



24 June 2016

Draft Wairarapa Gambling Venue Policy and Draft Wairarapa TAB Board Venue Policy
Masterton District Council
PO Box 444
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Dear Sir/Madam

Re: Draft Wairarapa TAB Board Venue Policy 2016

Submitter: Dr Jill McKenzie, Medical Officer of Health
on behalf of Regional Public Health

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Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Wairarapa, Hutt Valley and Capital & Coast and is a service of the Hutt Valley District Health Board.

We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

Reason for submitting

“The Gambling Act 2003 has defined problem gambling as a public health issue in New Zealand, and the Ministry of Health is now responsible for preventing and minimising gambling-related harm. Part of the general public health approach is to encourage healthy, supportive environments.”¹

¹ Raising the odds, Ministry of Health 2008; Access or adaptation? Storer, Abbott and Stubbs, 2009

Health inequalities often occur when the negative impacts of problem gambling fall disproportionately on low socio-economic groups. It not only affects the individual involved but can also impact on 5-10 people among whānau, friends and wider community of the gambler.² Problem gambling particularly affects the poor, ethnic minorities, youth, the aged and other vulnerable groups.

Apart from financial loss, gambling's insidious nature can lead to a number of life-long personal, social, and legal problems.

While external agencies such as the Gambling Helpline for problem gambling can offer help, changes in upstream determinants are critical to this important societal issue.

Comments and recommendations

Amongst its objectives the draft policy aims to minimise the harm caused by TAB Board Venues and to have regard to the social impacts of gambling in the Wairarapa region. However, the draft policy then remains silent to the means by which it intends to achieve these objectives.

Sec 65 (D) of the Racing Act 2003 allows Territorial Authorities to determine in their policy whether Board Venues may be established in their territorial districts and where they may be located. The Territorial Authority may choose to consider any areas of concern including the characteristics of the district or parts of a district and the location of kindergartens, early childhood centres, schools, places of worship and other community facilities.

The draft policy does not specify these matters and Regional Public Health recommends that a new clause be inserted requiring that no new TAB venue be permitted where it is incompatible with that part of the district for which it is proposed.

Sec 65 (D) of the Racing Act 2003 further allows Territorial Authorities to have regard to the cumulative effects of additional opportunities for gambling in the district. Again the policy is silent on cumulative effects of additional opportunities for gambling in the district although the Draft Gambling Venue policy states that no limit will be imposed on the number of stand alone TAB venues. Such a statement would suggest that the cumulative effects of additional opportunities for gambling in the district are not adequately addressed in the draft policy.

Regional Public Health recommends that a new objective be added to ensure that Councils give effect to the need to consider the cumulative adverse effects of additional opportunities for gambling in the Wairarapa district.

Regional Public Health notes that the stated objective 1.4 of the draft policy is:

“To adhere to the Act’s purpose namely:

- to provide effective governance arrangements for the racing industry;

² Gambling in New Zealand Fact Sheet 01, Feb 2012. Problem Gambling Foundation of New Zealand Retrieved 28 August 2012 from <http://pgfnz.org.nz/Uploads/Library/00Collection.pdf>

- to facilitate betting on galloping, harness, greyhound races, and other sporting events, and
- to promote the long-term viability of New Zealand racing.”

These are the objectives of the New Zealand Racing Board and not of the Territorial Authority.

Regional Public Health recommends that clause 1.4 be deleted as these are not the objectives of Territorial Authorities and do not align with objectives 1.1, 1.2 and 1.3 of the Policy, which focus on minimising harm from gambling for the community.

Summary of recommendations

Regional Public Health recommends that:

- A new clause be inserted stating “No new TAB will be permitted where the Councils believe that the character of the district, or part of the district for which the venue is proposed will be adversely affected, or where there is likely to be an adverse effect on any kindergartens, early childhood centres, schools, places of worship or other community facilities”.
- That clause 1.4 of the draft policy be deleted and replaced by a new clause 1.4 which states “To have regard to the cumulative effects of additional opportunities for gambling in the district.”

Thank you for the opportunity to provide a written submission on the Draft TAB Board Venue Policy 2016. The submitter **does** wish to have the opportunity to speak to this submission.

Yours sincerely

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Regional Public Health

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Regional Public Health