



24 June 2016

Draft Wairarapa Gambling Venue Policy and Draft Wairarapa TAB Board Venue Policy
Masterton District Council
PO Box 444
Masterton 5840
mdc@mstn.govt.nz

Dear Sir/Madam

Re: Draft Wairarapa Gambling Venue Policy 2016
Submitter: Dr Jill McKenzie, Medical Officer of Health
on behalf of Regional Public Health
Contact Details: Regional Public Health
Hutt Valley District Health Board
Private Bag 31-907
Lower Hutt
Telephone: (04) 5709002 Fax: (04) 570 9211

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

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

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

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.

Regional Public Health welcomes and is supportive of the Draft Gambling Venue Policy to control the growth of gambling in the Wairarapa and to minimise the harm caused by gambling through the use of gaming machines. 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.

To this end we note the success of the previous policy in reducing the number of class 4 venues and the subsequent reduction in gaming machine numbers, and we congratulate Councils; on the provision and administration of the policy.

Regional Public Health supports the draft policy's stated intent that if a class 4 venue ceases to operate gaming machines, no new venue can take its place (unless subject to specific provisions).

Comments and recommendations

Regional Public Health is unsure of the intent of the class 4 venues policy in relation to stand alone TAB venues. Clause 3.1 (b)(i) reads "the gambling venue operator at the new site shall be the same venue operator at the site to be vacated".

Regional Public Health understands by reference to 3.1 (c) that this policy may not be intended to apply to stand alone TAB venues with gaming machines. Regional Public Health seeks clarification that clause 3.1 (c) is subject to the provisions of 3.1(a) and (b) and 4.3.

As written this would allow TAB venues to open new class 4 gaming venues without previous ownership of gaming machines. This does not support the objectives of this policy.

Regional Public Health recommends that any decision to allow a stand alone TAB to be an alternative class 4 venue, shall be made in conjunction with the provisions of clause 3.2, i.e. to have regard to the social impacts of gambling.

Clause 2.4 states that no limit will be imposed on the number of stand alone TAB venues. Regional Public Health is unsure of the intention of this clause within the context of the Draft Gambling Venue Policy and suggests that it sits better within the text of the Wairarapa TAB Board Venue Policy.

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>

Summary of recommendations

Regional Public Health recommends that:

- Clause 3.1(c) be rewritten to clarify that clause 3.1 (b) apply in the case of the re-establishment of a class four venue in exceptional circumstances to a stand alone TAB.
- Clause 2.4 be deleted and inserted in the Draft Wairarapa TAB Board Venue Policy.

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

Yours sincerely

Dr Jill McKenzie
Medical Officer of Health
Regional Public Health

Peter Gush
Service Manager
Regional Public Health