as opposed to centrally offered, and would financially be a burden that many of our low socio-economic families can not afford.

Any loss of funding due to the sinking lid policy would significantly increase the likelihood that these our clubs would need to increase fees to enable them to sustain their current level of service.

Thank you for your consideration of this very important issue for the sport and recreation sector.

Yours Sincerely,

Josh Port

General Manager

Northland Basketball

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

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From: Mail Room
Sent: 31 May 2019 03:15:22 +0000
To: Mail Room
Subject: FW: Submission Form: Class 4 Gambling Venue Policy Amendments - Helen Smith - 2019-05-24

From: cms@wdc.govt.nz [mailto:cms@wdc.govt.nz]
Sent: Friday, 24 May 2019 9:15 AM
To: Mail Room <mailroom@wdc.govt.nz>
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Helen Smith - 2019-05-24

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Helen Smith

Postal Address:

PO Box 892, Whangarei, 0110

(This box will automatically expand)

* Best Daytime Phone Number:

094382400

(If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

0226738821

Email:

helens@northcricket.co.nz

(If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:

Northland Cricket Association

(Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

No

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

Without the funds that pokie trusts generate for distribution into the community, Northland Cricket Association would not be able to deliver the programmes and provide the services at the high level we do currently. We are a not for profit organisation, so rely heavily on grant funding in all areas of our organisation. We believe the sinking lid policy should be replaced with a cap on the number of machines set initially at the current machine numbers but with the provision for additional machines and venues to be licensed in line with population growth. If we continue to lose machines as venues close, for our organisation, you would see a big decline in junior and senior player numbers, which means less people involved and engaged in sport.

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

If you have supplied a valid email address, a copy of this completed form will be emailed to you. Otherwise please print a copy of it for your own records before you close this window.

*Submit Button - This button will become active when all mandatory fields are filled in (fields marked with *) and you click once on the button.*

All submissions are considered official information under the Local Government Official Information and Meetings Act, and may be published and/or made available to elected members and the public.

From: cms@wdc.govt.nz
Sent: 27 May 2019 09:23:27 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Stephen Cunis - 2019-05-27

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:
 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

From: cms@wdc.govt.nz
Sent: 30 May 2019 15:33:59 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Paul Ahlers
 - 2019-05-30

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:
 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

1.

2.

On Class IV Gaming Licences

1.

Under the Gambling Act 2003, class IV gaming venues are required to return a minimum 40% of net proceeds to a range of non-profit entities such as schools, amateur sports organisations, community service groups and the arts via charitable trusts.

2.

A further reduction of class IV gaming licences in the Whangarei District would risk transferring funds from organisations that benefit the community in a broad number of sectors.

A shift from the 'sinking lid' approach toward a cap on class IV licences based on factors such as population would allow Whangarei District Council to continue its control over the growth of class IV gambling and minimize the harm it causes, without potentially depriving non-profit community organisations within the Whangarei District a source of funding that they rely on to operate. Our trust has directly benefited from this funding in the past, and it has allowed us to continue to provide an essential community service.

Thank You.

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

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Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): OWEN

Last name: LIU

Postal address: 3 OTUHIWAI CRESCENT
TIKIPUNGA, WHANGAREI

Best daytime phone number: 02108873124 Mobile: _____

Email: manager@northlandfootball.net

I am writing this submission as an individual on behalf of an organisation

Organisation name: NORTHLAND FOOTBALL CLUB INCORPORATED

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

Be sure to get your written comments to us by **5.00pm on Friday 31 May**. Follow the instructions and provide your comments on the next page.

How to register and/or get this form to us

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or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

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Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz



**NORTHLAND FOOTBALL CLUB INCORPORATED
48 REED STREET, TIKIPUNGA, WHANGAREI**

23rd May 2019

**Re: Submission in Relation to Whangarei District Council's Proposed Class IV
Gambling Policy**

To whoever it may concern,

In light of the Council's review of its Class IV Gambling Policy, we wish to submit the following for your consideration as we believe they have direct or indirect implications for sports bodies such as Northland Football Club Incorporated and other non-profit entities in the Whangarei District-

On current Whangarei District Council policy

- i) The 'sinking lid' policy in place for the last fifteen years has undoubtedly allowed the District Council to effectively 'control the growth of class IV gambling' and 'minimise the harm caused by class IV gambling'.
- ii) In the last fifteen years, there has been a reduction of 13 venues across the District.

On Class IV Gaming Licences

- i) Under the Gambling Act 2003, class IV gaming venues are required to return a minimum 40% of net proceeds to a range of non-profit entities such as schools, amateur sports organisations, community service groups and the arts via charitable trusts
- ii) A further reduction of class IV gaming licences in the Whangarei District would risk transferring funds from organisations that benefit the community in a broad number of sectors

A shift from the 'sinking lid' approach toward a cap on class IV licences based on factors such as population would allow Whangarei District Council to continue its control over the growth of class IV gambling and minimize the harm it causes without potentially depriving non-profit community organisations within the Whangarei District a source of funding that they rely on to operate.

Thank you for taking the time to read this submission.

Yours Sincerely,

Owen Liiv
General Manager
Northland Football Club Incorporated



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s):	<u>John</u>		
Last name:	<u>Smith</u>		
Postal address:	<u>12 Nixon St.</u>		
Best daytime phone number:	<u>09 4377215</u>	Mobile:	<u>0274889906</u>
Email:	<u>johnasmith48@gmail.com</u>		
I am writing this submission	(<input checked="" type="checkbox"/> box)	<input type="checkbox"/> as an individual	<input checked="" type="checkbox"/> on behalf of an organisation
Organisation name:	<u>Northland Golf Club</u>		

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 (box) Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

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or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz

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Please tell us your thoughts on the draft Class 4 Gambling Venue Policy below:

Submission on behalf of NORTHLAND GOLF CLUB - Pipiwai Rd. - on the Draft Class 4 Gambling Venue Policy.

Northland Golf Club is reliant on funds granted to us from Community Trusts to assist in the purchase of

equipment, sand and fertiliser keep the standard of the course a a high level.

Northland Golf Club provides a public leisure facility that is a benefit to the wider northland community.

We are reliant on assisted funding from community trusts, in particular the Oxford Sports Trust.

These trusts derive their funding from the revenue received through proceeds from venues supporting poker machines.

We have noted that it is becoming harder to access these funds as the moneys available have diminished

due in part to the sinking lid policy adopted by the council.

We believe that should the council persist in their aim of reducing machines it will impact hugely, not only on us

at Northland Golf Club, but on all aspects of Northlands leisure community. It is most likely to lead to a user pays society

which will impact negatively on a large proportion of Northlands population.

Therefore, Northland Golf Club wishes to support a cap on venues which will ensure that the current funding level of

distribution to the local community is sustained.

We would like to suggest that within council policy provision be added to allow additional venues be added in

line with future population growth of the district.

Feel free to add additional pages if required.

Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): GRANT

Last name: MCLEOD

Postal address: 45 PARK AVENUE
KENSINGTON, WHANGAREI

Best daytime phone number: 09) 4373830 Mobile: 027) 431 5430

Email: grant@northlandhockey.org.nz

I am writing this submission (box) as an individual on behalf of an organisation

Organisation name: NORTHLAND HOCKEY ASSOCIATION

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

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Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz



"The Best Hockey experience in New Zealand"

28 May 2019
 Northland Hockey Association
 45 Park Avenue
 Kensington
 Whangarei

RE: Submission in relation to Whangarei District Council Proposed Class IV Gambling Policy

To Whangarei District Councilors

Considering the Council's review of its Class IV Gambling Policy we wish to make a submission as we believe this has direct implications for the Northland Hockey Association and other not-for-profit organisations in the Whangarei District.

We believe that the current 'Sinking Lid Policy' should be replaced with a cap at the current level of gaming machines with the allowance to grow with the population.

The Northland Hockey Association and its 2,700 members benefit from the funds that are redistributed into our community through Gaming Trusts.

A shift from the 'sinking lid' approach toward the capping approach would allow Whangarei District Council to continue its control over the growth of class IV gambling and minimize the harm it causes without potentially taking away a major funding source for not-for-profit organisations within the Whangarei District.

We rely on this funding to engage with the District's young people, for them to be active and they generally become good citizens within community.

Thank you for taking the time to read this submission.

Yours sincerely

Grant McLeod
 CEO
 Northland Hockey Association

From: cms@wdc.govt.nz
Sent: 21 May 2019 11:31:44 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Northland Multiple Sclerosis Society - 2019-05-21

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:

 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:

(Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission? No

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

ing machine licences, i.e. Pub Charity, Oxford Trust, Southern Trust and others with gambling machines in Whangarei. Therefore on behalf of our many members we do not want to see the Council make any changes to the current policy that would restrict or reduce in any way the number of currently approved or allocated gaming machines in the Whangarei District. To do so would have a severe impact on our levels of funding and any reduction in this would in turn affect the level of a much needed service that we provide to our community.

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

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Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): LLEW

Last name: SMART

Postal address: PO BOX 584
WHANGAREI

Best daytime phone number: _____ Mobile: 021 191 5845

Email: refereeadmin@northlandrugby.co.nz

I am writing this submission (✓ box) as an individual on behalf of an organisation

Organisation name: NORTHLAND RUGBY REFEREES ASSOCIATION

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 (✓ box) Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

Be sure to get your written comments to us by **5.00pm on Friday 31 May**. Follow the instructions and provide your comments on the next page.

How to register and/or get this form to us

IN PERSON:

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or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
 Whangarei District Council
 Private Bag 9023
 WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

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 or email us: mailroom@wdc.govt.nz

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Please tell us your thoughts on the draft Class 4 Gambling Venue Policy below:

WE ENDORSE THE SINKING BID POLICY BEING REPLACED WITH A CAP ON THE NUMBER OF MACHINES, SETT INITIALLY AT THE CURRENT MACHINE NUMBERS BUT WITH PROVISION FOR ADDITIONAL MACHINES AND VENUES TO BE LICENSED IN LINE WITH POPULATION GROWTH.

OUR ASSOCIATION (MADE UP OF VOLUNTEERS AND ONE PAID ADMINISTRATOR) RELIES HEAVILY ON FUNDING TO ENSURE WE CAN FUNCTION EFFECTIVELY AND PROVIDE REFEREES THROUGHOUT NORTHLAND.

WE ARE IMMENSELY GRATEFUL FOR THE VITAL FUNDING RECEIVED WHICH ALLOWS US TO DELIVER OUR SERVICES TO THE THOUSANDS OF RUGBY PLAYERS NORTHLAND - WIDE.

SHOULD THIS FUNDING STREAM BE REDUCED (AS MACHINE NUMBERS DROP AND APPLICATIONS FOR GRANTS INCREASE), WE, ALONG WITH OTHER SPORTING CODES AND ORGANISATIONS, WOULD FIND IT DIFFICULT TO DELIVER PROGRAMMES AND SERVICES TO THE DESIRED STANDARD

From: cms@wdc.govt.nz
Sent: 30 May 2019 09:06:29 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Alistair McGinn - 2019-05-30

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:
 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

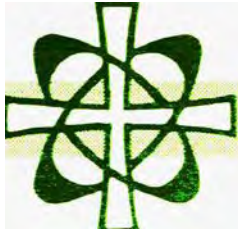
Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)



Northland

URBAN RURAL MISSION

P O Box 5098
Whangarei 0140
Telephone 027 3089 216
Email <Northland.Urban.Rural.Mission@gmail.com>

31 May 2019

Submission of NURM on WDC Gambling (Class 4) Policy

NURM wishes to be heard in the hearings on the draft Policy.

We endorse the submissions of Northland District Health Board and Manaia PHO.

NURM submits – because of the real harm that pokie gambling is proven to cause, and because of the increased amounts being spent on pokie gambling in Whangarei District – that:

- The sinking lid policy should be retained
- The relocation clause should be removed

We will elaborate on our submission at the oral hearings on the proposed policy.

With respect

Tim Howard, for the NURM Board

From: Mail Room
Sent: 31 May 2019 02:27:04 +0000
To: Mail Room
Subject: FW: Submission Form: Class 4 Gambling Venue Policy Amendments - Graham MacKinnon - 2019-05-28

From: cms@wdc.govt.nz [mailto:cms@wdc.govt.nz]
Sent: Tuesday, 28 May 2019 6:14 PM
To: Mail Room <mailroom@wdc.govt.nz>
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Graham MacKinnon - 2019-05-28

[Submitted by Anonymous User]

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Please enter your details:

* Full Name(s):

Graham MacKinnon

Postal Address:

30 Ross St

Onerahi

(This box will automatically expand)

* Best Daytime Phone Number:

0274916648

(If you do not have a daytime telephone number, please type N/A in the above box).

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0274916648

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grahammackinnon98@gmail.com

(If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:

Onerahi Bowling Club INC

(Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

No

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

The Onerahi Bowling Club INC is a sports Club with 115 members. The facility is also used by various other community groups such as the Lions, Probus, who hold their meeting at the Club and even the Council has used the for community meetings. We receive funding from the Oxford Sports Trust and on occasion from Pub Charities this funding allows us to maintain a great Sporting and Community facility for its members and the other community groups that use our facility. Without the funding we get from the Trust and charities that are funded by the Pokies we would financially struggle. As a Club we believe a fixed number of gaming machines in the Whangarei District would be the best policy for Class 4 Gambling, we believe a Sinkin

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From: cms@wdc.govt.nz
Sent: 28 May 2019 14:37:04 +1200
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Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Ian Bowick - 2019-05-28

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Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

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From: cms@wdc.govt.nz
Sent: 23 May 2019 16:53:25 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Grant
 Lindsay Currie - 2019-05-23

[Submitted by Anonymous User]

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Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

Oxford's submissions on Council's proposed Policy are in relation to:

1. The "sinking lid" on gaming machine numbers:

1.1 The sinking lid policy has resulted in a significant reduction in licensed machines within the District. Since 2003, the number of venues has reduced from thirty-three to twenty while the population has increased substantially.

1.2 Currently the total number of machines operating in the Whangarei District is 274. On a per capita basis, this is relatively low by national standards.

1.3 Any further reduction in machine numbers will reduce funds available for distribution by Oxford and other societies within Whangarei District.

Oxford's submission is that, rather than maintain the sinking lid policy, Council should adopt a cap on the number of machines. It is submitted that a cap of 300 machines would be appropriate at present with consideration being given on future policy reviews for the cap to be adjusted to reflect changes in population. Provision would need to be made in the Policy for new venues to be consented (maximum 9 machines per venue) until the cap is reached.

2. Relocation restrictions:

2.1 The current and proposed relocation policy appears to be misconceived in that it refers to matters affecting the owner/lessee of the site. In fact, the Class 4 venue licence is held by the corporate society which owns the machines, not the site operator (publican).

2.2 The policy should permit relocation by the society in appropriate circumstances which would include expiry of a lease/ redevelopment of a site but should also extend to any other matter which prevents the society from continuing to operate from an existing venue. An example would be the site operator (publican) simply choosing not to continue to accommodate the gaming machines at the venue. Oxford has recently experienced such a situation which has meant the loss of 9 machine venue with no ability to relocate.

2.3 The suggested amendment to the relocation policy should be applied whether or not there is a change from sinking lid to capped machine numbers.

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**SUBMISSION TO THE
WHANGAREI DISTRICT CLASS 4 GAMBLING VENUE POLICY**

CONTENTS

Introduction	1
Class 4 Gambling in New Zealand and Whangarei	1
Expenditure and national gambling trends	1
Gambling in Whangarei	2
Funding	2
What makes a good policy?	3
PGF recommendations on gambling policy	4
Social cost of gambling	4
Harmful gambling and children	4
Gambling and crime	5
Family violence	5
Economic degradation	5
Remedies to problem gambling	6
EGMs: location, density and deprivation	7
Vulnerability	7
The ethics of gambling funding	8
How pokie trusts work	8
Regressive nature of gambling funding	9
Impact of proposed policy on community funding	9
About PGF Group	10
Appendices	11
Appendix 1	11
Appendix 2	11
Appendix 3	12
Appendix 4	12

INTRODUCTION

Harmful gambling is a significant issue often overlooked in the context of public health and social wellbeing. Causing three times the harm to communities as drug use disorders, gambling has wide-ranging implications for individuals and their families including decreased health, emotional or psychological distress, financial harm, reduced performance at work or educational institute, relationship disruption (conflict or breakdown) and criminal activity.¹

PGF recommendations on effective gambling policy are founded on what is known about gambling harm across New Zealand, and following the recommendations is a comprehensive background on electronic gaming machines (EGMs), gambling harm in New Zealand and community funding.

The latest New Zealand National Gambling Study (NGS), published in 2018 with data from 2015, found that 0.2% of the sample adult population were problem gamblers, 1.8% were moderate-risk and 4.6% were low-risk gamblers.² A problem gambler experiences about half the quality of life of a regular person – roughly the same as someone with severe alcohol problems – and a low-risk gambler about 20% less than average.³

Measuring gambling harm is often referred to as the tip of the iceberg because each person with a gambling problem affects six other people.⁴ The Australian Productivity Commission Report (2010) stated that less than 15 percent of people impacted by gambling would attend traditional problem gambling services.⁵ Problem, moderate and low-risk gamblers account for 18, 34 and 48% of total harm respectively, creating severe situations at one end of the spectrum and wide-ranging deprivation at the other (Appendix 1). Individuals, families, friends, workmates, businesses and the community all suffer the negative outcomes of harmful gambling, which should be particularly noted in New Zealand because of its contribution to child poverty and impact on families at greater socio-economic risk.

Class 4 electronic gaming machines (EGMs or ‘pokies’) – those housed in pubs and clubs in the community as opposed to in casinos – are the most harmful form of gambling (Appendix 2). However, the most recent data on New Zealand gambling behaviour reported that in 2015, the vast majority of adults (87.2%)⁶ didn’t use any kind of pokie machine at all. This means the losses, over \$910 million to Class 4 gambling in 2018, come from a very small percentage of the population.

Misconceptions around the funding from gambling complicate the issue and it is time that councils and government take a closer look at the relationship between harmful gambling and social disparities, and the funding model which supports it.

CLASS 4 GAMBLING IN NEW ZEALAND AND WHANGAREI

Expenditure and national gambling trends

The expenditure on all forms of gambling in New Zealand in the 2017/18 financial year was \$2.383 billion; this continues a trend of increases in expenditure since 2009/10 (Appendix 3). Class 4 gambling accounted for 37.55% of the 2017/18 spend with \$895 million, a figure which has also risen each year since 2013/14.

As mentioned, EGMs are the major cause of gambling harm in New Zealand and the primary mode of gambling that people seek help for (Appendix 2). Over \$910 million was lost on pokies in the 2018 calendar year⁷ or \$2.42 million a day. A conservative estimate is 40% of pokie losses are incurred by those with a gambling problem.⁸ EGMs are also disproportionately located in the poorest areas. There are five times as many pokies in the most deprived areas of New Zealand as the least deprived areas.⁹

Of concern is the recent increase in pokie spend despite slowly but steadily falling numbers of EGMs and venues since the Gambling Act was introduced in 2003. EGMs are designed to be addictive, and

courageous council policies are required to reduce pokie numbers and therefore the harm they cause within communities.

Gambling in Whangarei

Based on 2013 Census information and data to March 2019 from the Department of Internal Affairs (DIA), there are 274 EGMs in Whangarei, one for every 209 adults, and each EGM took an average of \$62,872.46 from the district in the last reported 12 months. This is money that would otherwise be spent in the local economy on consumer goods, recreation and social activity.

- Over \$17.2 million was lost to EGMs in Whangarei in the 12 months to March 2019, or \$47,197 per day.
- The NGS found in 2015 that 8.2% of the adult population used EGMs in pubs once or more a year and 3.7% in clubs.
- The 2018 *Health and Lifestyles Survey* found that 5.5% of respondents (approximately 218,000 New Zealand adults) had experienced at least some level of individual gambling harm in the last 12 months. This equates to 3,144 people if we apply the national proportion to Whangarei as a guide.
- From the 2013 Census, the median income in Whangarei is \$25,300 per annum (\$3,200 less than the national average of \$28,500); that's \$486 per week, where the median rental is \$250 per week. That leaves \$236 (before tax) for food, power, petrol, the doctor, and clothes etc.
- The number of EGMs in Whangarei has fluctuated (Appendix 4), but there are 10% less than there were five years ago.
- The spend shows a recurring annual pattern, dipping in the Jan–March quarter but spiralling steadily upwards year by year:
 - the Jan–Mar 2019 quarter represents a decrease of \$103,735 (2.4%) from Oct–Dec 2018
 - Jan–Mar 2019 is up \$492,662 (11.5%) on the same quarter in 2018
 - the 12 months to March 2019 rose \$1,121,069 (6.5%) from the 12 months previous.

Funding

The benefits of community funding from EGMs need to be weighed against the social and financial costs of gambling harm in the area. Whilst there have been community grants generated from pokie funding and returned directly to the area, there are also grants that are distributed outside of the Whangarei district. Additionally, child neglect, poverty, family violence, fraud, poor mental health and loss of employment are all issues exacerbated by harmful gambling and are hugely damaging to society.

The financial return on money from EGMs is a poor investment and funding model. The provisional figure for the proportion of money returned to the community from Class 4 gambling across the country in 2018 is only 43.8% (an estimated \$346,463,945). The 43.8% return is calculated from an amount which is GST exclusive – meaning that 15% of the total money has already been paid in tax, taking the real contribution of the money lost to 38%.

When the losses from EGMs and the social costs are balanced against the benefit from community funding, this model is not sustainable. Many organisations are supported by funding from EGMs and are valued by their community. However, there needs to be more transparency around what groups are funded and from which communities. Gambling funding poses an important ethical question of

whether New Zealand should support a system which determines that some people are selectively benefited while others are substantially harmed.

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

“While there is little doubt about the community benefits associated with funding of the charitable sector, the policy rationale for compelling gamblers alone to make a special and very substantial contribution to funding these community benefits is rather unclear.

There is no reason to assume that gamblers have a particularly high ability to pay (a principled policy rationale for progressive income taxes) and thus might be better placed to support charitable purposes than the rest of the community. In fact, the opposite seems to be the case: gambling tends to be more prevalent in lower income households and, as noted in section 4.3, the concentration of gambling venues tends to be higher in areas of high deprivation. Therefore gambling taxation and redistribution to community purposes tends to be regressive, i.e., placing a higher burden on the less-well-off ... Some organisations take an ethical stance to not receive funds from gambling sources”.¹⁰

WHAT MAKES A GOOD POLICY?

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

The purpose of the Gambling Act is to:

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

Sinking lid is a term used in gambling control policies and has been adopted in varying forms by Territorial Local Authorities (TLAs). The purpose of a sinking lid policy is to reduce, over time, the number of machines operating within a specific area or district. A comprehensive sinking lid policy is where if a venue closes, the pokies cannot go to another venue and no new Class 4 licenses can be issued.

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

A sinking lid policy is compromised where machine relocation is permitted and/or venues and clubs are permitted to merge. Allowing EGMs to be moved around an area means the machine numbers

stay the same. Allowing mergers also enables the maintenance of existing numbers and risks creating 'pokie dens'. Research supports the argument that increased numbers of EGMs leads to increased problem gambling prevalence.¹¹ Whangarei has an opportunity to strengthen the sinking lid policy by removing the ability for venues to relocate. Instead of aligning the policy to allow more machines after a relocation, Whangarei could simply restrict relocations in line with the idea of the sinking lid. The graph at Appendix Four of this submission shows that EGM spend is increasing in Whangarei which means that the harm associated with the spend is increasing.

PGF RECOMMENDATIONS ON GAMBLING POLICY

PGF recommends the policy should also include the following two provisions:

- **No relocations:** If a venue with EGMs is forced to close or voluntarily closes, the council will not permit the EGMs to be relocated to any venue within the council area
- **No club mergers:** There will be no club mergers under any circumstances.

SOCIAL COST OF GAMBLING

Recent research confirms the broad proportion of New Zealanders experiencing gambling harm is higher than the prevalence for problem gambling (Appendix 1). One in six New Zealanders say a family member has gone without something they needed or a bill has gone unpaid because of gambling.¹² In results on second-hand harm from the 2018 Health and Lifestyles survey, 7% of adults (268,000) reported:

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

Broader harm for many is also critical harm for some. A number of studies have shown a clear link between problem gambling and suicidality¹³ and PGF regularly see people who have considered or attempted taking their own lives. Suicide is another acute phenomenon in New Zealand and should be carefully considered in terms of gambling policy making.

Harmful gambling and children

Children suffer greatly as a result of harmful gambling. They can regularly miss out on basic essentials if a parent has gambled away household money and there is a far greater risk the children of problem gamblers will inherit the same issue themselves.¹⁴

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

The children of problem gamblers can also suffer emotionally, and feelings of neglect can be a daily struggle. The parent may spend a great deal of time gambling, move out due to arguments about their gambling or disappear unpredictably. Their relationship with their child or children can be damaged as they become more secretive, unreliable and prone to breaking promises. The parent's personality can become unrecognisable to their children, who feel gambling has become more important than family.¹⁵

A study of gambling in Māori communities outlines a model of how children are at risk if gambling is part of their young lives. When exposed to gambling activities from an early age, children grow up seeing gambling as a normal activity and central to social life. They may be encouraged to participate

from a young age. Dysfunction at home, in the form of financial problems or domestic violence increases the risk that they will look to gambling for an escape. As they grow, their gambling may become more intense until it has become problematic.¹⁶

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

- Alcohol disorders (31% vs 4%)
- Major depression (19% vs 7%)
- Drug use disorders (5% vs 2%)
- Antisocial personality disorder (5% vs 0%)
- Generalised anxiety disorder (8% vs 0%)
- Any psychiatric disorder (50% vs 11%)¹⁷

Gambling and crime

Offending by gamblers has been investigated in a number of New Zealand and international studies. Despite difficulties in determining the extent of gambling-related crime and the causal pathways, it appears that problem gamblers are at high risk of committing crimes in order to finance their gambling activities.¹⁸

In 2008 a New Zealand study found that 25% of those engaged in criminal activity would not have done so if it had not been for their gambling. This suggests that a quarter of the relevant population, or about 10,000 people, committed illegal activities because of gambling.¹⁹

Studies of problem gambling and links to criminal activity suggest that much of the related crime goes unreported.²⁰ Apart from the financial cost of gambling-related crime to organisations and individuals directly involved, further serious consequences are experienced by problem gamblers and their families if they are convicted of criminal activities.²¹

A 2009 New Zealand study found that “gamblers and significant others believe that a relationship exists between gambling and crime” and “there is substantial unreported crime, a large proportion of which is likely to be related to gambling and that there are a large range of crimes committed in relation to gambling (particularly continuous forms of gambling), and not just financial crimes”.²² They suggest that 10% of people experiencing problem gambling and two thirds of those receiving counselling for gambling-related issues have committed a crime because of their gambling.

Family violence

The Ministry of Health and Auckland University of Technology have recently released research highlighting the links between problem gambling and family violence. Fifty per cent of participants (people seeking help from problem gambling services) claimed to be victims of family violence, and 44% of participants claimed to be perpetrators of family violence, in the past year.²³

Economic degradation

There is limited data and analysis regarding the economic impact of gambling in New Zealand. However, New Zealand and international research has revealed the losses offer a sharp contrast to the often celebrated economic gains. Money for gambling is diverted from savings and/or other expenditure, and can have a negative impact on local businesses and the economic health and welfare of whole communities.²⁴

Employment, normally considered a standard business cost, is framed within the gambling industry as a special benefit to the community. Even if gambling does create employment opportunities, a comparison of gambling and retail in terms of jobs created for every million dollars spent shows that gambling creates about half as many jobs as retail.²⁵ A 2008 report noted that jobs and economic

activities generated by gambling expenditure would exist elsewhere if that money was spent outside the gambling industry.²⁶

Remedies to problem gambling

A New Zealand study acknowledged there are many forces at play that can reduce problem gambling prevalence, including public health work, adaptation (when no new pokies are introduced) and policy. The report found strong support for the “access thesis,” which says that increases of non-casino pokies lead to an increase in problem gambling prevalence. The study found that there is an increase in problem gambling by nearly one person per each new machine.²⁷

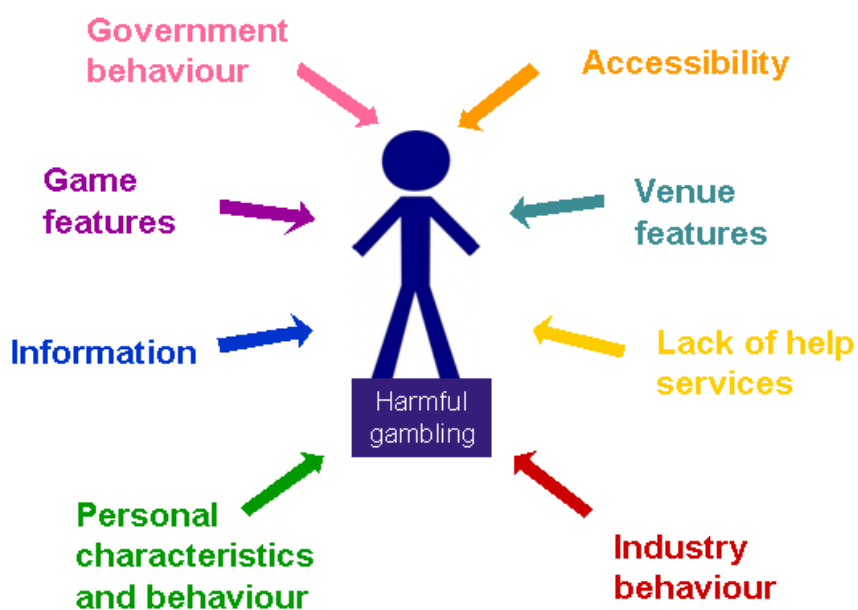
The report concludes that, “from the perspective of public policy, and particularly harm minimisation, holding or reducing electronic gambling machine numbers would appear to be prudent based on our findings, and is likely to lead to reduced harm both through reduced availability and by enabling adaptation processes.” The same study supported the view that restricting the per capita density of gambling machines leads to a decrease in gambling harm.²⁸

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

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

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

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



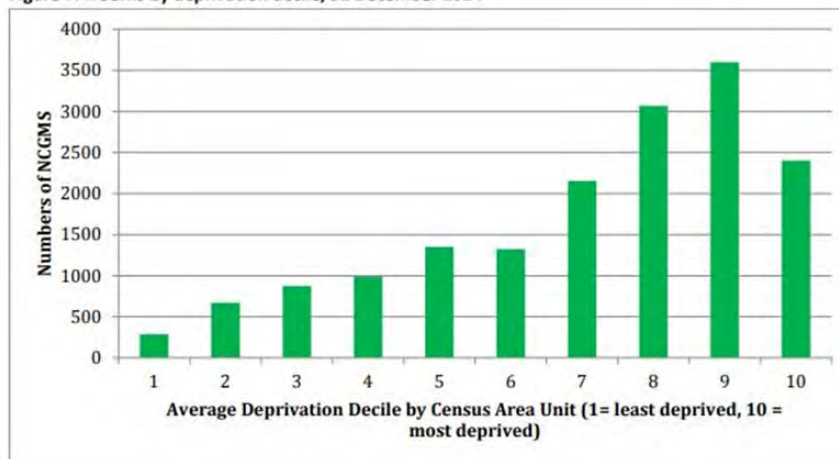
EGMS: LOCATION, DENSITY AND DEPRIVATION

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

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

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

Figure 7: NCGMs by deprivation decile, 31 December 2014



29

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

Affluent areas have a greater ability to resist the location of hotels and taverns in their communities; communities with high rates of home ownership tend to take a more long-term view of planning and zoning issues. Whatever the explanation, the location of venues tends to concentrate the social costs in communities that are less able to bear them.³⁰

Vulnerability

Factors contributing to being a risky gambler include ethnicity, deprivation, major life events, psychological distress, cannabis use and various gambling behaviours.³¹

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

Māori and Pacific people continue to have very high problem gambling prevalence rates. This means that unless more focus is placed on understanding why this is the case, and

*processes put in place to change the current situation, Māori and Pacific communities will continue to be disproportionately affected by gambling-related harm.*³²

- Māori populations comprise 31% of intervention service clients³³, but make up only 15% of the population.³⁴
- There has been a rise in the number of Māori women seeking help for gambling problems. Māori women seeking help for their gambling problems almost exclusively (85.6% in 2008) cite pokies as their problematic mode of gambling.³⁵
- Pacific populations comprise 21.2% of intervention service clients³⁶, but make up only 7% of the population.³⁷
- Problem gambling strongly linked to mental health state and disorders.³⁸
- Many problem gamblers also use tobacco, alcohol and other drugs.³⁹

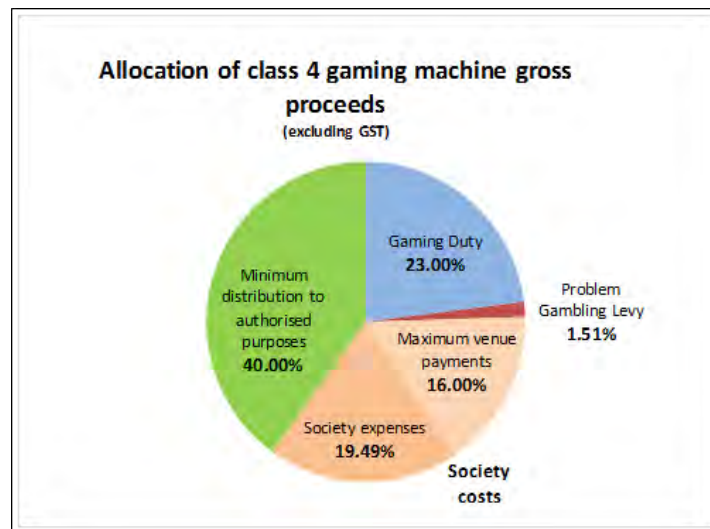
THE ETHICS OF GAMBLING FUNDING

How pokie trusts work

Pokie trusts were established under the Gambling Act (2003) in an attempt to offset harm by returning some of the profits in the form of community grants. Although the purpose of the trusts is to distribute money to the community, the purpose of gambling is not to raise money for the community, and it should not be perceived as such. Pokie machines are licensed to operate in pubs and clubs solely as a form of community fundraising⁴⁰ and licence holders must distribute their net proceeds to the community by way of grants.

Trusts and societies are currently required to distribute a minimum of 40% of their GST exclusive gross proceeds for each financial year according to the Gambling Regulations 2004 (Class 4 Net Proceeds: Part 2 Section 9 (1) and 10)).⁴¹

Legislation dictates that each dollar of gross proceeds (i.e. turnover [aggregate stakes] minus user winnings) must be distributed in accordance with the pie chart shown in the figure below.⁴² These include the fixed amounts towards gambling duty and the problem gambling levy.



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

While the grants made by community funding bodies like the New Zealand Lottery Grants Board are well documented, no comparable aggregate statistics are readily available for the allocation to authorised purposes of the profits of EGMs.⁴³

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

Regressive nature of gambling funding

Gambling generates significant funding for community purposes. However, gambling funding comes with a very high human cost and more equitable and less harmful forms of funding should be investigated. International and New Zealand studies have identified that gambling is sharply regressive. Income is effectively being redistributed away from low income communities.⁴⁴

One attraction for governments to collect public funding through gambling is that it appears to be "painless" or "voluntary" – meaning those contributing are less aware they are doing so through their participation in an activity not overtly framed as a form of taxation. The "painless voluntary donation" view has been criticised on grounds that it exploits the false hopes or financial risk-taking of those on lower incomes.⁴⁵

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

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

- 56.4% had nicotine dependence
- 18.2% alcohol abuse
- 15.2% alcohol dependence
- 11.5% cannabis use disorder⁴⁶

The same study also found “that nearly three quarters had either a current or past psychiatric comorbidity. The main current psychiatric disorders found were mood disorders (23.1%), alcohol use disorders (21.2%) and anxiety disorders (17.6%)⁴⁷ In other words, for a problem gambler, the contribution is not a voluntary or painless one.

Studies involving cost/benefit analysis have argued that the benefits from gambling for the majority of people are individually very small relative to the costs borne by the minority of people experiencing gambling harm.⁴⁸ People who are already socially and economically disadvantaged are most susceptible to gambling problems.⁴⁹

The revenue generated by gambling within a community is often spent in a more affluent community.⁵⁰ A 2004 study examining distribution of community benefit funding from six major pokie trusts found that more affluent areas (such as Central Auckland and the North Shore) were receiving considerably more funding per capita than the lower income areas (such as Manukau City).⁵¹ It is our experience that jazz festivals and sports fields in wealthier suburbs are well funded, while high deprivation suburbs are not.

Impact of proposed policy on community funding

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

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

Some groups have even argued that pokie handouts actually weaken community groups and that traditional fundraisers are much better at building community spirit and keeping sports and other groups strong.⁵²

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

There is no research to say that people move, or are moving from pokies to online gambling. The 2018 *Health and Lifestyles survey* shows that the proportion of New Zealanders gambling online via overseas websites has actually fallen since 2014.⁵³ Gambling clients report they do not experience the same ‘pull’ of online gambling as pokies. If a person has a problem with sports betting, for example, it does not necessarily follow that they will be harmed by pokies; a person addicted to online slot machines cannot be assumed to gamble harmfully when playing cards. Gambling behaviour cannot be generalised in this way.

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

ABOUT PGF GROUP

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

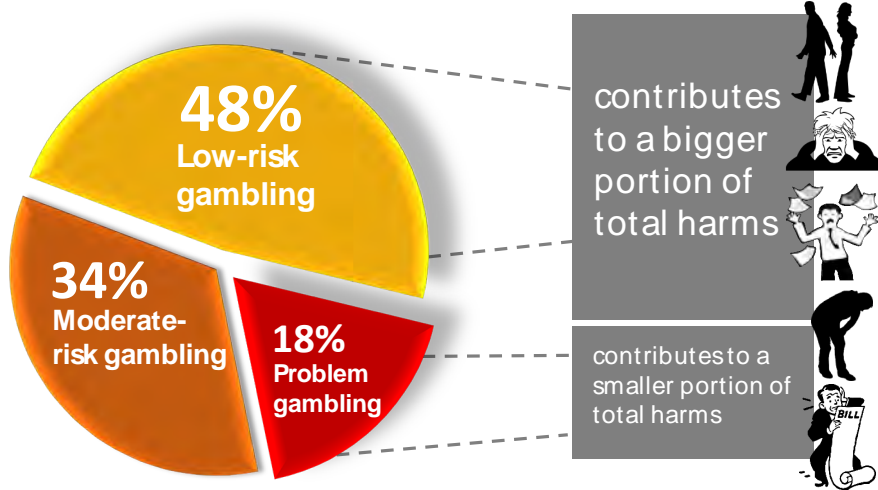
Asian Family Services provides free counselling and support in eight languages in face-to-face or phone settings and public health services for the Asian community. Asian Family Services operates from bases in Auckland and Wellington and supports clients working from Hamilton and by phone to Christchurch.

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

APPENDICES

Appendix 1.

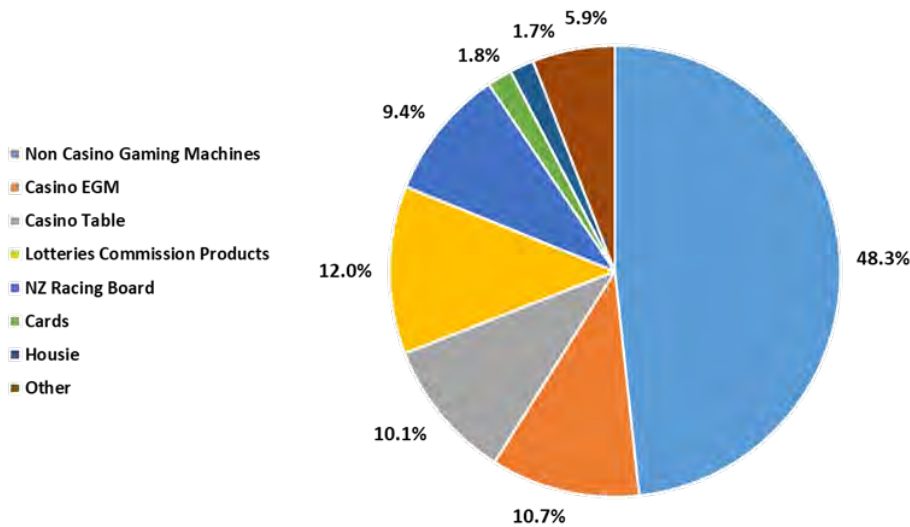
Central Queensland University and Auckland University of Technology. (2017). *Measuring the Burden of Gambling Harm in New Zealand*. Wellington: Ministry of Health.



Appendix 2.

Ministry of Health Manatū Hauora. (2018). *Clients assisted by primary problem gambling mode* [Excel spreadsheet]. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/service-user-data/intervention-client-data>

Clients assisted by primary problem gambling mode 2017/18



Appendix 3.

Department of Internal Affairs Te Tari Taiwhenua. *Gambling expenditure statistics* [PDF]. Retrieved from https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Gambling-Expenditure-Statistics

Gambling operators' key financial statistics (actual)

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



Te Tari Taiwhenua
Internal Affairs

Financial Year	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
NZ Racing Board (TAB)									
Expenditure	278	273	283	294	310	325	342	338	350
Prizes (dividends)	1,304	1,261	1,336	1,422	1,522	1,748	1,928	1,907	1,913
Turnover	1,583	1,533	1,619	1,717	1,833	2,073	2,270	2,245	2,262
NZ Lotteries Commission									
Expenditure	347	404	419	432	463	420	437	555	561
Prizes	436	521	529	515	526	473	537	652	686
Turnover	782	926	948	947	989	894	974	1,207	1,246
Gambling Machines (outside casinos)									
Expenditure	849	856	854	827	806	818	843	870	895
Prizes	8,316	8,365	8,395	8,166	7,976	8,141	8,550	8,931	9,154
Turnover	9,165	9,222	9,245	8,995	8,783	8,949	9,393	9,801	10,049
Casinos									
Expenditure	440	448	483	490	486	527	586	572	578
Total									
Expenditure	1,914	1,982	2,038	2,042	2,065	2,091	2,209	2,334	2,383

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

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

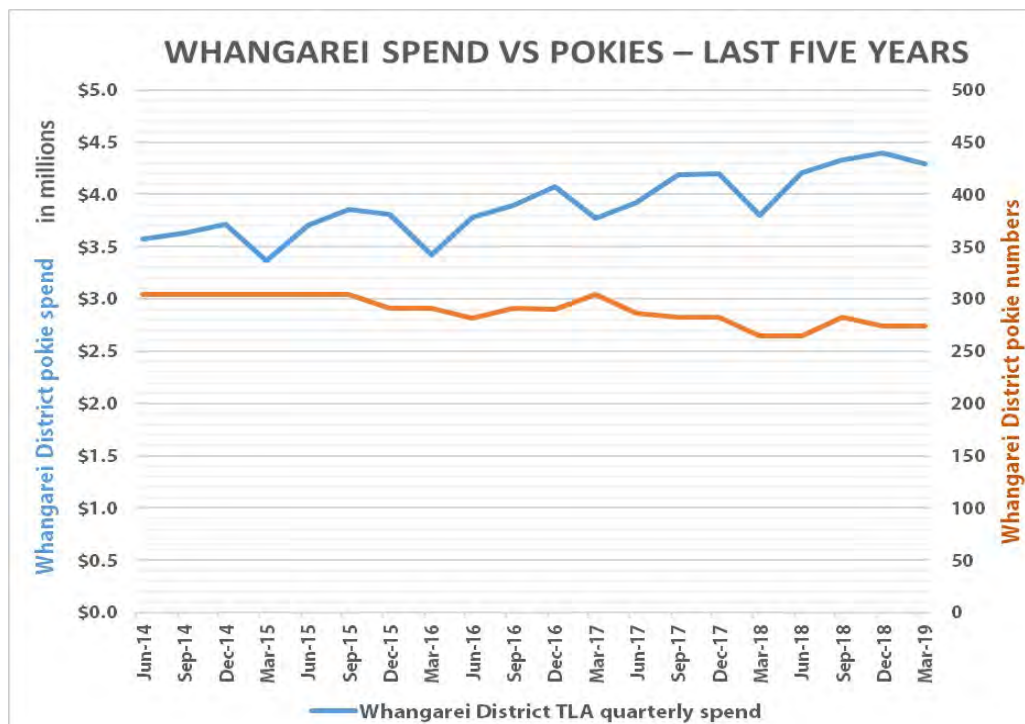
With each new release of this information, gambling operators review their previous years' data and, where necessary, provide revised. Please disregard previously released gambling expenditure statistics for the above financial years.

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

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

Appendix 4.

Money lost and pokie machine numbers are sourced from the Department of Internal Affairs Te Tari Taiwhenua. (2019). *Gaming Machine Venues, Numbers and Expenditure by Territorial Authority/District* [Excel spreadsheets]. Retrieved from <https://www.dia.govt.nz/Resource-material-Information-We-Provide-Gaming-Statistics>



- ¹ Central Queensland University and Auckland University of Technology. (2017). *Measuring the Burden of Gambling Harm in New Zealand*. Wellington: Ministry of Health.
- ² Abbott, M., Bellringer, M., & Garrett, N. (2018). *New Zealand National Gambling Study: Wave 4 (2015). Report number 6*. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.
- ³ Central Queensland University and Auckland University of Technology. (2017). *Measuring the Burden of Gambling Harm in New Zealand*. Wellington: Ministry of Health.
- ⁴ Goodwin, B. C., Browne, M., Rockloff, M. & Rose, L. (2017). A typical problem gambler affects six others. *International Gambling Studies*, 17:2, 276-289. doi: 10.1080/14459795.2017.1331252
- ⁵ Sapere Research Group. (2018). *Gambling Harm Reduction Needs Assessment*. Wellington: Ministry of Health.
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- ⁷ The Department of Internal Affairs Te Tari Taiwhenua. (2019). *Class 4 Gambling Key Performance Indicators*. Retrieved https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Class-4-Gambling-Key-Performance-Indicators?OpenDocument
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- ¹⁰ Sapere Research Group. (2018). *Gambling Harm Reduction Needs Assessment*. Wellington: Ministry of Health.
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- ¹² Abbott, M. W. (2012). Knowledge, views, and experiences of gambling and gambling-related harms in different socio-economic groups in New Zealand. *Australian and New Zealand Journal of Public Health*, 36(2), 153–159.
- ¹³ Moghaddam, J. F. (2015). Suicidal ideation and suicide attempts in five groups with different severities of gambling: Findings from the National Epidemiologic Survey on Alcohol and Related Conditions. *American Journal on Addictions*.
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- ¹⁶ As above.
- ¹⁷ Shaw, M. F. (2007). The effect of pathological gambling on families, marriages and children. *CNS Spectrums*, 12(8).

- ¹⁸ Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*. Auckland University of Technology. AUT Gambling and Addictions Research Centre, prepared for the Ministry of Health. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/problem-gambling/research-and-evaluation/implementation-2004-2007/formative-investigation-between-gambling-including-pg-and-crime-nz>
- ¹⁹ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ²⁰ Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*.
- ²¹ Productivity Commission 2010, *Gambling*, Report no. 50. Canberra, Australia.
- ²² Abbott, M. B. (2009). *Problem gambling: formative investigation of the links between gambling (including problem gambling) and crime in New Zealand*.
- ²³ Auckland University of Technology. (2017). *Problem Gambling and Family Violence in Help-Seeking Populations: Co-Occurrence, Impact and Coping*. Wellington: Ministry of Health.
- ²⁴ Harrison, B. (2007). *Casinos and regeneration: the story so far, briefing paper no. 1*. London: IPPR (Institute for Public Policy Research, UK).
- ²⁵ Per million dollars spent, gambling generates approximately 3.2 jobs while retail produces approximately 6.3. South Australian Centre for Economic Studies with the Department of Psychology, University of Adelaide. (2005). *Problem gambling and harm: Towards a national definition*. Victoria: Department of Justice. Retrieved from [http://www.gamblingresearch.org.au/CA256902000FE154/Lookup/GRA_Reports_Files1/\\$file/FinalReportPrinter.pdf](http://www.gamblingresearch.org.au/CA256902000FE154/Lookup/GRA_Reports_Files1/$file/FinalReportPrinter.pdf)
- ²⁶ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ²⁷ Abbott, M., Storer, J., Stubbs, J. (2009). Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australia and New Zealand with respect to concentration of electronic gaming machines. *International Gambling Studies*, 9(3), 225–244.
- ²⁸ As above.
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- ³⁰ Hancock, L., O’Neil, M. (2010). *Risky business: Why the commonwealth needs to take over gambling legislation* (Alfred Deakin Research Institute). Retrieved from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>; Francis Group. (2009). *Informing the 2009 problem gambling needs assessment: Report for the Ministry of Health Manatū Hauora*;
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- ³² As above

- ³³ For the period, July 2017–June 2018. Ministry of Health (2019). *Intervention Client Data: Clients assisted by ethnicity*. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ethnicity>
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- ³⁵ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
- ³⁶ For the period, July 2017–June 2018. Ministry of Health (2019). *Intervention Client Data: Clients assisted by ethnicity*. Retrieved from <https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#ethnicity>
- ³⁷ Statistics New Zealand (2019). *2013 Census – Major ethnic groups in New Zealand*. Retrieved from <https://www.stats.govt.nz/infographics/major-ethnic-groups-in-new-zealand>
- ³⁸ Sapere Research Group. (2018). *Gambling Harm Reduction Needs Assessment*. Wellington: Ministry of Health.
- ³⁹ As above
- ⁴⁰ Clubs are permitted to be societies and to operate their own machines in their own clubrooms. They are not required to make grants to other community organisations but can do so.
- ⁴¹ Government also receives tax revenue from gambling taxes and levies which it redistributes for public purposes. NCGM gambling machines are the largest source of tax revenue: 20% tax rate, 1.1% problem gambling levy and GST (Inland Revenue 2006).
- ⁴² Internal Affairs. (2016). *Pokies in New Zealand: a guide to how the system works*. Retrieved from [https://www.dia.govt.nz/Services-Casino-and-Non-Casino-Gaming-Gambling-in-Pubs-and-Clubs-\(Class-4\)#guide](https://www.dia.govt.nz/Services-Casino-and-Non-Casino-Gaming-Gambling-in-Pubs-and-Clubs-(Class-4)#guide)
- ⁴³ As above.
- ⁴⁴ Hancock, L. & O’Neil, M. (2010). *Risky business: Why the commonwealth needs to take over gambling legislation*. (Alfred Deakin Research Institute working paper 11). Retrieved from <http://www.deakin.edu.au/alfred-deakin-research-institute/assets/resources/publications/workingpapers/adri-working-paper-11.pdf>; Uniting Care Australia (2009), *Submission to the Productivity Commission Inquiry into Australia’s Gambling Industries*. Retrieved from http://www.unitingcare.org.au/images/stories/submissions/sub_productivity_com_gambling_may09.pdf
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- ⁴⁸ Centre for Social and Health Outcomes Research and Evaluation. (2008). *Assessment of the social impacts of gambling in New Zealand*. Retrieved from <https://www.health.govt.nz/system/files/documents/publications/social-impacts-gambling-nz08.pdf>
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⁵² Gamblefree Day prompts call for funding boycott. (2011 September 1). *ONE News*. Retrieved 29 January 2013 from <http://tvnz.co.nz/national-news/gamblefree-day-prompts-call-funding-boycott-4378621>; Inglis, S. (2011 August 20). Editorial: Gambling much bigger problem. *Bay of Plenty Times*; De Graaf, P. (2010 July 18). Pub: Ditching pokies worth the gamble. *Northern Advocate*. Retrieved 29 January 2013 from <http://www.northernadvocate.co.nz/local/news/pub-ditching-pokies-worth-the-gamble/3917450/>; Thomas, A. (2009 February 16). Rugby – ‘crisis meeting’ resuscitates Mangakahia. *Northern Advocate* Retrieved 29 January 2013 from <http://www.northernadvocate.co.nz/sport/news/rugby-crisis-meeting-resuscitates-mangakahia/3795053/>; McNeilly, H. (2008 July 31). Giving up pokie funding right call: Mission. *Otago Daily Times*. Retrieved 29 January 2013 from <http://www.odt.co.nz/news/dunedin/15633/giving-pokie-funding-right-call-mission>

⁵³ Health Promotion Agency. (2018). *Kupe 2018: Health and Lifestyles Survey* [Indicator: Online gambling on overseas website]. Retrieved from <http://kupe.hpa.org.nz/>

Ends.



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): Martin

Last name: Cheer

Postal address: PO Box 27-009
Wellington

Best daytime phone number: (04) 385 6100 Mobile: (0274) 715 745

Email: _____

I am writing this submission as an individual on behalf of an organisation

Organisation name: Pub Charity Limited

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

Be sure to get your written comments to us by **5.00pm on Friday 31 May**. Follow the instructions and provide your comments on the next page.

How to register and/or get this form to us

IN PERSON:

By visiting Customer Service desks at either: Forum North, Rust Ave, Whangarei, or Ruakaka Service Centre, Takutai Place, Ruakaka

or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz

Whangarei District Council
Gambling Venue Policy Review 2019

Submission of Pub Charity Limited

PO Box 27009

Wellington

Contact: Martin Cheer CEO

martin@pubcharitylimited.org.nz

(04) 385 6100

Executive Summary

Pub Charity Limited (PCL) currently operates 3 venues and 39 gaming machines in the Whangarei District (WDC) area. Between October 2017 and April 2019 PCL has distributed 325 donations totalling \$3,031,389.74, at an average of \$9,327.35 per donation, to charities not-for profits in and benefitting the Whangarei DC TLA.

The WDC is conducting the triennial review of its Class 4 Venue Policy for the period 2019-2021. This will be the Council's sixth opportunity to review this policy and Council staff are proposing to retain a sinking lid on future Class 4 venues and machine numbers while making minor administrative changes to other aspects of the policy.

There are currently a total of 15 pub and 4 club Class 4 venues in the WDC area.

These venue numbers represent a reduction of -40% from the 33 class 4 venues operating when the first sinking lid policy was introduced by the Council.

It should be noted that over the same timeframe in the WDC area there has been a significant increase in outlets, products, and spending, linked with other forms of community gambling, with expenditure on LOTTO and TAB products now exceeding the amount of money spent on Class 4 gambling.

In addition, there has been an unknown amount of gambling expenditure migrating to unregulated off-shore on-line gambling opportunities.

Sinking lids on Class 4 gambling have **NOT**;

- Controlled or reduce gambling in the community
- Resulted in a corresponding reduction in problem gambling prevalence

Sinking lids on Class 4 gambling **HAVE**;

- Reduced the amount of responsible gambling
- Reduced the amount of community funding available

Pub Charity opposes the policy as proposed as it is demonstrably not effective in delivering on the underlying policy objectives.

As an alternative Pub Charity invites the Council to consider establishing a cap on machine and venue numbers at their current levels.

Pub Charity would like to speak to these submissions.

The False Justification of Sinking Lid Policies

It is useful that the Council have been so clear on their reasoning for the proposed policy.

Council staff have recommended that the current sinking lid policy be continued based on the belief that the proposal represent the best solution to ensure;

- The growth of gambling is controlled
- That harm from gambling is minimised
- To allow those who gamble responsibly to do so

These objectives are of course both socially responsible and consistent with the purposes of the Act.

However, the underlying justifications for the proposed policy is the assumption that there is an immediate and linear relationship between exposure, that is the number of gaming machines per capita, and levels of gambling spend and problem gambling prevalence in a community.

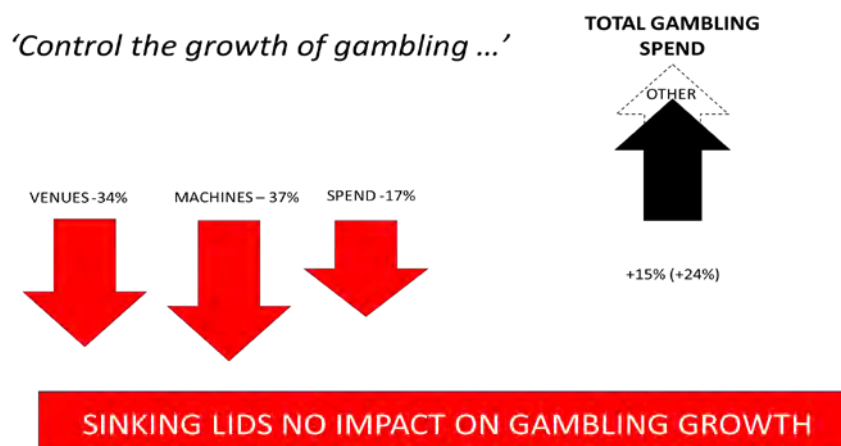
These assumptions are contrary to the evidence.

Controlling the 'growth' of gambling –

The proposed policy does not cover;

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

Despite a substantial reduction in infrastructure and expenditure for Class 4 gambling since the WDC has had a sinking lid in place total gambling expenditure has increased significantly.



Sinking lids - Exposure Theory and the Prevalence of Problem Gambling

As mentioned, Council policy staff are of the view that a sinking lid is required for the WDC policy. The underlying reason for that policy position is again the belief that there is a linear relationship between exposure to gaming machines and levels of problem gambling in the community.

There is no evidence that sinking lids have had any impact on problem gambling prevalence a fact recognised by researchers as long ago as 2006 as a false premise.¹

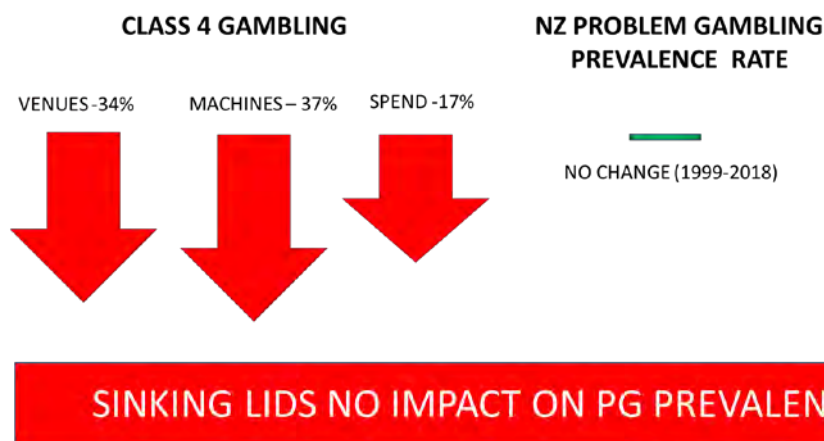
The current gambling legislation that enables local Government gambling venue policies, was introduced in 2004 before the emergence of high-speed domestic internet or smartphone technology.

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

Such thinking in 2019 is outdated.

The empirical evidence does not support the argument that reducing Class 4 venues and machines is an effective means of reducing gambling spend or problem gambling prevalence.

'Minimise harm ...'



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

Over that time total spending, in inflation adjusted terms, on community gaming machines fell in nominal terms by \$100M but in real terms, adjusted for inflation, by \$512M or 36% since 2004.

¹ 'Do Problem Gambling and EGM's Go Together Like a Horse and Carriage'; Abbot, M; 2006

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

Class 4 gaming machine numbers across New Zealand have fallen by over 8,000 and when population growth is considered the per capita ratio of machines to the population has fallen by over 50% since 2004.

With a 36% reduction in spend and a 50% reduction in exposure surely if this was a strategy for reducing gambling spending and harm there would be ample evidence.

There is none.

Submitters will still call for a continuation of the sinking lid claiming that reducing community gaming venues and machines leads to better health outcomes despite their being no evidence in Department of Internal Affairs reports on gambling spend and Ministry of Health statistics for problem gambling prevalence rates on a national or local level.

The problem gambling prevalence rate² in New Zealand, already some of the lowest in the world, stabilised in the 1990's and have remained unchanged.

Ministry of Health Reports on Problem Gambling Prevalence

After numerous and regular studies, the NZ Ministry of Health reports;

- *'From examination of the findings of other surveys, taking account of methodological differences and their likely impact, it is concluded that there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006.*
- *Again adjusting for the likely impact of methodological differences, it is concluded that the prevalence of lifetime probable pathological and problem gambling have probably not changed since the last time a lifetime assessment was made in New Zealand (1999).*
- *From examination of previous New Zealand prevalence studies it is considered likely that the prevalence of problematic gambling, both current and lifetime, within the range assessed as pathological, problem and moderate-risk, reduced significantly during the 1990s and has since stayed at about the same level.*
- *The above conclusion is consistent with the findings of a recent meta-analysis of prevalence studies conducted world-wide since the late 1980s; in all major world regions examined prevalence increased in association with increased gambling availability, especially casino gambling and EGMs, then levelled out and declined.'*³

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

² Canadian Problem Gambling Screen Index (CPGSI) 8+

³ NZ Ministry of Health, NEW ZEALAND 2012 NATIONAL GAMBLING STUDY: GAMBLING HARM AND PROBLEM GAMBLING, REPORT NUMBER 2, Provider Number: 467589, Contract Numbers: 335667/00, 01 and 02, 3 July 2014, Authors: Professor Max Abbott, Dr Maria Bellringer, Dr Nick Garrett, Dr Stuart Mundy-McPherson

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

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

Professor Max Abbot, AUT, 2006

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

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

Help Seeking is not a Proxy for Harm

The Gambling Commission has made it clear that presentation statistics are not a measure of the prevalence or incidence of harm.

*'... presentations are not a sound proxy for gambling harm.'*⁴

The Report initially agrees explaining the unreliability of the fluctuating help seeking statistics, which are for all forms of gambling not just class 4;

'There are difficulties in measuring whether the Policy has been effective in preventing and minimising harm caused by gambling.'

'This [increase in help seeking] may be the result of increased promotion for these services at particular times. There is some growth in the number of people seeking support, however this could be explained by increasing awareness levels about problem gambling, and associated support services.'

The unutilised gaming capacity under the current policy and the evidence of low risk based on spending, density and problem gambling prevalence (help seeking) should give the Council some comfort a more restrictive policy approach is not required.

The Benefit of Regulated Gambling Venues

Community gambling will either be undertaken in controlled and supervised environments or uncontrolled and unsupervised places, like on-line.

Rather than being something to suppress or prohibit, Class 4 venues represent a 'best case' scenario for the monitoring of intervention in gambling behaviour.

Class 4 Games must be approved and meet national specifications established by the Department of Internal Affairs. Unlike Casino gaming machines Class 4 bet sizes and prizes are limited at \$2.50 and \$1,000.00 and are unchanged since 1997. In Class 4 the use or issuing of credit to gamble is prohibited.

⁴ Regulatory Impact Statement: Problem Gambling Levy for 2016/17 to 2018/19, Department of Internal Affairs

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

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

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

After 12 years of such policies, and a reduction of over 8,000 community gaming machines there is no evidence that this has had any impact on reducing the already very low prevalence rate of problem gambling in New Zealand.



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

*'We are looking to attract more responsible gambling ... to double our active [TAB] accounts over the next couple of years.'*⁵

⁵ NZ Racing Board CEO John Allen, Sunday Star Times, November 12, 2017

'Join TAB Now & Get A Bonus \$20 When You Deposit \$10. Now You're In The Game. Live Odds Online. NZ's Only Betmakers. Multis Betting. Services: Sports Betting, Horse Racing, Multis Betting, Odds, Favourites.'

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

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

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

*'Interactive and online gambling is having devastating consequences; new gamblers are more easily recruited online and gambling sites are accessible 24 hours per day.'*⁶

The suggestion that the removal of gaming machines would resolve health outcomes for the most vulnerable ignores the complex nature of addictive disorders.

*'Almost three quarters (73.2%) of pathological gamblers had an alcohol use disorder, (38.1%) had a drug use disorder, (60.4%) had nicotine dependence, (49.6%) had a mood disorder, (41.3%) had an anxiety disorder, and (60.8%) had a personality disorder.'*⁷

The Purpose of Class 4 Gambling - Community Funding

Pub Charity Limited funding to organisations based in the WDC area since the last review is attached. Funding contributions to national organisations like Starship Foundation and St Johns have not been listed here but can be seen at www.pubcharitylimited.org.nz if required.

In addition to these funding outcomes PCL pays 33% of gaming machine proceeds, or \$30.9M per annum to central Government in taxes and duties and \$1.2M annually towards the costs of problem gambling research, intervention and public awareness.

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

⁶ The Royal Australian & New Zealand College of Psychiatrists, September 2017

⁷ The Journal of Clinical Psychiatry USA; Comorbidity of DSM-IV pathological gambling and other psychiatric disorders: results from the National Epidemiologic Survey on Alcohol and Related Conditions; May 2005

Summary

Empirical evidence contained in reports by the NZ Ministry of Health show that restrictive policies like sinking lids on class 4 gambling have had no impact on problem gambling prevalence in the community or on total gambling spend.

What they have achieved is reduced community funding and encouraged the migration of spending to other gambling activities.

PCL opposes the WDC Class 4 Gambling Venue policy as proposed and after 15 years of a sinking lid invites the Council to consider establishing a cap on machine and venue numbers at their current levels.

Pub Charity Donations to Whangarei District Oct 2017 - April 2019			
Date	Organisation name	Compliance Description	Amount (\$)
5/10/2017	Regent Community Trust	Replace the Manaia camp roof	\$ 26,000.00
27/10/2017	Anawhata Museum Trust	Canvas curtains and covers for gun	\$ 2,415.00
27/10/2017	Parent to Parent Northland	Wages	\$ 5,000.00
27/10/2017	Brain Injury Assn Northland Inc	Car lease	\$ 4,071.00
27/10/2017	Mairtown Tennis Club	Junior/Youth coaching for term 4	\$ 3,600.00
27/10/2017	T.S Diomedea Sea Cadets Whangarei	Adams Trimmer insurance bill	\$ 1,472.70
27/10/2017	Parua Bay School BOT	New pool pump and equipment	\$ 2,014.63
27/10/2017	Whangarei Girls High School BOT	Accommodation, entry fees and travel in Hastings	\$ 1,099.03
27/10/2017	Whangarei Golf Club Inc	John Deere tractor	\$ 10,000.00
27/10/2017	Bream Bay College	New pans and a case	\$ 2,500.00
27/10/2017	Kamo Cricket Club	Cricket balls for 2017/2018	\$ 3,408.00
27/10/2017	Ruakaka Recreation Centre	Replacing the 2 windows	\$ 1,770.45
27/10/2017	Parahaki Pony Club	Ribbon and a hire toilet	\$ 780.05
27/10/2017	Whangarei Water Ski Club Inc	Administration centre for tournament equipment and judging	\$ 5,000.00
27/10/2017	SPACE Northland	Tables, chairs and supply and installation of blinds	\$ 5,000.00
27/10/2017	Natural Phenomena	conference equipment	\$ 5,000.00
27/10/2017	Parklands Playcentre Kamo	Subsidise cost of sending members to The National Phenomena conference	\$ 1,000.00
4/12/2017	Bream Bay Hockey and Cricket Club	Match balls	\$ 1,988.00
4/12/2017	Marist Club Inc Whangarei	Hockey ground lease costs	\$ 1,656.69
4/12/2017	Onerahi Bowling Club	Chemicals and fertilisers for the green	\$ 4,395.00
4/12/2017	KartSport Whangarei	Build a new clubhouse	\$ 10,000.00
4/12/2017	Pouto Horse Sport Club	Building materials to build an extra 30 horse pens	\$ 3,844.94
4/12/2017	Maungakarama Cricket Club	New cricket balls	\$ 1,000.00
4/12/2017	Mangapai Playcentre	Repaint the centre roof	\$ 1,500.00
4/12/2017	Kamo Sports Charitable Trust	Tennis balls	\$ 510.00
4/12/2017	Springfield Tennis Club Inc	Professional Tennis Coach	\$ 897.00
4/12/2017	Marist Hora Hora Indoor Bowling Club	Hall hire	\$ 1,261.50
4/12/2017	Sanz Horahora Scout Group	Life jackets	\$ 2,484.76

4/12/2017	Whangarei Child Care Centre Inc	Software	\$ 4,905.00
4/12/2017	Onerahi Community Assn Inc	Xmas Santa parade expenses	\$ 2,440.00
4/12/2017	Horses for Healing Charitable Trust	100 Hay Bales	\$ 1,020.00
4/12/2017	Special Olympics Whangarei	Tenpin bowling training	\$ 5,000.00
23/01/2018	Bream Bay College	Transport Costs 5th-9th March 2018	\$ 7,235.00
23/01/2018	Bream Bay Swimming Club Incorporated	Pool hire	\$ 3,000.00
23/01/2018	CAPS Northland Incorporated	Professional supervision and travel expenses	\$ 2,320.00
23/01/2018	CCS Disability Action Northland Incorporated	Hyundai Tuscon vehicle	\$ 35,000.00
23/01/2018	North Haven Hospice Society Inc	Computer modems	\$ 3,800.00
23/01/2018	Northland Disabled Charitable Trust	Robo coupe Kitchen mixer	\$ 3,350.00
23/01/2018	Northland Justices of the Peace Association Incorporated	Costs to attend the annual conference of the Royal Federation	\$ 2,874.00
23/01/2018	Old Boys Marist Rugby Sports Club Whangarei Inc.	Bus travel for premier and premier reserves	\$ 2,278.26
23/01/2018	Pompallier Catholic College	20 Chromebooks	\$ 5,652.00
23/01/2018	Sistema Whangarei - Toi Akorangi	Instruments	\$ 4,079.50
23/01/2018	The Blue Goose Papermill Charitable Trust	Three months wages	\$ 19,181.50
23/01/2018	The Northland Emergency Services Trust	Installation of a hoist	\$ 214,770.00
23/01/2018	THE WHATITIRI CLAY TARGET CLUB INCORPORATED	Purchase of ammunition for use of the junior shooters taking part in the secondary school clay target competitions.	\$ 3,910.00
23/01/2018	Tikipunga High School	Assist in total cost of shade cover of new playground.	\$ 26,851.00
23/01/2018	Whangarei Adventure Racing Club Incorporated	5 x safety jackets	\$ 2,549.90
23/01/2018	Whangarei Amateur Swimming Club Incorporated	Accommodation and travel costs	\$ 5,700.00
23/01/2018	Whangarei Anglican Care Trust	Installation of CCTV	\$ 1,680.00
23/01/2018	YWCA of Whangarei	Insurance	\$ 10,908.39
20/02/2018	Bream Bay Swimming Club Incorporated	Accommodation costs	\$ 4,750.00

20/02/2018	Habitat for Humanity (Northland) Limited	Building materials, and associated costs for new home	\$ 35,500.00
20/02/2018	Hora Hora School (Te Mai)	Accommodation- Jackie Jones School of Dance	\$ 2,512.19
20/02/2018	Mairtown Tennis Club	Costs of junior / youth coaching for the first school term of 2018	\$ 4,000.00
20/02/2018	MARIST CLUB (WHANGAREI) INCORPORATED	Hockey Training ground fees	\$ 13,192.25
20/02/2018	Northland Indoor Bowling Centre Incorporated	Hall Hire	\$ 2,587.50
20/02/2018	Northland Multiple Sclerosis Society	Admin wages	\$ 3,360.00
20/02/2018	Northland Tennis Seniors	Accommodation costs	\$ 3,558.00
20/02/2018	Ocean Beach Boardrider's Club Incorporated	Coach training	\$ 2,950.00
20/02/2018	Onerahi Central Cricket Club Incorporated	Junior cricket coaching and development	\$ 5,692.50
20/02/2018	Onerahi Soccer Club Incorporated	First kicks, fun football and full kit	\$ 5,750.00
20/02/2018	Squash Northland	Entry fees and coaching costs	\$ 2,402.18
20/02/2018	The Bach (Whangarei) Incorporated	Upgrade the security system	\$ 2,365.00
20/02/2018	Whangarei Girls' High School	Beekeeping and safety equipment	\$ 469.54
20/02/2018	Whangarei Harmony Chorus Incorporated	Registration fee and accommodation costs	\$ 4,536.00
20/02/2018	Whangarei Indoor Bowling Association Incorporated	programme booklets for 2018 season	\$ 165.50
20/02/2018	Whangarei Junior Rugby Management Board Incorporated	Uniforms	\$ 2,550.00
16/03/2018	Alzheimers Society Northland Incorporated	Salary	\$ 11,500.00
16/03/2018	Bowls Northland Incorporated	Cost of prizes for our annual awards	\$ 5,000.00
16/03/2018	Citizens Advice Bureau Whangarei Incorporated	3 x computer desktops	\$ 1,470.00
16/03/2018	He Puna Marama Charitable Trust	Attendance at the Secondary Schools Kapa Haka Competition from 01.07.2018 - 07.07.2018	\$ 8,100.00
16/03/2018	Kauri Indoor Bowling Club	Prizes for the two triples tournaments to be held in 2018	\$ 360.00
16/03/2018	Mangakahia Rugby Club Incorporated	New playing jerseys, balls and other various training equipment	\$ 10,976.75
16/03/2018	Maungatapere Interdenominational	Church restoration and maintenance	\$ 70,317.73

	Memorial Church Committee		
16/03/2018	Ngunguru Indoor bowling Club	Cost of hall hire	\$ 1,350.00
16/03/2018	Northwave Amateur Swim Club	Accommodation, transport and entry fees	\$ 11,272.10
16/03/2018	Onerahi Central Cricket Club Incorporated	Cricket balls	\$ 2,791.00
16/03/2018	Onerahi Indoor Bowling Club	Hall hire for 2018	\$ 867.00
16/03/2018	Poroti School	Interactive e-learning, Publishing and communication	\$ 4,830.00
16/03/2018	Ruakaka Recreation Centre (Incorporated)	Scaffolding and temporary fencing	\$ 8,555.04
16/03/2018	Tai Tokerau Maori Netball Action Committee	Travel expenses - Bus	\$ 13,574.00
16/03/2018	Wahine Works	Venue performance rights, travel and transport costs	\$ 19,129.80
16/03/2018	Waipu Primary School BOT	Kapahaka costumes	\$ 2,421.83
16/03/2018	Whangarei Girls' High School	Accommodation and travel	\$ 1,986.95
18/04/2018	Fantastic Gymnastics Incorporated	Speith springboard and vault table	\$ 11,570.00
18/04/2018	Firebirds Northland Potters Society Incorporated	New Kiln	\$ 8,250.00
18/04/2018	Living Theatre Charitable Trust	Venue hire x 4	\$ 5,778.00
18/04/2018	Manaia View School	Laser cutter	\$ 9,469.75
18/04/2018	Mangapai Hockey Club Inc	40 senior playing strips and 100 junior playing strips	\$ 5,750.00
18/04/2018	Model Aviation Northland Incorporated	Club infrastructure	\$ 5,194.03
18/04/2018	Northland Youth Theatre Trust	Weekend workshop	\$ 3,700.00
18/04/2018	Onerahi Pool Club	Uniforms and accessories	\$ 2,240.10
18/04/2018	Onerahi Resource Centre	Reprint of brochures for the heritage trail of Onerahi	\$ 2,000.00
18/04/2018	Onerahi Volunteer Brigade	Northland Fire Brigades 2018 Fire camp	\$ 4,474.00
18/04/2018	Tai Tokerau Emergency Housing Charitable Trust	Supply and installation of steel/metal/aluminium posts for front and back gates	\$ 4,875.65
18/04/2018	Te Manu Aute Trust	Communication portal 'hub'	\$ 6,290.00
18/04/2018	The Hora Hora Rugby Union Football Club Whangarei Incorporated	Replacement of the dance floor	\$ 48,644.00
18/04/2018	Whangarei District Brass Incorporated	Venue hire, advertising and guest artist fuel	\$ 2,041.30

18/04/2018	Whangarei Girls' High School	Accommodation and travel	\$ 4,601.43
18/04/2018	Whangarei Girls' High School	Accommodation, entry and travel	\$ 6,304.08
18/04/2018	Whangarei Golf Club Incorporated	Clear three lakes of the water lily plants	\$ 5,390.00
18/04/2018	Whangarei Group Riding for the Disabled Incorporated	New water pump system	\$ 5,768.77
18/04/2018	Whangarei Heads School BOT	2018 whole school art exhibition	\$ 1,595.21
18/04/2018	Whareora Indoor Bowling Club Incorporated	Prizes - 19.05.2018	\$ 200.00
23/05/2018	Anawhata Museum Trust	Lean-to-Shed funding	\$ 65,000.00
23/05/2018	CAPS Northland Incorporated	Travel and clinical resource list of items	\$ 2,470.00
23/05/2018	Forum North Childcare and Education Centre Incorporated	Spring loaded roll down blinds and clear in fill panels	\$ 16,586.18
23/05/2018	Habitat for Humanity (Northland) Limited	Employment of a part time Build Manager for our Home Repair programme - Salary	\$ 47,627.20
23/05/2018	Mangakahia Sports Ground Society	Playground	\$ 44,805.00
23/05/2018	Ngatiwai Trust Board	Assist Ngatiwai Kaumatua attend the Kapa Haka Festival	\$ 2,737.60
23/05/2018	North Haven Hospice Society Incorporated	Bariatric patient lifting hoist	\$ 13,138.20
23/05/2018	Northland Football Club Incorporated	Leasing minibuses	\$ 36,011.01
23/05/2018	Northland Indoor Bowling Centre Incorporated	Players shirts	\$ 1,575.50
23/05/2018	Northland Paraplegic & Physically Disabled Association Incorporated	New electronic digital devices	\$ 1,862.26
23/05/2018	Northland Rugby Union Incorporated	Travel, accommodation, venue hire and team wear	\$ 97,282.42
23/05/2018	Onerahi Tennis Club Incorporated	Lighting poles and installation costs	\$ 7,000.00
23/05/2018	Parent to Parent - Northland	Wages	\$ 9,295.00
23/05/2018	Parua Bay Playcentre	Equipment and resources for the playcentre	\$ 6,083.69
23/05/2018	Pompallier Catholic College	15 jackets	\$ 1,127.40
23/05/2018	Sail Northland Charitable Trust	2 RS Feva dinghies	\$ 20,339.13
23/05/2018	Sherwood Park Golf Club	Tee seed fertiliser	\$ 7,400.00
23/05/2018	Tauraroa Area School BOT	Bus hire costs	\$ 1,900.00

23/05/2018	Whangarei Academy of Gymnastics Incorporated	Pit edge matting and first aid training	\$ 6,546.77
23/05/2018	Whangarei Budgeting Service Incorporated	17 triton polo shirts	\$ 1,005.43
23/05/2018	Whangarei Theatre Company Incorporated	Replacement Dot 2 Core stage lighting desk with adapter & hub	\$ 5,222.00
20/06/2018	Bream Bay College	Kitchen appliances	\$ 18,231.77
20/06/2018	Bream Bay College	Travel costs	\$ 482.76
20/06/2018	Fideliter Netball Club Incorporated	Hireage of Northland College (indoor gym), 42 training balls, 7 match balls and 15 new uniforms	\$ 4,619.02
20/06/2018	Kokopu School Board Of Trustees	Construct a cycle track for the local community	\$ 6,150.00
20/06/2018	Manaia Junior Rugby League	18 jerseys and shorts for the 2018 season	\$ 1,831.10
20/06/2018	Mangapai Playcentre	Replace shade sails	\$ 1,864.71
20/06/2018	Natural Phenomena Incorporated	Hireage of conference equipment	\$ 7,094.00
20/06/2018	North Coast Boardriders Club Incorporated	Gazebos, teardrop flags and youth wetsuits	\$ 5,042.94
20/06/2018	Northland Hockey Association Incorporated	Travel expenses	\$ 4,800.00
20/06/2018	Northland Multiple Sclerosis Society Incorporated	Wages	\$ 3,640.00
20/06/2018	Northland Squash Rackets Association Inc	Entry fees and accommodation costs	\$ 2,848.00
20/06/2018	Parklands Playcentre	To attend the Natural Phenomena Conference 2018	\$ 2,521.74
20/06/2018	Pines Golf Club Incorporated	Fertilisers and chemicals	\$ 9,280.00
20/06/2018	Sport Northland	Community Connector wages	\$ 40,000.00
20/06/2018	Whangarei Golf Club Incorporated	Golf cart batteries	\$ 5,200.00
20/06/2018	Whangarei Intermediate School	Transport costs	\$ 3,200.00
20/06/2018	Whangarei Netball Centre Incorporated	2018 Representative programme - attending National tournaments Under 17 and Under 19s	\$ 10,200.00
20/06/2018	Whangarei Roller Skating Club Incorporated	Accommodation	\$ 1,600.00
26/07/2018	Bream Bay Swimming Club Incorporated	Winter coaching fees	\$ 4,875.00
26/07/2018	Central Northland Science And Technology Fair Society Incorporated	Printing of programmes, judges lunches and stationery plus other expenses	\$ 2,231.19

26/07/2018	City Cricket Club Incorporated	Junior cricket gear for the 2018/19 cricket season	\$ 3,973.38
26/07/2018	Dress For Success (Northland) Incorporated	6 months of Executive Manager salary, 5 months rent and operating costs and rates	\$ 29,034.00
26/07/2018	Hora Hora Broncos Rugby League Club	September tournament - Transport, accommodation, uniform and health & safety equipment for under 11s team	\$ 21,260.00
26/07/2018	Matarau School	New uniforms and spots for the Kapa Haka group	\$ 4,514.70
26/07/2018	Ngunguru School Board Of Trustees	Transportation expenses	\$ 4,778.00
26/07/2018	Northland Cricket Association Incorporated	New playing kit for the 1st and 2nd XI Northland Representative teams	\$ 5,000.00
26/07/2018	Northland Football Club Incorporated	Match day kit	\$ 1,394.43
26/07/2018	Northland Rugby Referees Association Incorporated	Uniform socks, gear bags, jerseys, whistles, wrist straps and on field training aids	\$ 21,630.40
26/07/2018	Onerahi Resource Centre	Made for corflute and printing costs for the True Tales book	\$ 2,000.00
26/07/2018	Pompallier Catholic College	Accommodation and travel	\$ 3,352.17
26/07/2018	Ruakaka Surf Life Saving Patrol Incorporated	Knee boards for Junior surf	\$ 8,975.00
26/07/2018	Te Puawaitanga Maree Trust	Refurbishing of kitchenware and utensils	\$ 15,532.00
26/07/2018	Whangarei Migrant Centre Incorporated	Professional speaking course	\$ 3,250.00
22/08/2018	Bethel Church New Zealand Trust	New kitchen	\$ 29,636.94
22/08/2018	CCS Disability Action Northland Incorporated	Alarm system for premises at Kamo Road, Whangarei	\$ 14,800.00
22/08/2018	Kamo High School Board of Trustees	Accommodation	\$ 7,325.00
22/08/2018	Mangakahia Squash Club	Travel and accommodation	\$ 7,332.00
22/08/2018	Maungakaramea Cricket Club Incorporated	Upgrading our artificial nets	\$ 19,000.00
22/08/2018	Maungakaramea Playcentre	Replacing the outdoor patio blinds	\$ 13,932.00
22/08/2018	Maungakaramea Primary School Board Of Trustees	Purchase and installation for 'Innovative Learning Environment Upgrade Furniture'	\$ 20,964.00
22/08/2018	North Haven Hospice Society Incorporated	New four wheel drive	\$ 27,565.22
22/08/2018	Northland Basketball Incorporated	Vehicle costs for staff	\$ 10,000.00

22/08/2018	Northland Emergency Services Trust	Labour costs for the S-76 C++ helicopter upgrade/modification project	\$ 100,000.00
22/08/2018	Northland Jumping And Show Hunter	Costs of the officials - judges, course designers, time keepers, official steward, official ground jury chief and official technical delegate	\$ 4,957.40
22/08/2018	Northland Powerlifting And Body Building Association Incorporated	New competition Eleiko rack and weights	\$ 2,711.92
22/08/2018	Northland Residential Nursery and Creche Society	Starline UD dishwasher	\$ 5,250.00
22/08/2018	Northland Surfing Association Incorporated	Accommodation, van hire, entry fees and team clothing	\$ 9,336.82
22/08/2018	Parihaka Sports Club Incorporated	New uniforms and a set of goalie gear	\$ 5,324.71
22/08/2018	Sport Northland	Security system upgrade, Imop, heartstart AED and technology equipment for ASB stadium and lounges	\$ 58,278.52
22/08/2018	Totara Grove School	30 chromebooks	\$ 16,950.00
22/08/2018	Whananaki School Board Of Trustees	New playground	\$ 190,000.00
22/08/2018	Whangarei Flying Club	50% costs of a new microlight aircraft	\$ 60,000.00
22/08/2018	Whangarei Golf Club Incorporated	Half yearly cost of coring of the greens	\$ 8,015.86
22/08/2018	Whangarei Junior Rugby Management Board Incorporated	Expenses related to the ASB Leisure centre	\$ 2,967.56
19/09/2018	Bream Bay College	Travel	\$ 1,153.80
19/09/2018	CAPS Northland Incorporated	Professional supervision for the clinical team and half the annual cost of the Social Services database Excess	\$ 2,395.00
19/09/2018	Habitat For Humanity (Northland) Limited	Branded uniforms for staff and volunteers	\$ 2,247.10
19/09/2018	Hikurangi School Board Of Trustees	Camp	\$ 2,299.13
19/09/2018	Kara Hall Committee	Cover the costs of sanding and repairing the hall floor	\$ 4,381.25
19/09/2018	Mitamitaga O Le Pasefika Vaa-alo Canoe Club Incorporated	Paddles, safety equipment, uniforms and gear bags	\$ 14,888.50
19/09/2018	Morningside School Board of Trustees	Set of chromebooks	\$ 10,190.32
19/09/2018	Mt Manaia Bowling Club Incorporated	Costs of agrichemicals and soil to maintain bowling greens	\$ 4,837.88

19/09/2018	Ngunguru Tennis Society Incorporated	Two new tennis nets and four cartons of tennis balls	\$ 1,420.00
19/09/2018	Northland Basketball Incorporated	Operational costs - office rental, phone costs, internet costs and other operational expenditure	\$ 12,500.00
19/09/2018	Northland Community Foundation	Set up fees and first years monthly fees for the CRM database	\$ 11,870.00
19/09/2018	Northland Cricket Association Incorporated	2018/2019 Annual insurance premium	\$ 10,000.00
19/09/2018	Northland Indoor Bowling Centre Incorporated	Costs for prizes and engraving the trophies	\$ 483.60
19/09/2018	Northland Junior Cricket Incorporated	Accommodation costs	\$ 6,000.00
19/09/2018	Northland Rugby Referees Association Incorporated	7 x sets on-field training aids (communication devices)	\$ 13,825.00
19/09/2018	Onerahi Bowling Club (Inc)	Replace the drapes in the clubhouse	\$ 5,840.00
19/09/2018	Onerahi Central Cricket Club Incorporated	Pre season coaching services	\$ 2,000.00
19/09/2018	Onerahi Tennis Club	Tennis balls	\$ 3,060.00
19/09/2018	Shiloah Christian Ministries Incorporated	Supply and installation of shade coverings and canopy	\$ 16,487.00
19/09/2018	Tikipunga Association Football Club Incorporated	Prize giving - Supply and engraving of trophies, chilli bags, mugs, beer coolers, medals, glass handles and glass goblets	\$ 4,730.00
19/09/2018	Whangarei Girls' High School Board Of Trustees	Musical instruments for the junior department	\$ 6,960.45
19/09/2018	Whangarei Group Riding for the Disabled Incorporated	Shoeing and hoofcare of horses for one year	\$ 9,000.00
24/10/2018	Bream Bay Swimming Club Incorporated	Bream Bay College pool hire	\$ 4,600.00
24/10/2018	Creative Northland	New event equipment	\$ 5,883.80
24/10/2018	Hurupaki School Support Group	Printing costs	\$ 3,987.85
24/10/2018	Kamo High School Board of Trustees	Van hire	\$ 1,600.00
24/10/2018	Kauri Indoor Bowling Club	Prizes for the two triples tournaments	\$ 360.00
24/10/2018	Mairtown Tennis Club Incorporated	Costs of Junior / youth coaching	\$ 4,160.00
24/10/2018	Marist Club (Whangarei) Incorporated	Football ground lease costs for 2018	\$ 2,647.83
24/10/2018	Marist Club (Whangarei) Incorporated	Football ground lease costs	\$ 682.00
24/10/2018	Maunu Tennis Club Incorporated	Junior tennis coaching	\$ 4,173.91

24/10/2018	Northland Basketball Incorporated	Operational costs including office rental, phone costs, internet costs and other operational expenditure	\$ 12,500.00
24/10/2018	Northland Evangelical Movement (Inc)	Installing a water filtration	\$ 5,000.00
24/10/2018	Northland Miniature Horse Club Incorporated	Ribbons, garlands and trophies	\$ 2,358.00
24/10/2018	Northland Residential Nursery And Creche Society	Starline UD dishwasher	\$ 5,250.00
24/10/2018	Northland Squash Rackets Association Inc	To develop a Squash Northland Regional facilities plan	\$ 5,600.00
24/10/2018	Pehiaweri Maori Church and Marae Incorporated	Whare Whakairo (carving) project	\$ 30,000.00
24/10/2018	Regent Community Trust	Christmas meal and entertainment	\$ 2,713.00
24/10/2018	Ruakaka Surf Life Saving Patrol Incorporated	Replacement inflatable rescue boat motor	\$ 6,276.00
24/10/2018	Springfield Tennis Club Incorporated	Professional coach for the juniors for the 8 weeks	\$ 897.00
24/10/2018	Tauraroa Area School Board Of Trustees	Costs of musical instruments	\$ 9,400.00
24/10/2018	Tikipunga High School	Accommodation costs	\$ 4,260.87
24/10/2018	Whangarei BMX Club Incorporated	School challenge event - Gazebos, sports first aid kit, bmx medals and bmx gloves	\$ 3,171.96
24/10/2018	Whangarei Heads Community Library Society Incorporated	New computer, new printer, new barcode scanner, fiction and non-fiction books	\$ 3,483.00
24/10/2018	Whangarei Indoor Bowling Association Incorporated	Xmas pairs tournament - Meat vouchers as prizes	\$ 500.00
24/10/2018	Whangarei Parents Centre Incorporated	Three months rent costs	\$ 1,500.00
24/10/2018	Whau Valley School Board Of Trustees	32 x chromebooks	\$ 11,824.00
28/11/2018	Alzheimers Society Northland Incorporated	Salaries - Community Adviser	\$ 10,000.00
28/11/2018	CAPS Northland Incorporated	Donation to assist with travel expenses	\$ 1,500.00
28/11/2018	Citizens Advice Bureau Whangarei Incorporated	Office supplies - Pens and business cards	\$ 544.25
28/11/2018	Hikurangi Bowling Club Incorporated	Prizes for club events for the 2018-19 season	\$ 4,500.00
28/11/2018	Hikurangi Golf Club Incorporated	Gorse spraying	\$ 800.00
28/11/2018	Kaihu Valley Rugby Football Club Incorporated	Cones, balls, equipment bag, ropes, hurdles, sideline	\$ 3,287.00

		equipment, and jackets, and training clothing	
28/11/2018	Kamo Amateur Swimming Club Incorporated	Pool hire	\$ 2,093.00
28/11/2018	Kamo Baptist Church	Install heating and ventilation into the community spaces of the building	\$ 12,152.00
28/11/2018	Kamo Tennis And Sports Club Incorporated	Tennis balls	\$ 765.00
28/11/2018	Mangapai Hockey Club Incorporated	100 playing strip shirts	\$ 5,175.00
28/11/2018	Marist Hora Hora Indoor Bowling Club	Annual hall hire	\$ 1,334.00
28/11/2018	Ngunguru Golf Club Incorporated	Signage	\$ 1,090.00
28/11/2018	Northland Paraplegics And Physically Disabled Association	Office space tenancy costs	\$ 1,200.00
28/11/2018	Onerahi Community Association Incorporated	Costs to run the Xmas/Santa Parade	\$ 2,440.00
28/11/2018	Onerahi Primary School Board Of Trustees	Year 6 camp - Activity fees and transportation	\$ 5,319.13
28/11/2018	Parakao Hall Society Incorporated	Costs of materials and installation for a secure perimeter fence	\$ 3,507.50
28/11/2018	Pompallier Catholic College	20 chromebooks	\$ 6,800.00
28/11/2018	Ruakaka Recreation Centre (Incorporated)	New LED lights with sensors	\$ 2,975.00
28/11/2018	Tai Tokerau Emergency Housing Charitable Trust	Furnishing of two emergency housing properties and 1 x shipping container	\$ 27,595.97
28/11/2018	Waiotira School Board of Trustees	Two 65inch ActiveStations	\$ 21,790.00
28/11/2018	Whangarei Golf Club Incorporated	Ball washers and mounting pipes	\$ 3,996.00
28/11/2018	Whangarei Netball Centre Incorporated	Year 7 and 8 development programme	\$ 9,256.38
28/11/2018	Whangarei Repertory Society Incorporated	Two heat pumps	\$ 3,877.63
24/01/2019	Bream Bay Swimming Club Incorporated	Accommodation	\$ 6,120.00
24/01/2019	Hora Hora School Board Of Trustees	School camp accommodation	\$ 2,002.60
24/01/2019	Kamo Rugby And Squash Club Incorporated	Installing a gas hot water heating system	\$ 9,200.00

24/01/2019	Kokopu School Board Of Trustees	Build an in-ground retaining wall and drainage to fit new trampoline	\$ 4,998.00
24/01/2019	Marist Club (Whangarei) Incorporated	Football gear and player kit	\$ 3,404.07
24/01/2019	Maungatapere School Board Of Trustees	EOTC week adventure forest experience	\$ 1,326.00
24/01/2019	Midwestern Rugby Union And Squash Club Incorporated	Full set of playing gear for the Senior Rugby team for the 2019 season	\$ 3,400.00
24/01/2019	Ngunguru Indoor Bowling Club	Hall hire for the 2019 season	\$ 1,978.00
24/01/2019	Northable Matapuna Hauora	Annual rent of premises	\$ 12,000.00
24/01/2019	Northland Football Club Incorporated	Club's ground rental for 2018 season	\$ 1,195.65
24/01/2019	Ocean Beach Boardrider's Club Incorporated	6 new learner boards	\$ 3,894.00
24/01/2019	Old Boys Marist Rugby & Sports Club (Whangarei) Incorporated	Training and match balls for the Premier and Premier Reserve teams for the 2019 Rugby season	\$ 885.00
24/01/2019	Onerahi Rugby Football Club Inc	Replacing the roof and spouting	\$ 22,125.00
24/01/2019	Squash Northland	Develop a Northland Regional Squash facilities plan	\$ 5,600.00
24/01/2019	Te Kowhai Print Trust	Administration salary	\$ 18,225.00
24/01/2019	Volunteering Northland	One year of weekly adverts and a full advert in three local papers	\$ 3,430.00
24/01/2019	Whangarei Academy of Gymnastics Incorporated	Floor - tumble track, beat board and beam adjustable height	\$ 12,315.00
24/01/2019	Whangarei Boys' High School	Master toolkit	\$ 8,695.65
24/01/2019	Whangarei Boys' High School	Library shelving	\$ 2,705.95
24/01/2019	Whangarei Boys' High School	Chromebooks	\$ 19,000.00
24/01/2019	Whangarei Boys' High School	Basketballs	\$ 1,706.00
24/01/2019	Whangarei Boys' High School	Y12 Geography Tongariro trip - Transport	\$ 3,043.48
24/01/2019	Whangarei Boys' High School	Social Studies Waitangi trip - transport	\$ 1,191.30
24/01/2019	Whangarei Rowing Club Incorporated	Accommodation and car hire	\$ 3,387.01
24/01/2019	Whatitiri Clay Target Club Incorporated	Ammunition	\$ 8,541.81
20/02/2019	Achieve 2B Trust	Operational costs for the Wellington branch	\$ 1,404.78

20/02/2019	Bowls Northland Coaching Association	Prizes for the annual tournament	\$ 695.65
20/02/2019	Bowls Northland Incorporated	Four gold stars	\$ 1,019.14
20/02/2019	CAPS Northland Incorporated	Costs of professional supervision and travel expenses	\$ 2,275.00
20/02/2019	Collaborationz Trust	Professional photography	\$ 4,300.00
20/02/2019	Habitat For Humanity (Northland) Limited	Two sets of bike tools	\$ 2,835.00
20/02/2019	Maungakaramea School Board Of Trustees	Computers	\$ 4,284.03
20/02/2019	Multicultural Whangarei Incorporated	Te Reo classes for three months	\$ 2,940.00
20/02/2019	North End Indoor Bowling Club	2019 hall hire	\$ 1,242.00
20/02/2019	Northland Disabled Charitable Trust	Upgrade of the air conditioning system	\$ 16,285.00
20/02/2019	Northland Football Club Incorporated	Gear and equipment for youth team training and games - 2019 and 2020 seasons	\$ 5,617.41
20/02/2019	Northland Indoor Bowling Centre Incorporated	Hall hire	\$ 2,852.00
20/02/2019	Northland Kindergarten Association Incorporated	Adult wet weather gear for the Ngahere programme	\$ 2,042.54
20/02/2019	Northland Squash Rackets Association Incorporated	Costs of the Junior quadrangular tournament	\$ 5,390.00
20/02/2019	Onerahi Football Club Incorporated	New and replacement playing kits	\$ 8,195.00
20/02/2019	Regent Community Trust	Audit and utilities bill	\$ 4,980.00
20/02/2019	Tikipunga High School	Travel and entry costs	\$ 2,956.52
20/02/2019	Whangarei Boys' High School	Volleyball Tournament - transportation and accommodation	\$ 2,481.74
20/02/2019	Whangarei Harmony Chorus Incorporated	Half registration costs and full accommodation for twenty two members competing at the NZ Sweet Adelines Convention to be held in Dunedin	\$ 6,780.00
20/03/2019	Anawhata Museum Trust	Audit account costs	\$ 1,500.00
20/03/2019	Hikurangi Hockey Club Incorporated	Replace playing shirts for the Premier Womens team	\$ 1,035.00
20/03/2019	Kauri Indoor Bowling Club	Prizes for the Two triples tournaments	\$ 360.00
20/03/2019	Mangapai Hockey Club Incorporated	JMC shorts	\$ 2,395.57
20/03/2019	North Haven Hospice Society Incorporated	Running costs of community nurses' cars	\$ 4,000.00
20/03/2019	Northland Golf Club Incorporated	Greens mower	\$ 35,000.00

20/03/2019	Northland Multiple Sclerosis Society Incorporated	3 months administration wages	\$ 3,640.00
20/03/2019	Northland Multiple Sclerosis Society Incorporated	Vehicle	\$ 11,990.00
20/03/2019	Northland Tennis Seniors	Accommodation costs	\$ 2,274.00
20/03/2019	Northwave Amateur Swim Club Incorporated	Team Manager and swimmer costs to attend National Age Groups Championships	\$ 15,344.91
20/03/2019	Onerahi Bowling Club (Inc)	Heat pump	\$ 4,943.77
20/03/2019	Onerahi Resource Centre	Setting up and printing of the second book - The True Tales Of Onerahi	\$ 13,000.00
20/03/2019	Poroti School BOT	In-ground trampoline	\$ 2,582.00
20/03/2019	Pukenui/Western Hills Forest Charitable Trust	Promotional embroidered shirts and banners	\$ 1,702.40
20/03/2019	Whangarei Parents Centre Incorporated	3 months rent - April, May, June 2019	\$ 1,500.00
16/04/2019	Bream Bay College	Transport costs	\$ 1,173.92
16/04/2019	BUDDY'S BIRD SANCTUARY CHARITABLE TRUST	Cost of bird seed	\$ 6,767.24
16/04/2019	KAMO RUGBY AND SQUASH CLUB INCORPORATED	Medical strapping tape and first aid supplies	\$ 1,882.00
16/04/2019	Mangakahia Rugby Club Incorporated	Junior rugby fees	\$ 3,208.70
16/04/2019	Mangakahia Sports Ground Society Incorporated	Childproofing for the balustrades	\$ 33,530.00
16/04/2019	Ngunguru Bowling Club Incorporated	Annual insurance	\$ 1,265.90
16/04/2019	Northland Area Girls' Brigade	Registration fees and air fares	\$ 2,052.00
16/04/2019	NORTHLAND SURFING ASSOCIATION INCORPORATED	Coaching	\$ 2,760.00
16/04/2019	Onerahi Primary School Board Of Trustees	Accommodation and activity fees for Year 5 camp	\$ 4,956.52
16/04/2019	Otangarei Knights Rugby League Club	Costs of entire junior strips of uniforms	\$ 5,812.20
16/04/2019	PARUA BAY AND DISTRICTS COMMUNITY CENTRE SOCIETY INCORPORATED	Costs of the lighting upgrade	\$ 6,905.40
16/04/2019	Pompallier Catholic College	20 chromebooks	\$ 6,800.00
16/04/2019	SENIORNET BREAM BAY INCORPORATED	Four delegates to the federation AGM - travel	\$ 1,200.00

16/04/2019	The Blue Goose Papermill Charitable Trust	13 weeks wages	\$ 23,017.80
16/04/2019	Titoki Playcentre	Permanent shade structures	\$ 11,321.00
16/04/2019	WHANGAREI GOLF CLUB INCORPORATED	Ongoing upgrade of the course fairways specifically tees	\$ 3,838.44
16/04/2019	Whareora Indoor Bowling Club Incorporated	Cost of prizes for our day tournament	\$ 368.00
Total	325	Average \$9,327.35	\$ 3,031,389.74

SUBMISSION
TO THE WHANGAREI DISTRICT COUNCIL
ON
“PROPOSED CLASS 4 GAMBLING VENUE POLICY”

To: Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148
mailroom@wdc.govt.nz

27 May 2019

Thank you for the opportunity for the Public and Population Health Unit, Northland DHB to make a submission on the draft “Class 4 Gambling Venue Policy” for Whangarei District.

The submission is from the Medical Officers of Health, Public and Population Health Unit of Northland District Health Board (NDHB), Whangarei. Medical Officers of Health are public health physicians who provide independent specialist advice on matters that relate to population health. Northland Public and Population Health Unit (the Unit), one of 12 in New Zealand, is the only provider of comprehensive, regional public health services in Northland. The Unit has an overall statutory role to improve, promote and protect the health of Northlanders.

We support the proposed “Class 4 Gambling Venue Policy” with a ‘sinking lid’ approach and have made recommendations to further strengthen it. We wish to be heard in support of our submission.

Contact details:

Dr José M Ortega, Medical Officer of Health
Anil Shetty, Public Health Strategist

Public and Population Health Unit, Northland DHB
Private Bag 9742, Whangarei 0148
Ph: 09 – 430 4100 Fax: 09 – 430 4492
Jose.OrtegaBenito@northlanddhb.org.nz
Anil.Shetty@northlanddhb.org.nz



OUR SUBMISSION:

While most people limit gambling to a form of entertainment, a significant group of people in our community will face moderate to severe problems in relation to gambling. Problem gambling is a social and health issue in New Zealand that causes substantial problems for gamblers and the people around them, including their family, whanau, friends and work colleagues and the wider community. It is often the most vulnerable members of our community who suffer these devastating effects, which include loss of income, employment, and family breakdown.¹

Problem gambling refers to gambling that significantly interferes with a person's basic occupational, interpersonal, and financial functioning.² Pathological gambling is the most severe form and is classified as a mental disorder with similarities to drug abuse including features of tolerance, withdrawal, diminished control, and relinquishing of important activities.²

Gaming machines (pokies) are considered to be the most harmful form of gambling as 77% - 85% of problem gamblers use them as their primary mode of gambling.³ Two in five regular pokie players already have a gambling problem or at risk of developing one.⁴

Gambling problems affect not only the gamblers themselves, but also their families and the wider community (Figure 1).

Figure 1: Social Impacts of Gambling (source PGF NZ)⁵

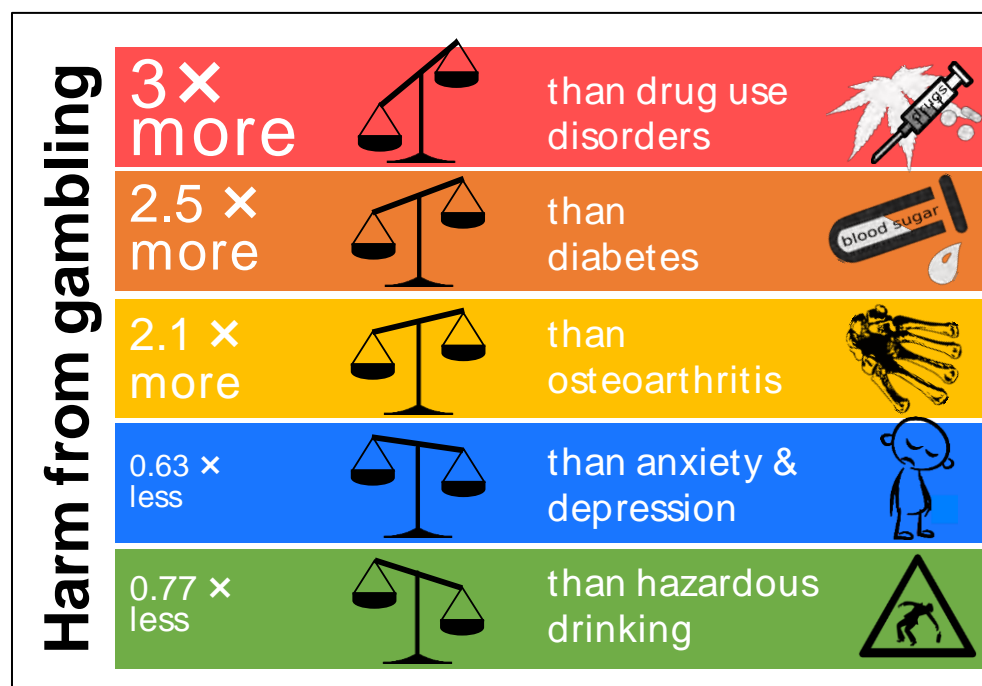


Problem gambling for Māori is a significant health issue, further compounding existing health problems tangata whenua experience and increasing the social and health disparities which exist between Māori and non-Māori.⁶

Moderate-risk/problem gamblers are more likely to lose significantly higher amounts than the low-risk and non-problem gamblers.⁷ For example between 2012 and 2015, the monthly expenditure by moderate-risk/problem gamblers on pokie machines was \$92 (pub) and \$110 (club). However, low-risk gamblers spent \$45 (pub) and \$25 (club) and non-problem gamblers spent \$25 (pub) and \$22 (club).⁷

A Ministry of Health's research to assess the aggregate 'Burden of Harm' caused by gambling with reference to different levels of problem gambling, and other comparable health conditions estimated that the total burden of harm occurring to gamblers is greater than common health conditions (such as diabetes and arthritis)(Figure 2).⁸ The results of the study also indicate that the burden of harm is primary due to damage to personal and family relationships, emotional/psychological distress, disruptions to work/study and financial impacts.⁸

Figure 2: Harm from problem gambling as compared with other health conditions



New Zealand research reflects that some demographic features can identify those at greater risk of problem gambling.⁹ Drawing on these features, Whangarei District is at risk of greater impacts of problem gambling due to:

- A relatively high proportion of Māori residents (29% as compared to 16% nationally)¹⁰
- Large proportion of population living in areas with high NZ Deprivation Indices (8-10)¹¹

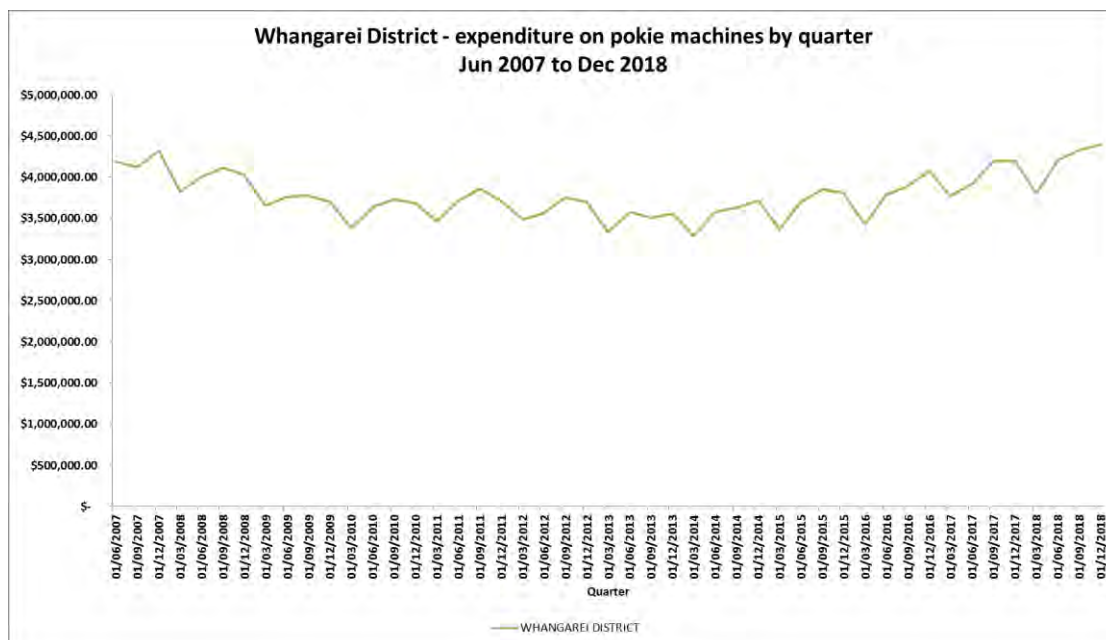
There are some positive economic impacts of gambling (pokie machines) in terms of the potential for gambling funds to support local communities and non-governmental organisations. However, a Social Impact Assessment (SIA) commissioned by Whangarei District Council in 2006 showed that there was a net economic loss to Whangarei community of \$4.7 million dollars, even after taking into account the gambling funds returned to the community.¹²

GAMBLING IN WHANGAREI DISTRICT:

Since 2013 the number of gaming venues and machines (pokies) in Whangarei District have been decreasing.¹³ There were 304 pokies (3.6 pokies per 1,000 people) during March 2013 and in December 2018, there were 274 pokies (3 pokies per 1,000 people) in the District.¹⁴ The 2018 pokie numbers per 1,000 people were similar to New Zealand numbers (i.e., 3 pokies per 1,000 people).¹⁴

However, it should be noted that the spending on pokies has been steadily increasing since 2013 (from 13.9 million to 16.7 million dollars per year). (Figure 3)¹⁵ There was also an increase in spending on pokies across the country by 12% but the increase was much higher in Whangarei District at 20%.¹⁵

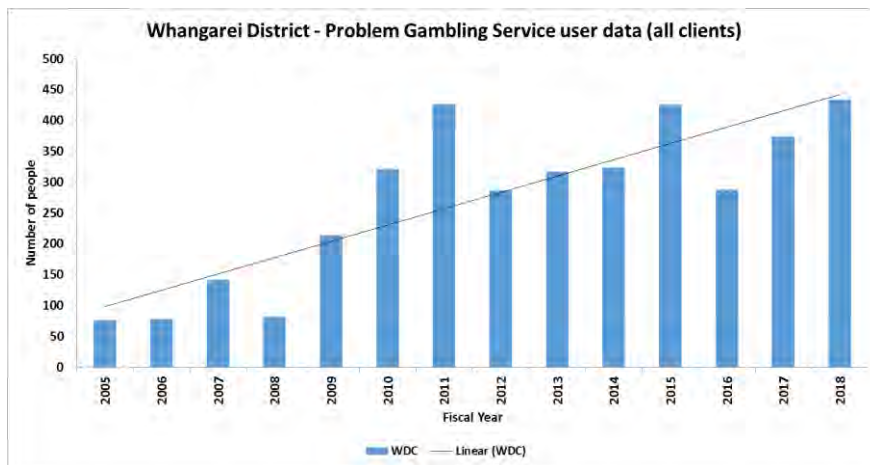
Figure 3: Expenditure on pokie machines - Whangarei District (2007 to 2018)



The increase in spending on the pokie machines indicates that the burden of problem gambling is increasing rather than decreasing in Whangarei District.⁷ Most of the pokie machines in the District are located in areas with a high number of vulnerable population.

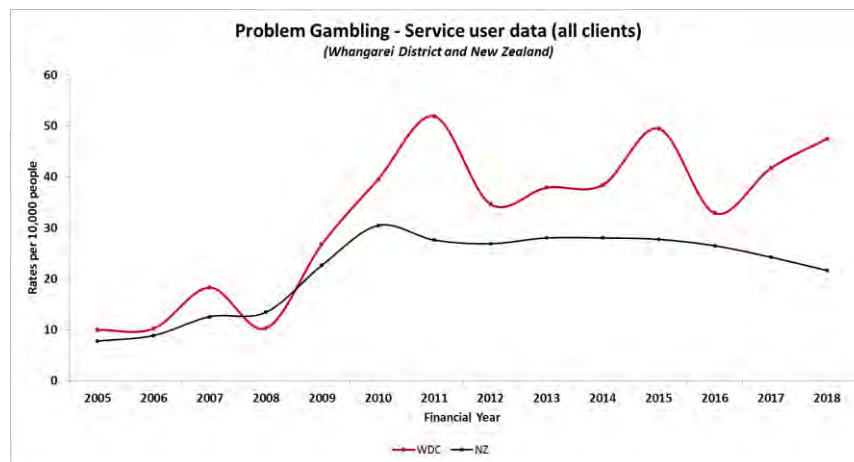
Figure 4 shows that the total number of people from Whangarei District receiving problem gambling treatment services has been steadily increasing.¹⁶

Figure 4: Problem Gambling Service Users - Whangarei District 2005 to 2018



For the year 2018, the rate (per 10,000 people) of service users for Whangarei District was much higher compared to the rates for the country (47 per 10,000 people v/s 22 per 10,000 people).¹⁶ It is interesting to note that the rates of service users for problem gambling treatment services are steadily decreasing across the country while they are increasing for Whangarei District. (Figure 5)

Figure 5: Problem Gambling Service User Data (rates) - Whangarei District and New Zealand



Research shows that only 1.6% of moderate-risk/problem gamblers seek professional help and the above numbers could be underestimates of the real burden due to problem gambling in our communities.⁷



The *Section 102 (5B)* of the Gambling Act 2003 (as at 01 September 2017) states that:

“Whenever a territorial authority is considering whether to include a relocation policy in its class 4 venue policy, it must consider the social impact of gambling in high-deprivation communities within its district.”

Considering the higher level of harm and increase in the spending on pokies, despite the reduction in the number of venues and pokies in Whangarei District, we strongly recommend the Council to amend the proposed policy to remove the relocation clause (Clause 4) in its entirety to *“prevent and minimise harm from gambling, including problem gambling.”*

CONCLUSION AND RECOMMENDATIONS:

Whangarei District is at higher risk for problem gambling due to higher levels of deprivation and Māori population. Pokie machines are proven to be the most harmful form of gambling. Although the number of venues and pokies have decreased however, the spending in the District has been steadily increasing.

Recommendations:

Whangarei District Council should:

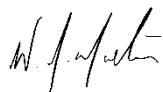
- retain its “Class 4 Gambling Venues Policy” with a ‘sinking lid’ approach and should not allow establishment of new venues or machines.
- delete the relocation clause (Clause 4 – Relocation of existing class 4 venues) in its entirety.

Thank you for the opportunity to make this submission.

Yours sincerely



José M Ortega
Medical Officer of Health



Warren Moetara
Service Manager

REFERENCES

- ¹ Dyall L. Gambling, social disorganisation and deprivation. *International Journal of Mental Health and Addiction*. 2007;5(4):320-30
- ² Fact Sheet 02: Problem Gambling. Problem Gambling Foundation of New Zealand; 2011
- ³ Ministry of Health. Problem Gambling Intervention Services in New Zealand Service User Statistics 2007. 2009. Wellington: MOH
- ⁴ Fact Sheet: Gambling in New Zealand. Problem Gambling Foundation of New Zealand; <https://www.pgfnz.org.nz/fact-sheet---gambling-in-new-zealand.html>
- ⁵ Fact Sheet 05: Social Impacts. Problem Gambling Foundation of New Zealand; 2011.
- ⁶ Ministry of Health Tatau Kahukura Māori Health Chart Book. Wellington: Ministry of Health.2006
- ⁷ 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
- ⁸ Browne M, Bellringer M, Greer N, Kolandai-Matchett K, Rawat V, Langham E, et al. Central Queensland University and Auckland University of Technology. 2017. Measuring the Burden of Gambling Harm in New Zealand. Wellington: Ministry of Health; 2017.
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- ¹⁰ Subnational ethnic population projections, by age and sex, 2013(base)-2038 update [Internet]. Statistics New Zealand. 2019 [cited 26 May 2019].
- ¹¹ Atkinson J, Salmond C, Crampton P. NZDep2013 Index of Deprivation. Wellington: Department of Public Health, University of Otago; 2014.
- ¹² APR Consultants. Social Impact Assessment - Class 4 Gambling in the Whangarei District. Whangarei.2006
- ¹³ Whangarei District Council. Class 4 Gambling Venue Policy Statement of Proposal. Whangarei: Whangarei District Council; 2019.
- ¹⁴ Department of Internal Affairs. Summary of Venues and Numbers by Territorial Authority/District, Department of Internal Affairs. 2019: Wellington.
- ¹⁵ Department of Internal Affairs, Summary of Expenditure by Territorial Authority/District, Department of Internal Affairs. 2019: Wellington.
- ¹⁶ Ministry of Health. Gambling Service User Data - Intervention client data: Clients Assisted, by Territorial Authority. Ministry of Health. Wellington. 2019



From: cms@wdc.govt.nz
Sent: 30 May 2019 00:09:58 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Bradley quin - 2019-05-30

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:
 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

I would like the number of gaming machines to increase relative to the population growth of the district. The funding which these machines provide community groups is invaluable and without this funding, many not for profit charitable organisations would not survive. Currently there is not enough funding as it is for these groups and limiting and further reducing the available funding will have a dire impact. Many of which would not survive if their funding from the likes of pub charity were to cease. I strongly support better education services in harm reduction rather than a reducing number of available machines. Reducing the availability of machines does not deter users from driving down the road to the nearest available machine. Those who are adversely affected by problem gambling will seek out a machine regardless of its location. If resources were invested in harm prevention and education services, then this would have a better outcome than si

mply limiting the availability of the machines.

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

If you have supplied a valid email address, a copy of this completed form will be emailed to you. Otherwise please print a copy of it for your own records before you close this window.

*Submit Button - This button will become active when all mandatory fields are filled in (fields marked with *) and you click once on the button.*

All submissions are considered official information under the Local Government Official Information and Meetings Act, and may be published and/or made available to elected members and the public.

From: cms@wdc.govt.nz
Sent: 27 May 2019 17:43:49 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Wende Quin - 2019-05-27

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

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Mobile Number:

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Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

line gambling, done in the privacy of ones home and 24/7. Funds generated by the machines in our community are returned back into the community so it is a win win situation.

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

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*Submit Button - This button will become active when all mandatory fields are filled in (fields marked with *) and you click once on the button.*

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From: cms@wdc.govt.nz
Sent: 23 May 2019 14:38:57 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - John Robertson - 2019-05-23

[Submitted by Anonymous User]

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* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

From: cms@wdc.govt.nz
Sent: 30 May 2019 11:37:32 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Christine Thirling - 2019-05-30

[Submitted by Anonymous User]

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Please enter your details:

* Full Name(s):

Postal Address:
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* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)



Rugby League Northland
 ASB Northland Sports House
 Western Hills Drive
 PO Box 1492, Whangarei 0140
 P: +64 9 437 9640
 F: +64 9 437 9639
 www.rln.co.nz

Class 4 Gambling Venue Policy
 Whangarei District Council
 Private Bag 9023
 WHANGAREI 0148
 To Whom It May Concern
Draft Class 4 Gambling Venue Policy



Rugby League Northland wishes to make a submission to oppose the sinking lid policy, and instead to ask Council to consider a cap on venues and machines at the current level.

If a sinking lid is maintained, it will mean that if one of the current businesses that has gaming machines can no longer operate, there would be less funds to distribute into the Whangarei community, which we consider would be detrimental to the numerous sporting clubs in the region that rely on this fundraising opportunity.

The proposed policy of a sinking lid does not appear to understand or consider that risk.

Rugby League Northland is concerned about the impact a venue closure would have without the option to relocate the machines to another establishment.

Therefore, Rugby League Northland wishes to support a cap on venues which will ensure that the current funding level of distribution to the local community is sustained. With a loss of 13 venues since the sinking lid was brought in, substantial community funding has already been lost.

We would even like to go as far as suggesting that additional venues be added in line with future population growth of the district.

Rugby League Northland is reliant on funding received from the gaming trusts to deliver into the community. As we know how important this funding is to many in the Northland sports sector, we would like to highlight this concern and ask that a mechanism to protect this funding be incorporated into the legislation.

Therefore, Rugby League Northland wishes to ask Council to consider a cap on venues and machines at the current level, without the corresponding loss of machines if a venue was to close down.

We would like to be heard in support of this submission.

Thank you for the opportunity to submit on behalf of Rugby League Northland.

Yours sincerely

Phil Marsh



Community Manager



178





*Enriching lives through play,
active recreation and sport*



SPORT
NEW ZEALAND

ASB

Chill Technology Ltd
Conbrio
Dudley & Dennis Signs
Educare
Fireco
Fullers Great Sights
Jennian Homes
More FM
NorthCloud
Pacific Motor Group
Ray White
ThermaTech
Top Energy Ltd

Dargaville Veterinary Centre
Hot Printz
JOP
Pak'nSave
Silver Fern Farms
Sutherland Security
Tailored Legal Solutions
The Northern Advocate
Whangarei Aquatic Centre

Foundation North
Oxford Sports Trust
Lion Foundation
Pub Charity
The Southern Trust
Far North District Council
Kaipara District Council
Whangarei District Council
ACC
Ministry of Social Development
Northland DHB
Northland Foundation
Northland Regional Council
Northland Secondary Schools
Water Safety NZ

23 May 2019

Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

To Whom It May Concern

Draft Class 4 Gambling Venue Policy

Sport Northland wishes to make a submission to oppose the sinking lid policy, and instead to ask Council to consider a cap on venues and machines at the current level.

If a sinking lid is maintained, it will mean that if one of the current businesses that has gaming machines can no longer operate, there would be less funds to distribute into the Whangarei community, which we consider would be detrimental to the numerous sporting clubs in the region that rely on this fundraising opportunity.

The proposed policy of a sinking lid does not appear to understand or consider that risk.

Sport Northland is concerned about the impact a venue closure would have without the option to relocate the machines to another establishment.

Therefore, Sport Northland wishes to support a cap on venues which will ensure that the current funding level of distribution to the local community is sustained. With a loss of 13 venues since the sinking lid was brought in, substantial community funding has already been lost.

We would even like to go as far as suggesting that additional venues be added in line with future population growth of the district.

Sport Northland, along with the regional sports organisations affiliated to the trust, are reliant on funding received from the gaming trusts to deliver into the community. As we know how important this funding is to many in the Northland sports sector, we would like to highlight this concern and ask that a mechanism to protect this funding be incorporated into the legislation.



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active recreation and sport*



**SPORT
NEW ZEALAND**



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Northland Foundation
Northland Regional Council
Northland Secondary Schools
Water Safety NZ

For example, Sport Northland is reliant on gaming funding to deliver water safety lessons in primary schools throughout the Northland region at no cost.

We believe this has impacted on the fact that no drownings have been recorded in the 5 – 13 age group in Northland over the past 3 years as well as a noticeable decrease in drownings in the 14 – 18 -age group.

Run/walk events are staged by Sport Northland, catering for hundreds of participants, at a greatly reduced cost thanks to gaming machine grants. No, or reduced, grants would see an increased entry fee for participants and therefore a decline in opportunities to become more active.

Therefore, Sport Northland wishes to ask Council to consider a cap on venues and machines at the current level, without the corresponding loss of machines if a venue was to close down.

We would like to be heard in support of this submission.

Thank you for the opportunity to submit on behalf of Sport Northland.

Yours sincerely

**Brent Eastwood
Chief Executive**



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): Gaye

Last name: Trimble

Postal address: PO Box 451
Whangarei 0140

Best daytime phone number: 021 465647 Mobile: 021 465647

Email: admin@squashnorthland.co.nz

I am writing this submission (✓ box) as an individual on behalf of an organisation

Organisation name: Squash Northland

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 (✓ box) Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

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or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

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Your submission will not be returned to you once it is lodged with Council. Please keep a copy for your reference.

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy below:

The funding from the revenue from pokie machines is hugely important to Squash Northland and to all amateur sporting organisations, schools, community service groups and the arts. Without this funding, we would no longer be able to operate, to deliver the programmes and services that are provided for our sport.

A massive amount of good comes from the funding from pokie sites within our district and it would be impossible to replace this funding as machine numbers drop and applications for grants increase.

For the sake of sport in Northland the sinking lid policy should be replaced with a cap on the number of machines set initially at the current machine numbers but with provision for additional machines and venues to be licensed in line with population growth.

Feel free to add additional pages if required.



Submission to the Whangarei District Council

Council's Proposed Class 4 Gambling Policy

It is my privilege to present to you this submission for and behalf of Te Hau Ora Ō Ngāpuhi who is the health arm of Te Runanga Ā Iwi Ō Ngāpuhi.

Te Hau Ora Ō Ngāpuhi has extensive grass roots community networks as well as inter-sectoral relationships with education, justice, Ministry of Health, Ministry of Social Department, Northland District Health Board, Housing and Urban Development, Oranga Tamariki and others.

Our overarching philosophy can be epitomised in it's mission statement "Kia Tū Tika Ai Te Whare Tapu Ō Ngāpuhi" "That The Sacred House of Ngāpuhi Stands Strong".

Aspirations and goals which support Te Taitokerau communities reaching out and living healthy lives are undertaken by strengthening their capabilities to reduce health inequalities thus improving the overall health status.

There is clear evidence that main form of gambling for problem gamblers are Pub or Club electronic gaming machines. There is a preference for pokie machines and Sports Betting via TAB and internet. A capping on the number of pokie machines in the region will reduce the risk of further harm to gamblers and their life style.

It is vital to understand that the most extensive form of damage to Māori are pokie machines. This simple statement need to be considered seriously by the Whanagrei District Council if they are to acknowledge and honour the agreement between the Crown and Māori in respect of the indigenous nature of Te Tiriti O Waitangi

Gambling is a modern day taniwha. Any type of gambling is an intrusion on families who can least afford this modern day taniwha. They are unfeeling, unrepentant, and feel nothing for the carnage they leave in their wake. All the while our whanau wait for someone to disempower these taniwha and their empowering grip around the throats of our future. This modern day taniwha claws away people's mana and "enslave them to forlong hopes of vast fortunes that never materialise".

The social cost to the community is huge with problem gambling contributing to poverty, deprivation, crime, domestic violence and mental illness. Problem gambling can also significantly impact on the lives of whanau who are closest to the person who is addicted to this modern day taniwha.

AUT Professor Max Abbott's research has found that the harm associated with gambling is almost double that of drug use disorders. According to Prof. Abbott the study has found six main areas of gambling harm:

- Decreased health
- Emotional or psychological distress



- Financial harm
- Reduced performance at work or education
- Relationship disruption, conflict or breakdown
- Criminal activity

There is evidence to suggest that high deprivation areas of New Zealand are targeted for a high concentration of pokie machines compared with areas of the least deprived areas. High dependency on welfare payments are areas that are targeted for the concentration of these pokie machines.

According to PGF fact sheet 01 October 2018 there are five times as many pokies in the most deprived areas of New Zealand as the least deprived.

Over 50% of pokie losses are generated by venues located in areas with the highest average deciles of deprivation.

Dr. Lance O'Sullivan said that there is a direct link between addiction to pokies and sick children. Child poverty in New Zealand can be attributed to homelessness, going without food whilst parents spend food money on gambling and other addictions.

I would like to commend the Whangarei District Council for their pragmatic and considered approach in maintaining their Sinking Lid Policy which will contribute to the health and wellbeing of Māori as well as the general population. The Council has an important role to play for Māori in minimising gambling harm through regulation of the supply of pokie machines and access to them. A Sinking Lid equates to a safer, healthier, and wealthier Northland.

I would like to speak to my submission. I can be contacted on Mobile Ph: 021-570028 or email: fred.sadler@ngapuhi.org

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fred Sadler', with a flourish at the end.

Fred Sadler
Projects coordinator Te Hau Ora O Ngāpuhi

27 May 2019

RE: Te Huinga Submission Class 4 Gambling Venue Policy

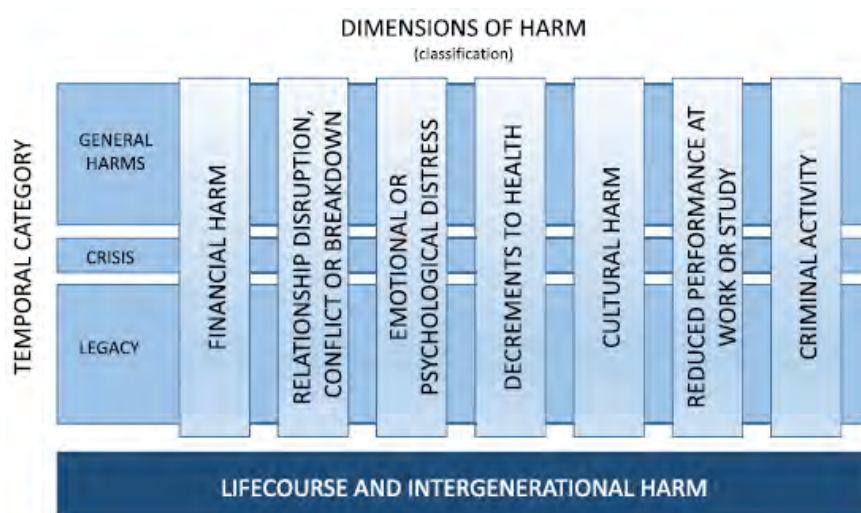
Tena koe,

My name is Huhana Lyndon, I provide this submission to Whangārei District Council on behalf of Te Huinga on the proposed changes to the Class 4 Gambling Venue Policy for the Whangārei District.

The Gambling Act 2003 defines harm as any kind of harm or distress arising from, or caused or exacerbated by, a person's gambling. This includes personal, social, or economic harm suffered by: the person, the person's spouse, civil union partner, de facto partner, family, whānau, or wider community, in the workplace, or society.

Te Huinga maintains ongoing concerns for the health and wellbeing of whānau Māori in the Whangārei rohe and the impacts that gaming machines and problem gambling can have. As hapū we recognise the benefit of a comprehensive public health model is focussed on prevention and early intervention of gambling related risk over the whole of the tangata – whānau – hāpori and hapū.

An additional concern for hapū is the unmonitored impact of online gaming (gambling) in our hapū, hāpori and wider rohe of Whangārei. While we are able to draw on figures for casino and gambling venues through the Dept of Internal Affairs – however online impacts are unable to be sourced? Anecdotally we know of online gaming harm to our whanau and our community. Has Whangārei District Council invested any resource into studying online gaming harm in the community? In the new environment with apps, and use of online sources for all manner of purchases – there is huge risk of unmonitored harm affecting our Whangārei hapū, community and residents.



Source: (Langham, Thorne, Browne, & Donaldson, 2016)

The statistics of gaming in Whangarei:

Revenue from gaming machines: Jan to March 2019 \$4,295,028.77

Numbers of machines in Whangarei: 274

Numbers of venues: 19

As such Te Huinga seek to record support for the following provisions in the Whangārei District Council Class 4 Gaming Venue Policy, as outlined below:

1. Maintenance of the “sinking lid policy” for new gaming venues
2. No consent for increases in numbers of machines
3. No consent for club venues to increase to 18 machines
4. No relocation of machines
5. Restriction on numbers of machines in the case of club merger

Te Huinga wish to present orally on this submission.

Nga mihi, na

A handwritten signature in blue ink, appearing to read 'Huhana Lyndon', is written over a light blue rectangular background.

Huhana Lyndon

Ngāti Kahu o Torongare

For Te Huinga

pikiake@gmail.com



Submission to



Proposed Gambling Venue Policy 2019

28 May 2019

Executive Summary:

The Lion Foundation is one of the most established and respected Charitable Trusts in New Zealand and has provided grants totalling almost \$1 billion to thousands of charitable projects.

This funding has enabled thousands of community organisations to deliver valuable programmes and services to their communities.

Funding provided annually to community projects from Whangarei District-based Class 4 venues is over \$6 million. During the past two years, The Lion Foundation has distributed grants totalling over \$330,000 to support local community organisations in the Whangarei District Council area.

Each one of these grants benefit a cross section of your community and region – from children, to disadvantaged and the elderly. Many projects would not have been possible without this funding support.

According to the Department of Internal Affairs website, there 274 gaming machines operating across 19 Class 4 venues within the in the Whangarei District Council area as at 31 March 2019.

Although the Lion Foundation supports a defined cap on machine numbers as an appropriate control, we do not support a “sinking lid” approach.

We recommend that the sinking lid policy be replaced with a cap of 274 gaming machines (the same number of gaming machines as operating currently) to enable up to this number to continue to operate in the future.

We believe caps needs to be set at as realistic level in order to reflect changes in population numbers and to future-proof funding levels. The Whangarei District Council population grew 3.4% from 2006 to 2013.

If the number of machines operating decreases, so potentially will the funding levels - which will ultimately deprive community organisations and projects of valuable funds. Funds generated are an invaluable source of income for community projects and **there is no obvious substitute to replace this funding should funds decrease in the future.**

Effective harm minimization processes and regulatory obligations are in place to mitigate harm.

The Lion Foundation recommends that the relocation provision be expanded as this will enable venues to move to new, modern premises, to move to buildings that have a higher earthquake rating, and to move if the current landlord is imposing unreasonable terms.

The Lion Foundation is 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.

By reducing opportunities for the community to engage in a legitimate entertainment option, the risk is that some people will simply turn to online gambling – which is unsupervised and there is no legal requirement to return any funds to the community.

Objective

The objective of this submission is to provide feedback in response to the Whangarei District Councils' Gambling Venue Policy review.

Background

The Lion Foundation is one of the most established and respected Charitable Trusts in New Zealand. Since it was established over 30 years ago, it has provided community grants totalling almost \$1 billion to thousands of charitable projects throughout New Zealand.

Without this funding many community organisations would be unable to deliver valuable programmes and services to their communities.

We believe it is important that decision makers are appropriately informed on the negative impact that any proposed changes are likely to have on community groups and organisations.

According to the Department of Internal Affairs website there are 274 gaming machines operating across 19 Class 4 venues within the Whangarei District Council area as at 31 March 2019.

However, since 2003, the number of venues in the Whangarei District has decreased from 35 to 19 and gaming machines numbers have dropped from 373 to 274 – a decrease of almost 30% less machines over this period.

Today, these numbers represent 36 machines per 10,000 people in the Whangarei District. Having fewer than 75 machines per 10,000 people is considered to be low risk.

Funding provided annually to community projects from Whangarei District-based Class 4 venues is over \$6 million. During the past two years, The Lion Foundation has provided grants totalling over \$330,000 from funds generated within the District to support local projects and community organisations.

These grants vary in size from a few hundred dollars to several thousand dollars.

Each and every one of these makes a positive contribution to life in your community by helping organisations deliver programmes and services – which in turn benefits a wide cross section of people - from children, to disadvantaged and the elderly.

The Lion Foundation grants over the past two years included the following recipients:

Blue Goose Papermill Charitable Trust	\$7,286.00
Blue Light Ventures Inc - Whangarei	\$20,000.00
Brain Injury Assn Northland Inc	\$2,000.00
Cancer Soc of N Z Auckland Northland Division Inc	\$25,000.00
CCS Disability Action Northland Inc	\$10,400.00
City Cricket Club Inc	\$16,980.00
Deaf Aotearoa Holdings Ltd - Northland Branch	\$4,254.00
Dress for Success Northland	\$20,000.00
Glenbervie School	\$10,000.00

Habitat for Humanity (Northland) Ltd	\$16,654.00
Kamo Bowling Club Inc	\$4,313.00
Kamo Community Inc	\$25,000.00
Kamo High School	\$4,226.00
Kamo Intermediate School	\$1,700.00
Kamo Primary School	\$8,456.00
Kawakawa Baptist Church	\$15,721.00
Literacy Whangarei	\$5,000.00
Matarau School	\$1,534.00
Northland Badminton Assn Inc	\$4,212.00
Northland Golf Club Inc	\$13,300.00
Northland Junior Cricket Inc	\$5,000.00
Northland Multiple Sclerosis Soc Inc	\$211.00
Northland Paraplegic & Physically Disabled Assn	\$7,042.00
Northland Rugby Union Inc	\$12,000.00
Northland Vintage Machinery Club (Whangarei) Inc	\$5,000.00
Onerahi Central Cricket Club Inc	\$3,000.00
Parent to Parent N Z - Northland	\$2,250.00
Regent Community Trust	\$3,000.00
Sport Northland	\$10,000.00
Storylines Childrens Literature Charitable Trust of N Z	\$1,880.00
Te Kura o Otangarei	\$10,000.00
Tikipunga Assn Football Club Inc	\$4,830.00
Tikipunga High School	\$2,400.00
Whananaki School	\$5,000.00
Whangarei Academy of Gymnastics Inc	\$3,716.00
Whangarei Boys High School	\$10,000.00
Whangarei Budgeting Service	\$10,000.00
Whangarei Golf Club Inc	\$10,000.00
Whangarei Group Riding for the Disabled Inc	\$5,000.00
Whangarei Harmony Chorus Inc	\$1,500.00
Whangarei Migrant Centre Inc	\$770.00
Whangarei Repertory Soc Inc	\$1,842.00
Whau Valley School	\$2,876.00

Many community projects would not have been possible without this funding support.

Funding Breakdown

How funds are generated and how they are used is often misunderstood. Locally generated funds go to supporting local organisations and projects.

In terms of the funds generated, every Society is required to return:

- 40% minimum of its gross proceeds to the community
- 35% to central government through GST & duty
- 16% to the local venue operator
- Up to 2% as a problem gambling levy
- 5-6% as Opex and Capex to maintain machines and manage the grants programme.

The Lion Foundation has Regional Grants Committees who have excellent knowledge and understanding of local community needs.

SUBMISSION: Proposed Gambling Venue Policy

1. Machine Numbers:

It is proposed that no new gaming machines or venues be allowed in the District, meaning that the number of machines will continue to reduce over time.

The Lion Foundation supports a defined cap on machine numbers as an appropriate control but does not support this “sinking lid” approach.

We recommend that the sinking lid policy be replaced with a cap of 274 gaming machines (the same number of gaming machines as operating currently) to enable up to this number to continue to operate in the future.

This rationale for this recommendation includes:

- A cap on machine numbers is an appropriate control which is exactly the purpose of the Act. However, we believe this cap needs to be set at as realistic level in order to reflect changes in population numbers and to future-proof funding levels. The Whangarei District Council usual resident population grew from 74,463 in 2006 to 76,995 people in 2013 – an increase of 3.4% during this period (*2006 and 2013 Census figures*).
- A “sinking lid” limits the capacity to provide increased funds to the community as the population grows into the future. If the number of machines operating decreases, so potentially will funding levels - which will ultimately deprive community organisations and projects of valuable funds.
- Funds generated are an invaluable source of income for community projects and **there is no obvious substitute to replace this funding should funds decrease in the future.** Subsequently, community groups will suffer and will find it extremely difficult to maintain their level of services.
- There are 36 machines per 10,000 people in the Whangarei District. Having fewer than 75 machines per 10,000 people is considered to be low risk. For context, a medium risk score suggests a District is best suited to a policy that restricts locations and numbers of gaming machines but may not need to go as far as having a sinking lid.

- A sinking lid policy assumes that less machines = less problem gambling. Evidence would suggest that a reduction in venues or machines does not result in a sustainable reduction in problem gambling¹.
- In contrast to online gambling, machines at venues allow gaming in a supervised environment with staff trained to identify those who may show signs of problem gambling. Playing at a venue means those players with potential problems can be identified, monitored and/or offered support.
- Effective harm minimization processes and regulatory obligations are in place to mitigate harm. This now includes facial recognition detection which prevent problem gamblers from having access to machines. Additionally, there is also tailored harm minimisation training for venue staff including how to identify a potential problem gambler and what steps to take when someone is identified.
- Software is installed on all gaming machines that advises players how long they have been playing a machine, how much they have spent, and whether they wish to continue playing. This is known as PID (Player Information Display) and pops up on the screen automatically every 30 minutes.
- Regular 'Room sweeps' from venue personnel to check on players and address any player behaviour concerns.

2. Relocation of Class 4 Gambling Venues

The Lion Foundation recommends that the relocation provision be expanded as this will:

- Enable venues to re-establish after a natural disaster, flood, or fire.
- Enable venues to move out of earthquake-prone buildings.
- Enable venues to move to new refurbished premises.
- Create fairness in cases of public works acquisition or lease termination.
- Prevent landlords demanding unreasonable rentals.

An expanded relocation policy still allows Councils to use their discretion on a case by case basis. Councils can still refuse a relocation where it does not feel a relocation is suitable. We believe that Council should retain this discretion.

Losing the ability to permit suitable locations may even perpetuate (rather than lessen) the very risk of gambling harm the Council is trying to mitigate. It doesn't allow the Council to consider suitability of that location, safety issues, compliance record, harm minimisation initiatives or changing community profiles. Council may also end up a 'passive observer' when there may be a more suitable location (away from community facilities, away from high deprivation areas etc) but the Council is unable to approve the better location.

¹ *National Gambling Study, MOH, 2012-2015.*

Summary

By reducing opportunities for the community to engage in a legitimate entertainment option, the risk is that some people will simply turn to online gambling – which is unsupervised and there is no legal requirement to return any funds to the community.

We therefore recommend:

- **The sinking lid policy be replaced with a cap of 274 gaming machines (the same number of gaming machines as operating currently) to enable up to this number to continue to operate in the future.**
- **The relocation provision is expanded to enable venues to move to new, modern premises, to move to buildings that have a higher earthquake rating, and to move if the current landlord is imposing unreasonable terms.**

These recommendations will:

- Control the growth of gambling as intended by the policy
- Allow Council control to encourage/allow venues to be situated in the right places while still controlling the growth of gambling
- Enable funding levels to the community to be maintained into the future – which is important in a growing population.

The Lion Foundation is 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.

**Murray Reade
Chief Executive
The Lion Foundation
Private Bag 106605
Auckland 1143**

Telephone: 027 565 3677

Email: murray.reamde@lionfoundation.org.nz



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): Suzanne Elizabeth

Last name: Hay

Postal address: PO Box 1747,
Whangarei 0140

Best daytime phone number: 09 430 7500 Mobile: 027 635 2822

Email: sue.hay@salvationarmy.org.nz

I am writing this submission (✓ box) as an individual on behalf of an organisation

Organisation name: The Salvation Army Northland Regional Bridge (addiction service)

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

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1:00pm – 3:00pm Tuesday 11 June 2019 (✓ box) Yes No

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Please tell us your thoughts on the draft Class 4 Gambling Venue Policy below:

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

The Salvation Army is particularly concerned with non-casino gaming machines (NCGMs), as this mode of gambling is responsible for the majority of the harm observed in New Zealand. The gambling industry itself acknowledges that NCGMs are 389 times more likely to induce harm than lottery products. NCGMs are also the most highly accessible mode of gambling in New Zealand aside from online gambling, with currently 20 class 4 gambling venues in the District. The literature advocates for a number of practices to minimise and prevent problem gambling - one of the best-supported strategies involves limiting access to gaming machines.

The long-term trend of declining participation in gambling activities, including NCGM gambling, is likely to gradually reduce the availability of gambling-derived community funds with or without further regulatory intervention. The Salvation Army maintains that the Class 4 funding model is neither sustainable in the long term, nor favourable in the short term for New Zealand communities. Only about 42% of GST-inclusive NCGM revenue ever reaches grant recipients, and a high proportion leaves the regions as central government taxes and society/venue costs. Some of the charitable causes funded through Class 4 gambling are essential public goods and services. However, because a large proportion of gambling revenue is derived from those with the least disposable income, the Class 4 funding model has been criticised as being analogous to regressive taxation. Public opinion reflects such concerns – since 1985, the proportion of New Zealanders who are opposed to or uncertain about the use of gambling revenue to fund charitable causes has risen steadily. The Salvation Army believes that councils have an important role to play in incentivising communities to seek less harmful ways to fund necessary services.

Gambling harm remains a stigmatised and neglected public health issue, yet the impact gambling-related harm has on crime, poverty, employment, productivity, family functioning, individual and community wellbeing is significant. Through this policy review, the District Council has an opportunity to make influential decisions that will reduce harm and benefit our communities both now and in the future. We urge the council members, as leaders in our community, to continue with the current sinking lid policy that is focused on preventing and minimising harms of gambling. Doing so will demonstrate that council leadership places value on community wellbeing, and is doing everything possible to support healthy communities.

In summary: The Salvation Army supports a sinking lid policy, and a restriction on the number of Class 4 machines which may be operated at any one venue.

Feel free to add additional pages if required.

From: cms@wdc.govt.nz
Sent: 30 May 2019 10:27:35 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Tikipunga AFC - 2019-05-30

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:

 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission? Yes

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

On current Whangarei District Council policy

i)

The 'sinking lid' policy in place for the last fifteen years has undoubtedly allowed the District Council to effectively 'control the growth of class IV gambling' and 'minimise the harm caused by class IV gambling'.

ii) In the last fifteen years, there has been a reduction of 13 venues across the District.

On Class IV Gaming Licences

i)

Under the Gambling Act 2003, class IV gaming venues are required to return a minimum 40% of net proceeds to a range of non-profit entities such as schools, amateur sports organisations, community service groups and the arts via charitable trusts

ii)

A further reduction of class IV gaming licences in the Whangarei District would risk transferring funds from organisations that benefit the community in a broad number of sectors

A shift from the 'sinking lid' approach toward a cap on class IV licences based on factors such as population would allow Whangarei District Council to continue its control over the growth of class IV gambling and minimize the harm it causes without potentially depriving non-profit community organisations within the Whangarei District a source of funding that they rely on to operate.

Thank you for taking the time to read this submission.

Yours Sincerely,

Don McDonald-Spice

Club manager

Tikipunga AFC

(This box will automatically expand)



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): Marnie

Last name: Reid

Postal address: 417 Three Mile Bush Road, RD1,
Kamo, Whangarei 0185

Best daytime phone number: _____ Mobile: 0210642444

Email: marnie@bluelight.co.nz

I am writing this submission (✓ box) as an individual on behalf of an organisation

Organisation name: Whangarei Blue Light Ventures Inc

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm – 3:00pm Tuesday 11 June 2019 (✓ box) Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

Be sure to get your written comments to us by **5.00pm on Friday 31 May**. Follow the instructions and provide your comments on the next page.

How to register and/or get this form to us

IN PERSON:

By visiting Customer Service desks at either: Forum North, Rust Ave, Whangarei, or Ruakaka Service Centre, Takutai Place, Ruakaka

or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
Whangarei District Council
Private Bag 9023
WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
or email us: mailroom@wdc.govt.nz

Points to remember when making a submission

Please print clearly. The form should be easy to read and be understood, and may need to be photocopied.

We will respond in writing to every submission received. Please ensure that you provide appropriate contact details for this. Emails are our preferred form of communication.

All submissions are considered public under the Local Government Official Information and Meetings Act 1987, and may be published and made available to elected members and the public.

Your submission will not be returned to you once it is lodged with Council. Please keep a copy for your reference.

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy below:

Whangarei Blue Light Ventures Inc operates as a registered branch of Blue Light Ventures Inc working in partnership with the police to deliver an extensive range of youth programmes and activities.

Our vision is for every young person in Aotearoa to reach their full potential.

Our mission to empower youth to be better New Zealanders through quality experiences. Local Whangarei programmes include Blue Light CrossFit in the Otangarei community, and our Matuku Moana Waka Ama programme for at-risk girls. We send several youth each year on camps (Life Skills and Leadership), Spirit of NZ voyages and activities, all with the aim of empowering youth.

Whangarei Blue Light Ventures Inc relies heavily on funding streams sourced through local pokere sites. A reduction of funding from these venues by any means will make it difficult for Whangarei Blue Light Ventures Inc to maintain its current momentum and positive impact on our Whangarei community.

I ask that you please take this into consideration as you undertake the three-yearly review of the Class 4 Gambling (pokres) policy.

Thank you.

Feel free to add additional pages if required.

M Reid

Marnie Reid
Blue Light Coordinator
Whangarei Blue Light Ventures Inc
marnie@bluelight.co.nz

From: cms@wdc.govt.nz
Sent: 23 May 2019 20:42:38 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - L W Roberts,secretary bowls whangarei - 2019-05-23

[Submitted by Anonymous User]

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Please enter your details:

* Full Name(s):

Postal Address:

(This box will automatically expand)

* Best Daytime Phone Number:

(If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:

(If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:

(Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once you click the [Submit Form] button the form cannot be changed.

From: cms@wdc.govt.nz
Sent: 27 May 2019 13:37:31 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Sara Watson - 2019-05-27

[Submitted by Anonymous User]

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Please enter your details:

* Full Name(s):

Postal Address:
 (This box will automatically expand)

* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

Please check that the details you have provided are correct before you submit the form – once

From: cms@wdc.govt.nz
Sent: 31 May 2019 09:40:50 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Paul Cleary
- 2019-05-31

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:
(This box will automatically expand)

* Best Daytime Phone Number:
(If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
(If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
(Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

Draft Class 4 Gambling Venue Policy

The Whangarei Netball Centre wishes to make a submission to oppose the sinking lid policy, and instead to ask Council to consider a cap on venues and machines at the current level.

If a sinking lid is maintained, it will mean that if one of the current businesses that has gaming machines can no longer operate, there would be less funds to distribute into the Whangarei community, which we consider would be detrimental to the numerous sporting clubs and organisations including our community Netball Centre.

The Whangarei Netball Centre wishes to support a cap on venues which will ensure that the current funding level of distribution to the local community is sustained. With a loss of 13 venues since the sinking lid was brought in, substantial community funding has already been lost. We would even like to go as far as suggesting that additional venues be added in line with future population growth of the district.

The Whangarei Netball Centre is reliant on funding received from the gaming trusts to deliver netball to the community. If we were to lose funding this would be detrimental in what we could offer to the Whangarei community. We would be unable to provide to the same degree our netball competition, leadership programmes, representative programme and facilities utilized by various groups.

Therefore, WNC wishes to ask Council to consider a cap on venues and machines at the current level, without the corresponding loss of machines if a venue was to close down.

Thank you for the opportunity to submit on behalf of the Whangarei Netball community of 2500 members.

Kind Regards

Whangarei Netball Centre

(This box will automatically expand)



Submission form

Class 4 Gambling Venue Policy amendments

Thank you for taking this opportunity to comment, we welcome your feedback.

Please enter your details below

First name(s): Megan
 Last name: Turner
 Postal address: PO Box 937
Whangarei
 Best daytime phone number: _____ Mobile: 021 2896800
 Email: manager@whangarei-squash.co.nz
 I am writing this submission (✓ box) as an individual on behalf of an organisation
 Organisation name: Whangarei Tennis & Squash Club Inc.

Tell us in person

If you are providing a written submission, you can also attend our Hearing to tell us about your thoughts in person.

Alternatively, you don't have to write a submission to provide us with your feedback. You can use this form to register to attend the Hearing and just tell us your thoughts in person.

Please register for the Hearing if you are interested in talking to Council in person:

1:00pm - 3:00pm Tuesday 11 June 2019 (✓ box) Yes No

The Hearing will be held in Council Chambers.

Please get your submission and/or your hearing registration to us by 5pm Friday 31 May.

Tell us in writing

Be sure to get your written comments to us by **5.00pm on Friday 31 May**. Follow the instructions and provide your comments on the next page.

How to register and/or get this form to us

IN PERSON:

By visiting Customer Service desks at either: Forum North, Rust Ave, Whangarei, or Ruakaka Service Centre, Takutai Place, Ruakaka

or

by phoning 09 430 4200 or 0800 932 463 and one of our friendly Customer Service staff will fill out this form for you over the phone

BY MAIL:

Class 4 Gambling Venue Policy
 Whangarei District Council
 Private Bag 9023
 WHANGAREI 0148

or fax to 09 438 7632

ONLINE/EMAIL

Complete this for online: www.wdc.govt.nz
 or email us: mailroom@wdc.govt.nz

30th May 2019

Re: Submission in Relation to Whangarei District Council's Proposed Class IV Gambling Policy

To whoever it may concern,

In light of the Council's review of its Class IV Gambling Policy, we wish to submit the following for your consideration as we believe they have direct or indirect implications for Whangarei Tennis and Squash Club Inc. and other non-profit entities in the Whangarei District-

On current Whangarei District Council policy

- i) The 'sinking lid' policy in place for the last fifteen years has undoubtedly allowed the District Council to effectively 'control the growth of class IV gambling' and 'minimise the harm caused by class IV gambling'.
- ii) In the last fifteen years, there has been a reduction of 13 venues across the District.

On Class IV Gaming Licences

- i) Under the Gambling Act 2003, class IV gaming venues are required to return a minimum 40% of net proceeds to a range of non-profit entities such as schools, amateur sports organisations, community service groups and the arts via charitable trusts
- ii) A further reduction of class IV gaming licences in the Whangarei District would risk transferring funds from organisations that benefit the community in a broad number of sectors

A shift from the 'sinking lid' approach toward a cap on class IV licences based on factors such as population would allow Whangarei District Council to continue its control over the growth of class IV gambling and minimize the harm it causes without potentially depriving non-profit community organisations within the Whangarei District a source of funding that they rely on to operate.

Thank you for taking the time to read this submission.

Yours Sincerely,



Megan Turner
Club Manager
0212896800

From: cms@wdc.govt.nz
Sent: 28 May 2019 12:20:56 +1200
To: Mail Room
Subject: Submission Form: Class 4 Gambling Venue Policy Amendments - Sophia Xiao-Colley - 2019-05-28

[Submitted by Anonymous User]

Do not reply to this email - This mailbox is not monitored. This is a copy of information submitted for your records.

Please enter your details:

* Full Name(s):

Postal Address:

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* Best Daytime Phone Number:
 (If you do not have a daytime telephone number, please type N/A in the above box).

Mobile Number:

Email:
 (If you provide a valid email address, a copy of this form will be sent to you).

Name of Organisation:
 (Please provide an organisation name only if you are making this submission on behalf of that organisation).

Please select whether or not you are interested in talking to Council, in person, at a hearing to be held 1:00pm - 3:00pm Tuesday 11 June 2019.

* Do you wish to be heard in support of your submission?

Your Submission:

Please tell us your thoughts on the draft Class 4 Gambling Venue Policy:

(This box will automatically expand)

RESOLUTION TO EXCLUDE THE PUBLIC

That the public be excluded from the following parts of proceedings of this meeting.

The general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and the specific grounds under Section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

1.	The making available of information would be likely to unreasonably prejudice the commercial position of persons who are the subject of the information. {Section 7(2)(c)}
2.	To enable the council (the committee) to carry on without prejudice or disadvantage commercial negotiations. {(Section 7(2)(i))}.
3.	To protect the privacy of natural persons. {Section 7(2)(a)}.
4.	Publicity prior to successful prosecution of the individuals named would be contrary to the laws of natural justice and may constitute contempt of court. {Section 48(1)(b)}.
5.	To protect information which is the subject to an obligation of confidence, the publication of such information would be likely to prejudice the supply of information from the same source and it is in the public interest that such information should continue to be supplied. {Section7(2)(c)(i)}.
6.	In order to maintain legal professional privilege. {Section 2(g)}.
7.	To enable the council to carry on without prejudice or disadvantage, negotiations {Section 7(2)(i)}.

Resolution to allow members of the public to remain

If the council/committee wishes members of the public to remain during discussion of confidential items the following additional recommendation will need to be passed:

Move/Second

"That _____ be permitted to remain at this meeting, after the public has been excluded, because of his/her/their knowledge of Item _____.

This knowledge, which will be of assistance in relation to the matter to be discussed, is relevant to that matter because _____.

Note:

Every resolution to exclude the public shall be put at a time when the meeting is open to the public.