



**PAPAIOEA**  
PALMERSTON  
NORTH  
CITY

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# **PALMERSTON NORTH CITY COUNCIL**

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AGENDA

## **COMMUNITY COMMITTEE**

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**9AM, WEDNESDAY 9 AUGUST 2023**

COUNCIL CHAMBER, FIRST FLOOR  
CIVIC ADMINISTRATION BUILDING  
32 THE SQUARE, PALMERSTON NORTH

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# MEMBERS

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**Lorna Johnson (Chair)**  
**Patrick Handcock (Deputy Chair)**  
**Grant Smith (The Mayor)**

**Brent Barrett**  
**Rachel Bowen**  
**Lew Findlay (QSM)**  
**Billy Meehan**

**Orphée Mickalad**  
**Karen Naylor**  
**William Wood**  
**Kaydee Zabelin**

AGENDA ITEMS, IF NOT ATTACHED, CAN BE VIEWED AT

[pncc.govt.nz](http://pncc.govt.nz) | Civic Administration Building, 32 The Square  
City Library | Ashhurst Community Library | Linton Library

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**Waid Crockett**

**Chief Executive | PALMERSTON NORTH CITY COUNCIL**

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Te Marae o Hine | 32 The Square  
Private Bag 11034 | Palmerston North 4442 | New Zealand  
[pncc.govt.nz](http://pncc.govt.nz)

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# COMMUNITY COMMITTEE MEETING

9 August 2023

## ORDER OF BUSINESS

**1. Karakia Timatanga**

**2. Apologies**

**3. Notification of Additional Items**

Pursuant to Sections 46A(7) and 46A(7A) of the Local Government Official Information and Meetings Act 1987, to receive the Chairperson's explanation that specified item(s), which do not appear on the Agenda of this meeting and/or the meeting to be held with the public excluded, will be discussed.

Any additions in accordance with Section 46A(7) must be approved by resolution with an explanation as to why they cannot be delayed until a future meeting.

Any additions in accordance with Section 46A(7A) may be received or referred to a subsequent meeting for further discussion. No resolution, decision or recommendation can be made in respect of a minor item.

**4. Declarations of Interest (if any)**

Members are reminded of their duty to give a general notice of any interest of items to be considered on this agenda and the need to declare these interests.

**5. Public Comment**

To receive comments from members of the public on matters specified on this Agenda or, if time permits, on other Committee matters.

(NOTE: If the Committee wishes to consider or discuss any issue raised that is not specified on the Agenda, other than to receive the comment made or refer it to the Chief Executive, then a resolution will need to be made.)

**6. Confirmation of Minutes**

Page 7

"That the minutes of the Community Committee meeting of 24 May 2023 Part I Public be confirmed as a true and correct record."

**7. Hearing of Submissions: Draft Gambling Venue Policies 2023**

Page 15

**8. Summary of Submissions: Draft Gambling Venue Policies**

Page 225

Memorandum, presented by Stacey Solomon, Policy Analyst.

**9. Impact of changes to SuperGold Card and Community Services Card free parking rules**

Page 237

Memorandum, presented by Hamish Featonby, Group Manager - Transport & Development and James Miguel, Senior Transport Planner.

**10. Review of Companion Card Scheme Trial**

Page 243

Report, presented by Ahmed Obaid, Community Development Advisor and Stephanie Velvin, Community Development Manager.

**11. Papaioea Place Redevelopment Six-Monthly Update**

Page 253

Memorandum, presented by Bryce Hosking, Group Manager - Property and Resource Recovery.

**12. Committee Work Schedule - August 2023**

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**13. Karakia Whakamutunga**

## 14. Exclusion of Public

To be moved:

"That the public be excluded from the following parts of the proceedings of this meeting listed in the table below.

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:

General subject of each matter to be considered	Reason for passing this resolution in relation to each matter	Ground(s) under Section 48(1) for passing this resolution

This resolution is made in reliance on Section 48(1)(a) of the Local Government Official Information and Meetings Act 1987 and the particular interest or interests protected by Section 6 or Section 7 of that Act which would be prejudiced by the holding of the whole or the relevant part of the proceedings of the meeting in public as stated in the above table.

Also that the persons listed below be permitted to remain after the public has been excluded for the reasons stated.

*[Add Third Parties]*, because of their knowledge and ability to assist the meeting in speaking to their report/s [or other matters as specified] and answering questions, noting that such person/s will be present at the meeting only for the items that relate to their respective report/s [or matters as specified].



## PALMERSTON NORTH CITY COUNCIL

### **Minutes of the Community Committee Meeting Part I Public, held in the Council Chamber, First Floor, Civic Administration Building, 32 The Square, Palmerston North on 24 May 2023, commencing at 9.00am.**

**Members Present:** Councillors Lorna Johnson (in the Chair), Patrick Handcock, Brent Barrett, Rachel Bowen, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood and Kaydee Zabelin.

**Non Members:** Deputy Mayor Debi Marshall-Lobb and Councillor Leonie Hapeta.

**Apologies:** The Mayor Grant Smith

Councillor Leonie Hapeta was not present when the meeting resumed at 11.12am. She entered the meeting again at 11.15am during consideration of clause 18. She was not present for clause 17.

Councillor Rachel Bowen was not present when the meeting resumed at 11.12am. She entered the meeting again at 11.31am during consideration of clause 19. She was not present for clause 17 and 18 inclusive.

Councillor Billy Meehan left the meeting at 11.38am during consideration of clause 19. He entered the meeting again at 11.57am during the consideration of clause 21. He was not present for clauses 19 to 20 inclusive.

#### **Karakia Timatanga**

Councillor Lorna Johnson opened the meeting with karakia.

#### **12-23 Apologies**

Moved Lorna Johnson, seconded Patrick Handcock.

#### **The COMMITTEE RESOLVED**

1. That the Committee receive the apologies.

Clause 12-23 above was carried 12 votes to 0, the voting being as follows:

#### **For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.

### **Declarations of Interest**

Councillor Lew Findlay declared a conflict of interest in Item 6: Presentation – Grey Power Manawatū (clause 15) and took no further part in discussion or debate after question time.

Councillor Patrick Handcock declared an interest in Item 11: Development Subsidy request from the Methodist Church of New Zealand Te Haahi Weteriana o Aotearoa Manawatū Rangitīkei Methodist Parish (clause 19) and took no further part in discussion or debate.

## **13-23**

### **Public Comment**

#### **Russell and Ros Hallam**

Russell and Ros Hallam, members of the Palmerston North Seniors Reference Group and Age Friendly Palmerston North, spoke in support of extending the concession to give free parking to Gold Card holders in the city centre from 9.00am to 3.00pm Monday to Friday inclusive. As it would encourage older people to participate in activities in the city centre outside of the current concession times and without distraction of time constraints.

They also spoke in support of Palmerston North becoming an Age Friendly city, to promote social and healthy activities for the older sector of the community.

#### **Nigel Fitzpatrick, Sports Manawatū**

Nigel Fitzpatrick made the following comments in support of Palmerston North obtaining Age Friendly status:

- Sports Manawatū has a vision of seeing everyone active, this encompasses helping older people being active.
- Need Council mandate to support this.

Moved Lorna Johnson, seconded Patrick Handcock.

### **The COMMITTEE RESOLVED**

1. The Committee resolved that the public comment be received for information.

Clause 13-23 above was carried 12 votes to 0, the voting being as follows:

#### **For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.



14-23

**Presentation - Niuvaka Trust Introduction**

Presentation, by Dana Kunaiti, General Manager.

Dana Kunaiti from the Niuvaka Trust shared a presentation about who they are and what they do, they also requested further support from Council.

They are a Pasifika community provider catering to those in the Manawatū and Horowhenua. The presentation provided an overview of their services, partnership and alliances, and other agencies they are currently in collaboration with.

Dana Kunaiti made the following comments.

- Currently have approximately 700 clients registered for their services inclusive of approximately 1361 children.
- They have a diverse Pasifika representation across its board and staff.
- Through surveys and research it is noted the top needs have been identified in housing, health, food employment and education.
- Celebrated success of their 'Vaka' festival.
- The Trust currently receives funding through the Ministry of Social Development, but is working towards being financially self-sustaining.
- The Trust requested Council funds of \$200k to support their base-line running costs and \$35k to run their annual 'Vaka' festival. Ideally they would like the funding for 1 July 2023.
- Besides the funding, Council could also support the Trust by provide is by way of advocacy.

Elected Members moved an additional recommendation requesting the funding proposal be considered as part of the Annual Budget deliberations. They also sought further advice from staff on the proposal.

Moved Lorna Johnson, seconded Kaydee Zabelin.

The **COMMITTEE RESOLVED**

1. That the Committee receive the presentation for information.
2. That the request for funding for \$235k be referred to the Annual Budget deliberations.

Clause 14-23 above was carried 12 votes to 0, the voting being as follows:

**For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.

**15-23**

**Presentation - Grey Power Manawatū**

Presentation, by Lew Findlay, President Grey Power Manawatū and Sally Mayne, Grey Power Membership Secretary.

Grey Power Manawatū made a presentation requesting that the free parking for Gold Card holders be extended to 3.00pm Monday to Friday inclusive. The programme currently provides free parking from 9am – 12 noon on weekdays. Lew Findlay made the following comments in support of the request:

- Would enable further access to local businesses after 12.00pm, including those who volunteer.
- Recognises the increased cost of living for people on fixed incomes.
- When the hours were extended, in the past, from 11.00am to 12.00pm there was very little loss to revenue from parking.

Elected Members moved an additional recommendation seeking further officer advice on the implications of extending the current programme.

Moved Lorna Johnson, seconded Patrick Handcock.

The **COMMITTEE RESOLVED**

1. That the Community Committee receive the presentation for information.

Moved Patrick Handcock, seconded Kaydee Zabelin

2. That the Chief Executive provide a report back to the Committee on the implications of extending free parking for Gold Card and/or Community Services Card Holders from 9.00am to 12.00noon, to 9.00am to 3.00pm or 5.00pm.

Clause 15-23 above was carried 11 votes to 0, the voting being as follows:

**For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.

**Note:**

Councillor Lew Findlay declared an interest as he was the presenter. After answering questions, he withdrew from the discussion and sat in the gallery.

Moved Billy Meehan, seconded Debi Marshall-Lobb.

**Note:**

On a motion that: 'The Committee recommends that the Gold Card Parking

be extended to 9am-3pm Monday to Friday'. The motion was lost 3 votes to 8, the voting being as follows:

**For:**

Councillors Billy Meehan, Debi Marshall-Lobb and Leonie Hapeta.

**Against:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Orphée Mickalad, Karen Naylor, William Wood and Kaydee Zabelin.

**16-23**

**Presentation - Te Pū Harakeke - Social Wellbeing Forum 2022 Report**

Presentation, by Tim Kendrew (Kaiwhakahaere Matua).

Te Pū Harakeke shared a summary of the Social Wellbeing Forum 2022 Report. The purpose of the forum is to give a voice to the social and community sector and those working at the frontline of the city's social welfare organisations. The report highlights the issues for Council to be aware of in the sector.

Moved Lorna Johnson, seconded Patrick Handcock.

The **COMMITTEE RESOLVED**

1. That the Community Committee receive the presentation for information.

Clause 16-23 above was carried 12 votes to 0, the voting being as follows:

**For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.

The meeting adjourned at 10.54am

The meeting resumed at 11.12am

Councillors Rachel Bowen and Leonie Hapeta were not present when the meeting resumed at 11.12am.

**17-23**

**Confirmation of Minutes**

Moved Lorna Johnson, seconded Patrick Handcock.

The **COMMITTEE RESOLVED**

1. That the minutes of the Community Committee meeting of 15 March 2023 Part I Public be confirmed as a true and correct record.

Clause 17-23 above was carried 10 votes to 0, the voting being as follows:

**For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin and

Debi Marshall-Lobb.

**18-23**

**Age Friendly status and funding**

Memorandum, presented by Martin Brady, Community Development Advisor, and Stephanie Velvin, Community Development Manager.

The Committee moved a motion to consider funding for the programme at the Annual Budget deliberations and sought additional officer advice on developing a programme to achieving Age Friendly status.

Councillor Leonie Hapeta entered the meeting at 11.16am

Moved Lorna Johnson, seconded Patrick Handcock.

The **COMMITTEE RESOLVED**

1. That the Committee receive the report titled 'Age Friendly status and funding' presented to the Community Committee on 24 May 2023.

Moved William Wood, seconded Lew Findlay

2. The Committee resolve to refer a programme to develop an Age Friendly strategy/plan to the Annual Budget deliberations.

Clause 18-23 above was carried 11 votes to 0, the voting being as follows:

**For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.

**19-23**

**Development Subsidy request from the Methodist Church of New Zealand Te Haahi Weteriana o Aotearoa Manawatū Rangitikei Methodist Parish**

Memorandum, presented by Stephanie Velvin, Community Development Manager.

Councillor Rachel Bowen entered the meeting again at 11.31am.

Councillor Billy Meehan left the meeting at 11.38am

Moved Lorna Johnson, seconded Brent Barrett.

The **COMMITTEE RECOMMENDS**

1. That Council approve a Development Subsidy of \$13,000 for the Methodist Church of New Zealand Te Haahi Weteriana o Aotearoa

Manawatū Rangitikei Methodist Parish.

Clause 19-23 above was carried 9 votes to 0, with 1 abstention, the voting being as follows:

**For:**

Councillors Lorna Johnson, Brent Barrett, Rachel Bowen, Lew Findlay, Orphée Mickalad, Karen Naylor, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.

**Abstained:**

Councillor William Wood.

**Note:**

Councillor Patrick Handcock declared an interest, withdrew from the discussion and sat in the gallery.

**20-23**

**Community Places Stocktake and Needs Assessment - timeframes and resource requirements to give effect to the recommendations.**

Memorandum, presented by Stacey Solomon, Policy Analyst.

Moved Lorna Johnson, seconded Patrick Handcock.

The **COMMITTEE RESOLVED**

1. That the Committee receive the report titled "Community Places Stocktake and Needs Assessment - timeframes and resource requirements to give effect to the recommendations." dated 24 May 2023.

Clause 20-23 above was carried 11 votes to 0, the voting being as follows:

**For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Lew Findlay, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.

**21-23**

**Draft Gambling Venue Policies - Approval to Consult**

Report, presented by Julie Macdonald, Strategic Policy Manager.

Councillor Billy Meehan entered the meeting again at 11.57am.

Moved Lorna Johnson, seconded Patrick Handcock.

The **COMMITTEE RESOLVED**

1. That the Committee approve the Draft Gambling Venue Policies Statement of Proposal (Attachment 1) for consultation.

Clause 21-23 above was carried 11 votes to 0, with 1 abstention, the voting

being as follows:

**For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin and Debi Marshall-Lobb.

**Abstained:**

Councillor Leonie Hapeta.

## **22-23 Committee Work Schedule - May 2023**

Elected Members requested an update on Library Services as this is included in the Terms and Reference of the Committee. They would like to commence this as an annual report.

Moved Lorna Johnson, seconded Patrick Handcock.

The **COMMITTEE RESOLVED**

1. That the Community Committee receive its Work Schedule dated May 2023 including an annual report on Library Services.

Clause 22-23 above was carried 12 votes to 0, the voting being as follows:

**For:**

Councillors Lorna Johnson, Patrick Handcock, Brent Barrett, Rachel Bowen, Lew Findlay, Billy Meehan, Orphée Mickalad, Karen Naylor, William Wood, Kaydee Zabelin, Debi Marshall-Lobb and Leonie Hapeta.

## **Karakia Whakamutunga**

Councillor Lorna Johnson closed the meeting with karakia.

The meeting finished at 12.24pm

Confirmed 9 August 2023

**Chair**



## SUBMISSION FROM CONSULTATION

**TO:** Community Committee

**MEETING DATE:** 9 August 2023

**TITLE:** Hearing of Submissions: Draft Gambling Venue Policies 2023

### RECOMMENDATION(S) TO COMMUNITY COMMITTEE

1. That the Community Committee hear submissions from presenters who indicated their wish to be heard in support of their submission.
2. That the Committee note the Procedure for Hearing of Submissions, as described in the procedure sheet.

### SUBMITTERS WISHING TO BE HEARD IN SUPPORT OF THEIR SUBMISSION

Submission No.	Submitter	Page No.
40	<b>Don Martin</b> , NZ Community Trust	91
44	<b>Samantha Alexander</b> , The Lion Foundation	126
8	<b>Jarrold True</b> , Gaming Machine Association of NZ	28
39	<b>Colleen Maxwell</b> , Masonic Hotel	90
45	<b>Kirsty Kang</b> , Policy and Public Health Manager	155
36	<b>Robert Holdaway</b> , National Public Health Service (Midcentral) – Te Whatu Ora	83
52	<b>Adam Parker</b> , Regional Manager, Hospitality NZ	195
53	<b>Lukas Dreyer</b> , ExMed for Cancer Charity	199
51	<b>Martin Cheer</b> , Pub Charity Ltd	175

### ATTACHMENTS

1. Submissions 1-71 [↓](#) 
2. Hearing Procedure Sheet [↓](#) 



### Submissions on Draft Gambling Policies 2023

Submission No	Submitter	Contact Person
1	Joshua Thompson	
2	Dawn Britz	
3	Chantelle Miles	
4	Simone Laing	
5	Tim Coulson	
6	Taylor Kearns	
7	Riley Rutherford	
8	Gaming Machine Association of New Zealand	Jarrold True
9	Siân Munson	
10	Robert van Bentum	
11	Ruth Bucknell	
12	Barbara Taniyama	
13	Alex Westwood	
14	Julie Bunnell	
15	Niki Burtenshaw	
16	Palmerston North Police	Andrew Brooke
17	Air Rescue Services Ltd (Air Rescue)	Barry Steans
18	Sam Rowe	
19	Chrissy Severinsen	
20	Quentin McCarthy	
21	Gillian Evans	
22	Cheralyn Sorrell	
23	Mariana Bishop	
24	Dianne Eales	
25	Wayne Shewell	
26	Anthony Jex	
27	Diana Keith	
28	Central Football	John McGifford
29	Katie Cronin	
30	Jenifer Mark	
31	Jean Archer	

### Submissions on Draft Gambling Policies 2023

Submission No	Submitter	Contact Person
32	Steve Rumney	
33	Jonathan Michael	
34	Dean Luoni	
35	Basketball Manawatu Incorporated	Mike Ryan
36	National Public Health Service (MidCentral) - Te Whatu Ora	Robert Holdaway
37	Hockey Manawatu	Jake Inwood
38	Lachlan Wingfield-Smith	
39	Masonic Hotel	Colleen Maxwell
40	NZ Community Trust	Don Martin
41	Thomas Cleland	
42	Asian Family Services	Ivan Yeo
43	Aperira McGregor	
44	The Lion Foundation	Samantha Alexander
45	Problem Gambling Foundation Group	Kirsty Kang
46	Youthline Central North Island	Shane Casey
47	Alzheimers Society Manawatu Inc	Tracy Lynn
48	Dannevirke ASC	Lin Tozer
49	Manawatū Jazz Club	David Edge
50	Palmerston North United F.C.	Michael Sheridan
51	Pub Charity Ltd	Martin Cheer
52	Hospitality New Zealand	Adam Parker
53	ExMed for Cancer charity	Lukas Dreyer
54	Palmerston North Bird Club Inc	Peter Russell
55	PN Marist Football Club	Rachel Findon
56	Te Pae Poitarawhiti o Ikaroa ki te Raki	Loren Goss
57	Diabetes New Zealand	Heather Verry
58	Legacy Centre, Legacy Housing, Legacy Property Group	Donna Cardno
59	Northern Club (Manawatu) Inc.	Christine Quinn
60	Te Ha Ora The Asthma and Respiratory Foundation	Pam Francombe

### Submissions on Draft Gambling Policies 2023

Submission No	Submitter	Contact Person
61	Vision Community Trust	Alex Sinclair
62	Snapback Gym	Lucy Terry
63	Massey Netball Club	Sarika Rona
64	Palmerston North Boys' High School	Deb Burgess
65	Cycling NZ	Simon Peterson
66	PACANZ	Nikki Cunningham
67	Motor Neurone Disease New Zealand Charitable Trust	Jeanette Franklyn
68	Manawatu Smallbore Rifle Association	Bruce Marchant
69	Netball NZ	David Cooper
70	Manawatu Rugby Union	Andrea Jackson
71	Manfeild Park Trust	Kathy Gibson





## Draft Gambling Policies 2023 Submission

Your contact details	
First name	Joshua
Last name	Thompson
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	I don't see why a venue moving should be allowed to keep its pokies. While it may be the same from a venue perspective, the pokies will be new to the community they're moving to. Venues moving location should be required to give up their pokies.
Supporting information	

## Draft Gambling Policies 2023 Submission

Your contact details	
First name	Dawn
Last name	Britz
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	Stop trying to nanny your citizens.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	Leave it alone.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	The proposals reduce policies to the needs of the problem gamblers. Of course they will just move their gambling addiction to another source. Nothing will change, you will just stifle business, the last thing Palmerston North needs.
Supporting information	

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Chantelle
Last name	Miles
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Get rid of pokie machines all together terrible things! Not required at all. Was very disappointed to see rongotea taven get granted 18 new ones for the size of the community that is ridiculous!
Supporting information	

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Simone
Last name	Laing
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	I support the movement to try and reduce the impact gambling has in Palmy.
Supporting information	

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Tim
Last name	Coulson
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	The issue with this that every boomer doesn't consider is the exact same reason why vaping is so prominent in our communities. When you guys make it hard to access regulated gambling machines people will and have turned to online slot machines. These scum websites have little to not regulation, are accessible anywhere and anytime, and are far more addictive than any pub machine.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	As someone who refrains from using pokies machines but has also seen damage they can cause, I think it is stupid to make machines less accessible. Identifying addicts and getting them support is much easier when you can see them gambling if you remove the machines people who need support the most will simply move to online gambling. I can guarantee we will see the same trickle effect as vaping has in our youth.
Supporting information	

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Taylor
Last name	Kearns
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	



### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Riley
Last name	Rutherford
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	Yes
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	I personally see this addiction ruining lives so the less opportunities around, the better.
Supporting information	

## 8-1

## The Gaming Machine Association of New Zealand's Submission on Palmerston North City Council's Gambling Venue Policy

### Introduction

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

### Summary

2. The relocation provision should be expanded to enable venues to move if the new location is in a lower deprivation area, to move out of residential areas, 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. Currently 18 of the 21 venues are in very high deprivation areas. Currently half of all the venues are located in the suburbs or villages. **We should not have to wait for a fire, flood, or public works acquisition to move a venue out of a suburban high deprivation area to a more suitable, lower deprivation area. Venue relocation is a harm minimisation tool.**
3. The current cap of 347 gaming machines should be retained. The current policy cap is working and is reasonable. There is no new evidence or new concern that would justify the adoption of a more restrictive policy cap. Gaming machine numbers have naturally decreased under the current policy setting.

### Expanding the Relocation Provision

4. In September 2013, Parliament recognised the merit in enabling venues to relocate, and expressly amended the Gambling Act 2003 to enable venues to relocate and retain the same number of machines when a relocation consent was obtained.
5. The amendment was not made to help venues who found themselves needing to move due to circumstances beyond their control. The amendment was made to encourage and facilitate venues to move from undesirable locations to more desirable locations. In the in committee reading of the Gambling (Gambling Harm Reduction) Amendment Bill (the Bill that led to the enactment of section 97A), the Bill's sponsor, Te Ururoa Flavell, stated<sup>1</sup>:

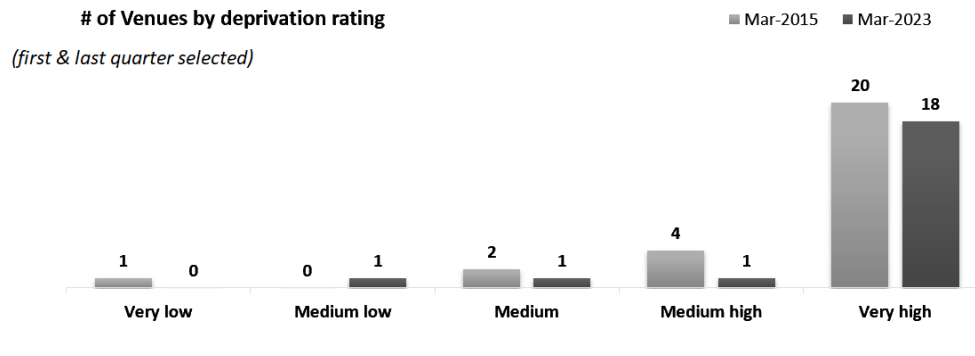
The Government... wanted to allow venues, with permission from territorial authorities, to move their pokie machines out of harm's way—perhaps to central business districts...

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1 [https://www.parliament.nz/en/pb/hansard-debates/rhr/document/50HansD\\_20130807\\_00000040/gambling-gambling-harm-reduction-amendment-bill-in](https://www.parliament.nz/en/pb/hansard-debates/rhr/document/50HansD_20130807_00000040/gambling-gambling-harm-reduction-amendment-bill-in)

## 8-2

6. Venue relocation is a harm minimisation tool.
7. Currently 18 of the 21 venues in Palmerston North are in very high deprivation areas:



8. If a venue wishes to relocate out of a high deprivation area to a lower deprivation area, the policy should permit this. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in high deprivation locations.
9. The social impact report notes that currently half of all the venues are located in the suburbs or villages.
10. If a venue wishes to relocate out of a suburban/residential area to a more suitable area, such as a central business district, the policy should permit this. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in undesirable residential locations.
11. The relocation provision should not be limited to circumstances where the venue, due to no fault of its own, cannot continue to operate at the existing site: i.e., relocation should not be limited to cases where there has been a natural disaster, fire, or public works acquisition. **We should not have to wait for a fire or earthquake to move machines from undesirable areas to more desirable areas. We should seize every such opportunity and promptly facilitate it.**
12. The relocation policy should also 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.
13. 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.

## 8-3



The old Te Rapa Tavern



The new Te Rapa Tavern

14. 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 areas of land, which may be better used for affordable high-density housing.
15. It would be reasonable to allow venues to move out of earthquake-prone buildings to stronger, more modern buildings. This is a health and safety issue.
16. 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.

#### Gaming Machine Funding

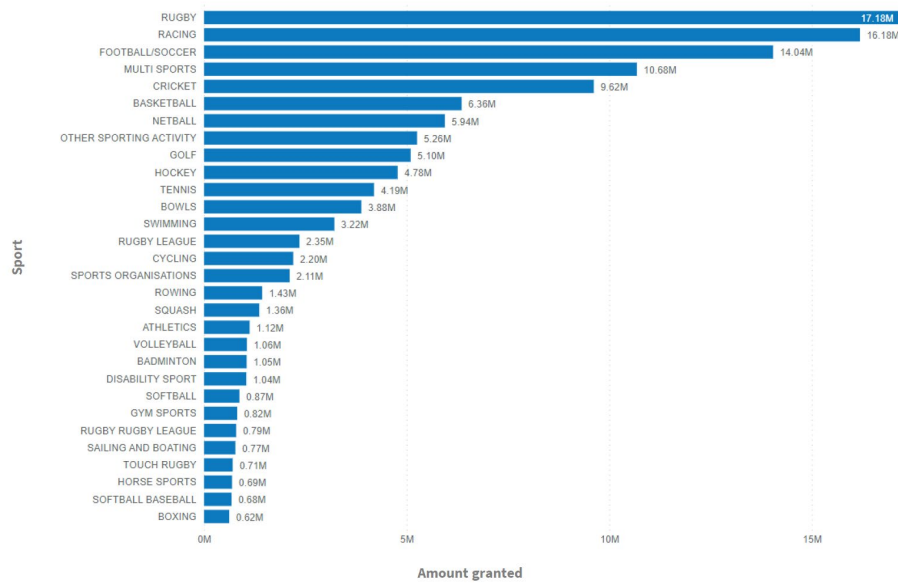
17. The Gambling Act 2003 seeks to balance the potential harm from gambling against the benefits of using gaming machines as a mechanism for community fundraising.
18. In 2021, approximately \$269m of grant funding was approved across 19,148 grants to 10,967 different organisations.<sup>2</sup> In addition, over \$50m was applied by various RSAs and Workingmen's Clubs (\$50m) to support their own activities. 54% of the grants distributed in 2021 were sports-related. The second most popular category was community (20%). This funding is crucial.

<sup>2</sup> <https://www.gamblinglaw.co.nz/download/Class-Four-Gaming-Analytical-Review-2021.pdf>

8-4



**APPROVED POKIE GRANTS BY SPORT**



19. The local benefit from the gaming machine funding includes the following:

- External grants made to local community groups;
- External grants made to national and regional organisations that provide services and support locally; and
- Gaming profits used by local club venues to fund the upkeep of their clubrooms and to provide sporting and recreational facilities to their members.

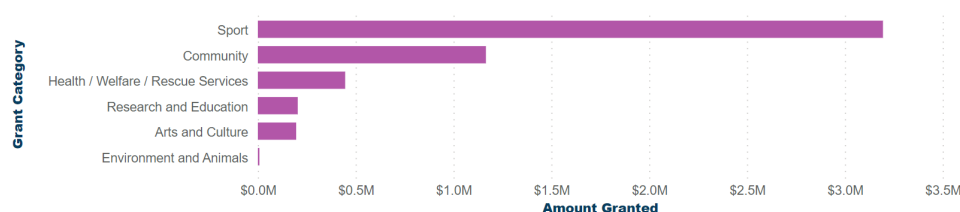
## 8-5

*External Grants*

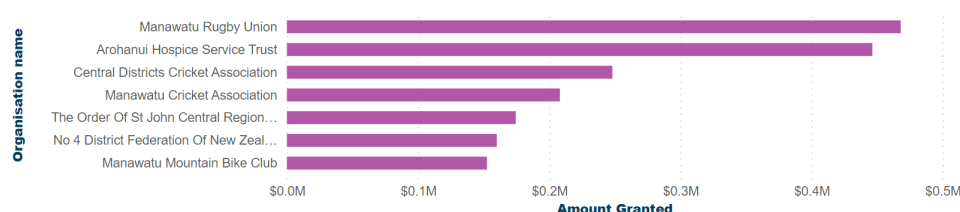
20. The amount of grants made to Palmerston North City-based organisations is posted on the [granted.govt.nz](https://granted.govt.nz) website. In 2021, grants totalling **\$5,217,283.00** were made.

**Amount Granted by Category**

Year of Acceptance ● 2021

**Amount Granted by Organisation**

Year of Acceptance ● 2021

*Grants to National and Regional Organisations*

21. Approximately 6% of all grants are made to national and regional organisations. For example, if St John sought funding for a new ambulance for the Palmerston North station, the funding application would be made by the Auckland-based head office, and the funding allocated to Auckland, despite the grant having a direct benefit to Palmerston North City.

*Club Authorised Purpose Payments*

22. Three of the 21 venues that operate gaming in Palmerston North are clubs:
- Ashhurst Memorial RSA – 6 gaming machines
  - Manawatu Darts Association – 7 gaming machines
  - Palmerston North Cosmopolitan Club – 18 gaming machines
23. The gaming machine proceeds are used by these clubs to benefit the very members who play the machines. All the profits remain within the local economy. Clubs are required to publish their accounts on the Incorporated Societies website or the Friendly Societies

## 8-6

website. The accounts set out the gross gaming revenue, the gaming profits, and how the profits are allocated.

24. By way of example, in the year ended 31 December 2020, the Palmerston North Cosmopolitan Club made a profit of \$247,578.00 from its gaming machines and used this money for repairs and maintenance to the clubrooms, rates, and other non-bar-related operational costs.

#### Gambling is an Enjoyable Activity

25. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2018 Health and Lifestyles Survey<sup>3</sup> found that 67.2% of adult New Zealanders had participated in some form of gambling in the previous 12 months (estimated to be 2,650,000 adults).



**7 in 10 New Zealand adults take part in some form of gambling at least once a year – 1 in 500 New Zealand adults has a gambling problem.**

26. The majority of people who gamble do so because they find it an enjoyable activity. This is observed by Suits (1979, p. 155)<sup>4</sup>, who states:

Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.

27. Gambling for the non-addicted gambler may also be an avenue for socialising, stress relief and a way of having fun. Contrary to how it may appear from a non-gambler's perspective, gamblers do not necessarily anticipate they will make money from gambling. Parke (2015)<sup>5</sup> states:

Players mostly realise that they are paying for a leisure experience. They are not expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.

3 <https://www.hpa.org.nz/research-library/research-publications/2018-health-and-lifestyles-survey-methodology-report>

4 Suits, D. (1979). The Elasticity of Demand for Gambling. The Quarterly Journal of Economics, 93(1), 155–162. <https://doi.org/10.2307/1882605>

5 Parke, J. (2015). Gambling, leisure and pleasure: Exploring psychosocial need satisfaction in gambling. Presentation at the KPMG eGaming summit. <https://assets.kpmg/content/dam/kpmg/pdf/2016/07/im-esummit-report-2015.pdf>.

## 8-7

### Positive Wellbeing Impact from Gambling in New Zealand

28. The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis<sup>6</sup>, found that gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.74b to \$2.16b per annum.



### Revenue Breakdown

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

#### **Typical Distribution of Gaming Machine Profits**

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	1.08%	1.23%
DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.53%	43.16%

### Gaming Machines – Key Facts

30. 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

<sup>6</sup> [https://www.gamblinglaw.co.nz/download/Gambling\\_in\\_New\\_Zealand.pdf](https://www.gamblinglaw.co.nz/download/Gambling_in_New_Zealand.pdf)



## 8-8

was issued to Pub Charity on 25 March 1988, over 35 years ago.

31. Gaming machine numbers are in natural decline. In 2003, New Zealand had 25,221 gaming machines. In March 2023, New Zealand had 14,464 gaming machines.
32. The proceeds from non-casino gaming machines increased 3.1% from \$895 million in 2018 to \$924 million in 2019. However, after adjusting for both inflation and changes in the adult population, expenditure on non-casino gaming machines is declining (\$242 per person in both 2015/16 and 2016/17 years to \$238 in the 2017/18 year). This coincides with declining numbers of venues and machines.
33. New Zealand has a very low problem gambling rate by international standards. The New Zealand National Gambling Study: Wave 4 (2015)<sup>7</sup> found the problem gambling rate was 0.2% of people aged 18 years and over (approximately 8,000 people nationally). The problem gambling rate is for all forms of gambling, not just gaming machine gambling.
34. All gaming machine societies contribute to a problem gambling fund. This fund provides over \$25 million per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The funding is ring-fenced and not able to be redirected to other health areas.
35. 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).

### Existing Gaming Machine Safeguards

36. A more restrictive policy is not necessary given the significant measures that are already in place to minimise the harm from gaming machines.
37. 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.
38. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
39. 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

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<sup>7</sup> <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-6-aug18.pdf>

**8-9**

prize for a non-jackpot machine is \$500.00. The maximum prize for a jackpot-linked machine is \$1,000.00.

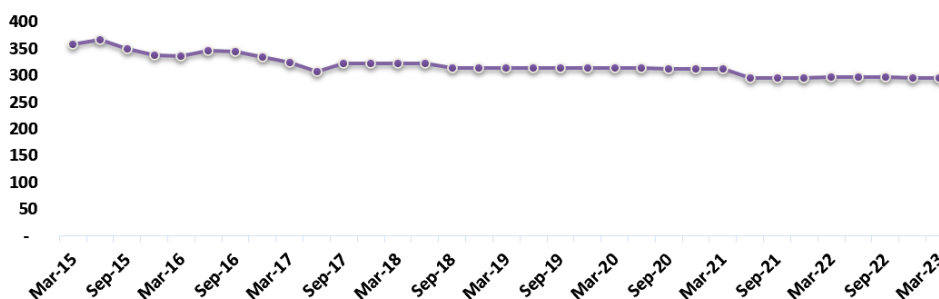
40. All gaming machines in New Zealand have a feature that interrupts play and displays a pop-up message. The pop-up message informs the player of the duration of the player's session, the amount spent, and the amount won or lost. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.
41. Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
42. ATMs are excluded from all gaming rooms.
43. All gaming venues have a harm minimisation policy.
44. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
45. 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.
46. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
47. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
48. It is not permissible for a player to play two gaming machines at once.
49. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
50. 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).
51. It is not permissible to use the word "jackpot" or any similar word in advertising that is visible from outside a venue.

The Status Quo Cap is Reasonable

52. The status quo cap of 347 machines is reasonable, given the current environment of high regulation and naturally reducing machine numbers.
53. Gaming machine numbers have naturally declined under the current policy cap:

## 8-10

Number of gaming machines



54. 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).
55. The 2012 National Gambling Survey<sup>8</sup> concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report stated on pages 17 and 18:

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

56. The New Zealand National Gambling Study: Wave 3 (2014)<sup>9</sup> noted that the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing. The report stated on page 19:

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

...gambling participation has decreased substantially in New Zealand during the past 20 years, and problem gambling and related harm has probably plateaued...

57. 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*

<sup>8</sup> <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-2.docx>

<sup>9</sup> <https://www.health.govt.nz/publication/new-zealand-national-gambling-study-wave-3-2014>

## 8-11

*Like a Horse and Carriage?* The paper noted that gaming machine reductions and the introduction of caps generally appear to have little impact on problem gambling rates. Professor Abbott noted:

EGM reductions and the introduction of caps generally appear to have little impact (page 1).

Over time, years rather than decades, adaptation ('host' immunity and protective environmental changes) typically occurs and problem levels reduce, even in the face of increasing exposure (page 6).

Contrary to expectation, as indicated previously, although EGM numbers and expenditure increased substantially in New Zealand from 1991 to 1999, the percentage of adults who gambled weekly dropped from 48% to 40%. This is of particular interest because it suggests that greater availability and expenditure do not necessarily increase high-risk exposure (page 14).

58. Introducing a more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups based in Palmerston North. 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

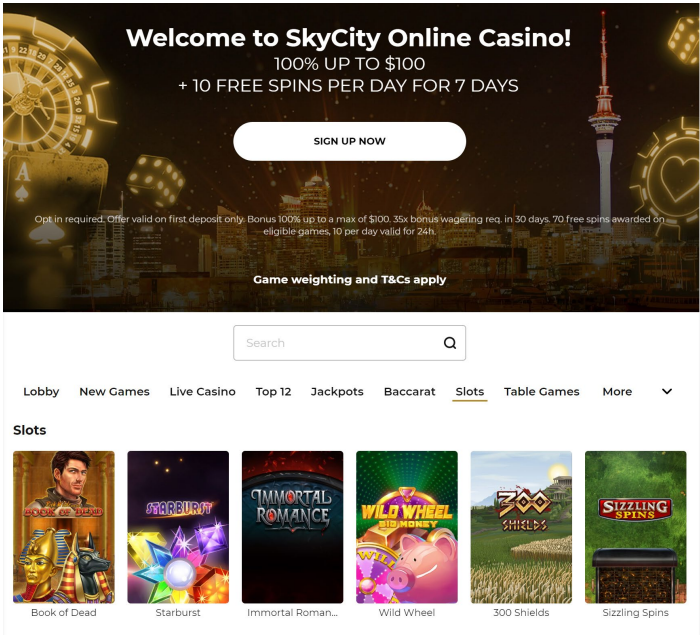
59. Any reduction in the local gaming machine offering may have unintended consequences, as this may simply lead to a migration of the gambling spend to offshore internet- and mobile-based offerings. While it is illegal to advertise overseas gambling in New Zealand, it is not illegal to participate in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



60. 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.

8-12

- 61. There is no question that New Zealanders love gambling online. TAB New Zealand noted in its 2022 six-monthly report that online channels made up 59.2 per cent of its betting turnover, up 2.2 percentage points on last year. It also said that its online platforms were the fastest-growing channels.
- 62. SkyCity has a very popular offshore-based online casino with a large selection of gaming machine games.



- 63. TAB New Zealand estimates that the total online spend with offshore gambling websites by New Zealanders for the 12 months to August 2020 was \$570-\$580m.
- 64. The migration from physical Lotto stores and SkyCity was apparent during the Covid-19 lockdowns. When the physical venues were closed, the number of online registered players, and the amount of online revenue, skyrocketed.

**8-13**

NZ Lotteries Commission 'MyLotto'			
	FY20	FY19	FY18
Registered Players	1,230,000	845,000	746,000
Increase on previous Year	45.6%	13.3%	17.1%
MyLotto Sales	\$430.6m	\$227.6m	\$201.1m
Increase on previous Year	89.2%	13.2%	25.8%
% of Total Lotto Sales	31%	19%	16%

(Information sourced from annual reports)

Sky City Casino NZ Online Casino			
KPI's	FY21	FY20	Movement
Customer Registrations	48,958	25,661	90.8%
First Time Depositors (new actives)	28,114	15,855	77.3%
Deposit Conversion	57%	62%	n/a
Total Bets	\$792.5m	\$253.5m	212.5%
Gaming Revenue	\$27.9m	\$10.2m	173.5%
Operating Costs & Taxes	\$14.8m	\$5.6m	n/a
Profit	\$13.1m	\$4.5m	190.6%

(Information sourced from annual reports)

65. Offshore-based online gambling poses considerable risks because it:

- Is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
- Has no restrictions on bet sizes;
- Has no capacity for venue staff to observe and assist people in trouble;
- Reaches new groups of people who may be vulnerable to the medium;
- Provides no guaranteed return to players;
- Is more easily abused by minors;
- Has reduced protections to prevent fraud, money laundering or unfair gambling

**8-14**

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.
66. Offshore-based online gambling does not generate any community funding for New Zealanders, does not generate any tax revenue for the New Zealand Government, and does not make any contribution to the New Zealand health and treatment services as no contribution is made to the problem gambling levy.

Council Conflicts of Interest

67. It is important that the committee of councillors that determines the gambling venue policy reflects the full views of the community. It has, however, become common for councillors who are involved in community and sporting groups to withdraw from the gambling venue policy deliberation as they consider the receipt of funding by a group that they are associated with constitutes a conflict. It has also been common for councillors with very strong, pre-determined anti-gambling views to refuse to withdraw from the policy deliberation, despite their strongly held views.
68. The Association has sought independent legal advice (copy attached) from Brookfields Lawyers regarding gambling venue policy conflicts. In summary, the key advice is:
- Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g., a coach who is paid for that service); and
  - Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

Oral Hearing

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

13 June 2023

**Jarrod True**

Counsel

Gaming Machine Association of New Zealand

jarrod.true@truelegal.co.nz

027 452 7763

gmanz.org.nz

15 March 2021

By Email: chair@gmanz.nz

Gaming Machine Association of New Zealand  
c/o Peter Dengate-Thrush  
Independent Chair

**ATTENTION:** Peter-Dengate Thrush

#### **GAMBLING VENUE POLICY - CONFLICT OF INTEREST**

We refer to your email instructions of 26 February 2021, seeking our advice regarding councillor conflicts of interest with respect to decision-making on Council's gambling venue policy.

#### **YOUR QUESTIONS**

1. You have asked us to advise whether:
  - a. Membership of a club or organisation that receives gaming machine grant funding would constitute a conflict of interest that would require the councillor to withdraw from decision-making or discussion regarding a proposed gambling venue policy; and
  - b. If Council has itself received gambling grant funding, does this impact on its ability to decide on a gambling venue policy, such that the decision should be made by an independent commissioner?

#### **EXECUTIVE SUMMARY**

1. In summary:
  - a. If an elected member has a financial interest in a club or organisation that may be impacted by the gambling venue policy, the member must not participate in any discussion or decision-making on the policy. It would be rare for a financial interest to arise in this context, but examples may be where the elected member is in a paid role at a club or organisation, and the role is funded from a gaming grant. A more remote interest may arise where the quantum of membership fees paid to a club or organisation may be impacted by a gaming grant. In those circumstances,

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it may be prudent to seek a decision from the Auditor-General as to whether the potential interest is deemed too remote to influence decision-making.

- b. Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to a conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g. a coach who is paid for that service).
  - c. Being a member of a club or organisation that operates a gaming licence will give rise to a conflict of interest, particularly where the elected member serves in an executive role at the club or organisation.
  - d. Where an elected member, outside of a debate on the issue, had expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.
2. The fact that Council may have previously been the recipient of gaming grant money would not create a conflict of interest when deciding its gambling venue policy. Such democratic decision-making is fundamental to its role and is distinguishable from regulatory or quasi-judicial decision-making where appointment of an independent commissioner may be appropriate to avoid any appearance of bias. The decision-making processes in the Local Government Act 2002 (LGA) already impose important requirements to ensure that such decision-making involves consideration of broader community views and not just the interests of Council as an organisation. It would therefore be unnecessary and inappropriate to appoint an independent commissioner because Council initiatives may have previously benefited from gaming grants.

## ANALYSIS

3. Under section 101 of the Gambling Act 2003 (GA), territorial authorities must, using the special consultative procedure in section 83 of the LGA, adopt a policy that specifies whether class 4 venues may be established in the district, and if so, where they may be located (**the policy**). The policy may also specify any restrictions on the maximum number of gaming machines that may be operated at a class 4 venue and may include a relocation policy.

*Does membership of an organisation or club create a conflict of interest for participation in discussion or decision-making on gambling venue policies?*

4. It is not uncommon for councillors to be members of organisations and clubs, some of which may receive grant funding from gaming machines. This raises the question of whether membership of such a club or organisation would constitute a conflict of interest that would prevent the councillor from participating in discussion or decision-making regarding the policy.
5. Broadly speaking, a conflict of interest occurs when an elected member is affected by some other interest that he or she has in their private life. There are different types of conflict of interest:

gLthead

- a. Financial conflicts of interest – where the member (or their spouse or partner) has a direct or indirect financial interest in a particular decision, they cannot discuss or vote on the matter.<sup>1</sup>
- b. Non-financial conflicts of interest.

Financial conflicts of interest

6. The applicable legislation is the Local Authorities (Members' Interests) Act 1968 (**LAMIA**). While the LAMIA does not define what a financial interest is, section 6(2) outlines a number of examples where a member will be deemed to have a financial interest:
  - The member, or his or her spouse, owns 10% or more of the issued capital of an incorporated company or any company controlling that company, that has a pecuniary interest (direct or indirect) in a matter before the local authority or committee; or
  - The member, or his or her spouse, is a member of the company and either of them is the managing director or the general manager of the company; or
  - The member, or his or her spouse, is a member of a company controlling the company having a pecuniary interest in the matter before the local authority or committee, and either the member, or his or her spouse, is the managing director or the general manager; or
  - The member, or his or her spouse, is the managing director or general manager of the company, and either of them is a member of a company controlling that company.
7. Other than these examples, the LAMIA does not define what a "financial interest" is. However, the Auditor-General has described a "financial interest" as "a reasonable expectation of financial loss or gain from the particular decision".<sup>2</sup>
8. It is unlikely that membership alone of a community organisation that receives gaming grant funding would give rise to a financial interest. This is because such organisations and clubs are usually run on a not-for-profit basis. One example where a financial interest could potentially arise would be if the member were in a paid position at the club or organisation, and the funding for that position comes from gaming grants. Another example may be where there is a prospect that membership fees or subscriptions to a club could be affected by the amount of gaming grant funding. However, given that gambling venue policies are relatively high-level in nature and do not directly address matters such as the licensing of particular venues (which involve a separate decision-

<sup>1</sup> Section 6(1) of the Local Authorities (Members' Interests) Act 1968.

<sup>2</sup> Controller and Auditor-General, **Local Authorities (Members' Interests) Act 1968: A Guide for members of local authorities on managing financial conflicts of interest**, June 2020, at 4.15, referring to the definition of a financial interest in **Downward v Babington** [1975] VR 872.

making process, often by Council officers acting under delegated authority), or allocation of gaming grants (which are decided by the organisations that operate gaming licences subject to statutory requirements), any such potential impact is likely to be too speculative or remote to constitute a financial interest in the decision-making on a gambling venue policy.

9. Notwithstanding this view, where an elected member may receive a financial benefit of the kind described above from a club or organisation receiving gaming grant funding, they may as a matter of prudence wish to first obtain an exemption from the Auditor-General under section 6(3)(f) of the LAMIA (on the grounds that the financial interest is too remote or insignificant to be regarded as likely to influence him or her in voting or taking part in the discussion of the policy) before participating in discussion or decision-making on the policy. It is a relatively simple process to apply for such an exemption.

#### Non-financial conflicts of interest

10. A non-financial conflict of interest is any situation where a member is not affected financially by a decision but is affected in some other way that may constitute bias or the appearance of bias. Non-financial conflicts of interest are relevant to the avoidance of bias in decision-making. As opposed to financial interests, which can create personal liability for an elected member, bias is a matter of Council's accountability to the public. The avoidance of bias is part of the administrative law principles of natural justice, which require the Council to act fairly in reaching its decisions. The fairness principle has been described in these terms:<sup>3</sup>

In exercising that discretion, as in exercising any other administrative function, they [members] owe a constitutional duty to perform it fairly and honestly ... What is a fair procedure to be adopted at a particular enquiry will depend upon the nature of its subject matter.

11. The test for whether an interest may give rise to an apparent bias has been stated by the Court of Appeal as being where circumstances:<sup>4</sup>

...might lead a fair-minded lay observer to reasonably apprehend that the judge might not bring an impartial mind to the resolution of the instant case.

12. Unlike a financial conflict of interest, a potential non-financial conflict does not automatically exclude a member from participating in a decision. It will depend on how serious the conflict is. The Auditor-General has suggested a number of factors that may be relevant to an assessment of whether a potential conflict is serious enough to exclude a member from participation in decision-making. They include:<sup>5</sup>

- The type or size of the person's other interest;
- The nature or significance of the particular decision or activity being carried out by the public organisation;
- The extent to which the person's other interest could specifically affect, or be affected by, the public organisation's decision or activity; and

<sup>3</sup> **Bushell v Secretary of State for the Environment** [1981] AC 75, 95.

<sup>4</sup> **Muir v Commissioner of Inland Revenue** [2007] 3 NZLR 495.

<sup>5</sup> Controller and Auditor-General, **Managing conflicts of interest: A guide for the public sector**, June 2020, at 4.31.

- The nature or extent of the person's current or intended involvement in the public organisation's decision or activity.

13. In our view, in the context of decision-making on a gambling venue policy, the mere fact that an elected member is also a lay member of an organisation or club that receives gaming grant funding is unlikely to give rise to a conflict of interest. This is because of the level of remoteness from any possible benefit or loss associated with the decision-making. In most cases, the contents of a gambling venue policy will not directly impact on funding that has or may be received by a club or organisation from gaming machine grants. The purpose of the policy is to specify whether class 4 venues may be established, and if so their location. It can also specify restrictions on the number of gaming machines that may operate at a class 4 venue. Such matters do not necessarily impact directly on whether a club or organisation may receive gaming grant funding, and if so, the amount of any such grant. Funding decisions are made by the organisations who operate the gaming machines, not the Council. The fact that a member, by virtue of membership of a club or organisation that has received gaming grants, has knowledge or experience of the beneficial impacts that gaming grants can have on the community does not give rise to a conflict of interest. To the contrary, it may contribute to a fair and balanced consideration of the issues arising when making decisions on a gambling venue policy. This would be consistent with the purpose of the GA, which is *inter alia* to ensure that money from gambling benefits the community and to facilitate community involvement in decisions about the provision of gambling.<sup>6</sup>

14. It is important to distinguish between membership of a club or organisation that receives gaming grants, and membership of a club or organisation that holds a gaming licence. In our view, while the former would not give rise to a conflict of interest in decision-making on a gambling venue policy, there is a much greater likelihood that the latter could give rise to a conflict of interest. This is particularly the case if the elected member holds an executive role in the club or organisation that operates a gaming licence. This is because, while a gambling venue policy does not specify whether or not a particular club or organisation is able to obtain a gaming licence *per se*, the policy may affect the eligibility of a club or organisation to hold a licence. As such, participation in the discussion or decision-making by a member of any such club or organisation could create an appearance of bias and therefore a conflict of interest.

15. Elected members should also always be mindful of avoiding predetermination, i.e., approaching decision-making with a closed mind. Elected members are entitled (and expected) to bring their previous knowledge and experiences to decision-making, but to approach any decision with an open mind. This means that elected members should be cautious about being vocal, other than in the course of Council debates, about particular views in a manner that may suggest that they do not and cannot have an open mind on a particular matter. This is because a conflict of interest may arise as a result of possible predetermination (i.e. actual or perceived bias).

16. In summary:

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<sup>6</sup> Section 3 of the GA.

- a. If an elected member has a financial interest in a club or organisation that may be impacted by the gambling venue policy, the member must not participate in any discussion or decision-making on the policy. It would be rare for a financial interest to arise in this context, but examples may be where the elected member is in a paid role at a club or organisation, and the role is funded from a gaming grant. A more remote interest may arise where the quantum of fees paid to a club or organisation may be impacted by a gaming grant. In those circumstances, it may be prudent to seek a decision from the Auditor-General as to whether the potential interest is deemed to remote to influence decision-making.
- b. Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to a conflict of interest when it comes to deciding or discussing Council's gaming venue policy.
- c. Being a member of a club or organisation that operates a gaming licence will give rise to a conflict of interest, particularly where the elected member serves in an executive role at the club or organisation.
- d. Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

*Would Council be conflicted in deciding a gambling venue policy because it has previously received gaming grants?*

17. Council initiatives will frequently fall within the second category of the definition of an "authorised purpose" for which gaming proceeds may be used, as set out in section 4 of the GA i.e., "a non-commercial purpose that is beneficial to the whole or a section of the community". Notwithstanding the eligibility for Council initiatives to receive gaming grants, Parliament conferred territorial authorities with the responsibility of formulating a gaming venue policy for their districts. We do not consider that any conflict of interest would arise in relation to decision-making on a gambling venue policy because the Council may have previously been awarded gaming grants. This is because:

- a. While individual elected members are subject to the LAMIA which prevents them from participating in decision-making where they have a financial interest, Council as an entity is not subject to the LAMIA.
- b. Caselaw recognises the inevitability of a degree of conflict within councils when exercising certain statutory functions. It is established, for example, that a council may object to its own district plan, prosecute itself, and apply to itself for a resource consent.
- c. The standard of impartiality for a Council is that it must approach its duty of inquiring into submissions with an open mind.<sup>7</sup> Given the requirement to undertake a special consultative process and the diverse views of individual members, it is unlikely that the fact that certain projects

<sup>7</sup> *Lower Hutt City Council v Bank* [1974] 1 NZLR 545 at 550.

undertaken by Council have benefited from gaming grants would unduly influence Council decision-making on its gambling venue policy. For the same reasons outlined above in relation to individual members, the connection between gaming grant money and decision-making on gambling venues is too remote to constitute a conflict of interest. In any event, compliance with the statutory rules in the LGA regarding decision-making by local authorities<sup>8</sup> and the general principles relating to local authorities<sup>9</sup> are intended to ensure that Council decision-making is open, transparent, and has regard to the diversity of community interests, notwithstanding the many facets and activities undertaken by Council.

18. We note that Council is not undertaking a quasi-judicial role when formulating a gambling venue policy. There is greater need to avoid the appearance of bias when it comes to regulatory or quasi-judicial decision making (such as considering a resource consent application). In those circumstances, where there is an apparent conflict in Council's interests, it is common for Council to delegate its decision-making to an independent commissioner. To that end, the Resource Management Act 1991 (**RMA**) specifically allows for the appointment of independent commissioners to decide consent applications. However, while Council may delegate its decision-making on a gambling venue policy to a particular committee or sub-committee of Council, it would be unnecessary (and in our view, inappropriate) to delegate such decision-making to an independent commissioner.

Yours faithfully  
**BROOKFIELDS**

  
**Linda O'Reilly**  
Partner

Direct dial: +64 9 979 2167  
email: oreilly@brookfields.co.nz

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<sup>8</sup> Section 76 of the LGA.

<sup>9</sup> Section 14 of the LGA.

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Siân
Last name	Munson
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	I'd prefer a quicker exit to pokie machines. They're a scourge on our society usually played by people who cannot afford to lose money. Get rid of them all.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	We should not be allowing anyone to move with pokie machines. If they're closing and moving they go without the pokies.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	The sooner we get rid of pokies the better
Supporting information	

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Robert
Last name	van Bentum
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	This type of gambling is disproportionately responsible for problem gambling
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	



### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Ruth
Last name	Bucknell
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	Definitely no more gambling venues wanted.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Great to see the council standing up to improve our city by reducing the possibility of increased gambling adfiction
Supporting information	

## Draft Gambling Policies 2023 Submission

Your contact details	
First name	Barbara
Last name	Taniyama
Organisation you represent	Yatai Restaurant
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	Three main reasons. 1. The obvious results of gambling addiction that destroys many families, 2. To support gambling addictions some revert to stealing ( I have been the victim of this. We are unsure of the exact total but it was a lot) and 3, the unfair advantage it creates in the food industry, businesses with pokie machine money to back them up, can offer ridiculously cheap bar meals that other food providers could not possibly match without going bankrupt.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Alex
Last name	Westwood
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Julie
Last name	Bunnell
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Sensible and timely change
Supporting information	

### Draft Gambling Policies 2023 Submission

Your contact details	
First name	Niki
Last name	Burtenshaw
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Draft Gambling Policies 2023 Submission

Your contact details	
First name	Andrew
Last name	Brooke
Organisation you represent	Palmerston North Police
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	Problem gambling has been an issue for a long time. The ready access to gambling machines has had a detrimental effect on families, particularly low-income families. The issues associated with financial stress often increases episodes of Family Harm in households. Limitations of the number and access of gaming machines will go some way to help reduce these episodes.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## 17-1



**Air Rescue  
and Community  
Services**

Draft Gambling Policies 2023 Submissions  
Palmerston North City Council

Email: [submission@pncc.govt.nz](mailto:submission@pncc.govt.nz)

**Draft Gambling Policies 2023 - Palmerston North City Council Gambling Venue  
Policy Review – Air Rescue Submission**

Introduction

Air Rescue Services Limited (Air Rescue) has one gaming venue in Palmerston North City: Sportsman's Bar, 217-223 Featherston Street, Palmerston North.

Air Rescue opposes the further restriction of the relocation policy. The relocation policy should be expanded to enable Council to consider relocations in any circumstances when the venue is moving to a lower deprivation area, or moving out of a residential area.

Air Rescue strongly opposes the introduction of a sinking lid policy. The current cap is working well and strikes a fair and reasonable balance.

Gaming Machine Relocation

The proposed policy will only allow Council to consider relocation applications if, due to circumstances beyond the control of the operator, the premises cannot continue to operate at the existing location. The proposal is that the circumstances must be deemed by Council to be exceptional.

Council has misunderstood the intention of the relocation provision in the Gambling Act. Relocations were not introduced for the sole purpose of enabling venues to move following a natural disaster or public works acquisition. Parliament's intention was to facilitate the movement of venues out of high deprivation areas to lower deprivation areas, and out of residential areas into central business districts.

A relocation policy that enables venues to move out of a high deprivation area (for any reason) would be appropriate for Palmerston North, as 18 of the 21 venues are currently in very high deprivation areas.

A relocation policy that enables venues to move out of a residential area to a central business district (for any reason) would also be appropriate for Palmerston North, as the social impact report notes that half of the existing gaming venues are located in "suburbs or villages".

Why should venues have to wait for a natural disaster or forced closure to move their gambling machines to a location that is more desirable from a harm minimisation perspective?

## 17-2

The proposed relocation provision also does not allow venues to move out of buildings deemed earthquake-prone, to new or refurbished premises. It is not uncommon for venues to want to move out of earthquake-prone buildings to provide a safer environment for their staff and customers. The relocation policy should allow venues to relocate to a newer, stronger building.

If a venue operator wished to invest in their business by moving to new premises and undertaking a new, modern fitout, such a move should be permitted. Having new, vibrant hospitality businesses is good for the city as it provides attractive and inviting premises for social interaction, encourages tourism, and creates employment.

If a venue is subject to a number of armed robberies or has regular social disturbances that require police intervention, the venue operator should be free to move to a new site, and to provide a different offering (such as a venue that is more focused on food sales). Enabling a venue to move and take its machines in such circumstances will facilitate and encourage such moves. This will reduce the number of robberies and social disturbances.

### Grant Funding is Extremely Valuable

In 2021, grants totalling \$5,217,283.00 were made to Palmerston North-based community groups.

Gaming venues enable extremely valuable funding to be provided to a large range of local community groups. Gaming societies are the only gambling operators that focus on supporting grassroots community organisations.

No other gambling provider provides this level of support for grassroots organisations. The Lottery Grants Board makes a small number of large grants to large organisations. TAB New Zealand predominantly 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.

There is no alternative funding available. Council is not in a position to provide millions of dollars in additional community grants. It is also unrealistic to think that grassroots organisations could obtain multi-million-dollar central Government or commercial sponsorship each year.

In 2012, Auckland Council commissioned a community funding survey. The survey data is summarised in the report *Community Funding: A Focus on Gaming Grants*.<sup>1</sup> 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 were:

- Most respondents (75%) indicated that their organisation was 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

<sup>1</sup> [www.gamblinglaw.co.nz/download/Research/Auckland\\_City\\_Community\\_Funding\\_Report.pdf](http://www.gamblinglaw.co.nz/download/Research/Auckland_City_Community_Funding_Report.pdf)





### 17-3

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 funding was not available.

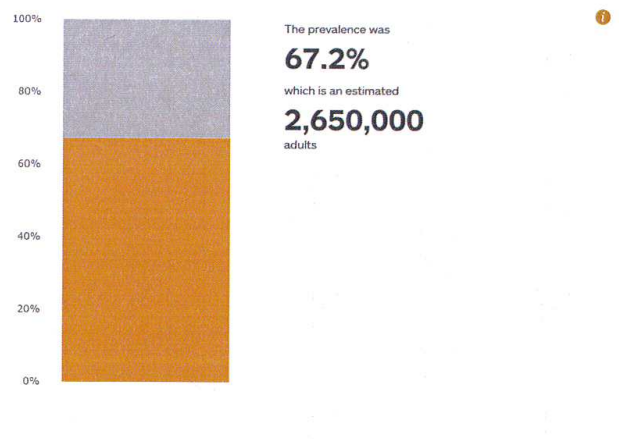
The report concluded:

Gaming Trust funding is a major source of community funding for organisations in the Auckland Region. Most respondents believe that the funding for their organisations is not particularly secure and are highly dependent on gaming funding, not just for discretionary or extra activities, but to fund their core business. There is a dependence on this funding with over half the respondents believing that their organisations would be at extreme risk if they did not receive it. Most felt that if the funding was not available, they would struggle to find an alternative source of funding. Some would cut down the activities they undertook, others say they would be forced to close down.

#### Entertainment

Gambling is a popular form of entertainment that most New Zealanders participate in. The 2018 Health and Lifestyles Survey<sup>2</sup> found that 67.2% of adult New Zealanders had participated in some form of gambling in the previous 12 months (estimated to be 2,650,000 adults).

#### 2018 Health and Lifestyles Survey



It is only a small percentage of the adult population (0.2%) that suffers harm because of excessive gambling.

#### Employment

Gaming machines create employment. Hospitality staff are employed to monitor and supervise the gaming machine players. Service technicians are employed to service

<sup>2</sup>

<https://kupe.hpa.org.nz/#!/gambling/gambling-participation/any-gambling-activities>



## 17-4

and repair the machines. The gaming societies that own the machines employ staff to review and process the grant applications.

A survey undertaken in 2009 estimated that there were 300 full-time equivalents directly employed by gaming societies and 215 employees of external service providers and contractors also working for these societies.<sup>3</sup>

#### Positive Economic Impact from the Gaming Industry

In 2012, Auckland City Council commissioned an economic impact report on the impact of the non-casino gaming machine industry. The Economic Impact Report<sup>4</sup> confirmed that the industry makes a positive economic contribution. The report concluded:

Overall, the non-casino gaming machine industry has a positive economic impact on the Auckland economy.

#### Positive Wellbeing Impact from Gambling in New Zealand

The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis<sup>5</sup>, found that gambling in New Zealand had a net positive wellbeing benefit of between \$1.74b and \$2.16b per annum. The costs and benefits are summarised in the following two tables, which can be found on pages 87 and 88 of the report:

**Table 32: Quantifiable costs and benefits of gambling in New Zealand, p.a., \$ million,**

	Gross benefits	Costs	Net benefits
Consumption-side	2,740 to 3,160	2,090	650 to 1,070
Production-side	1,800	990	810
Government	280	-	280
Total	4,820 to 5,240	3,080	1,740 to 2,160

**Table 33: Non-quantifiable costs and benefits of gambling in New Zealand**

Benefits	Costs
Wellbeing benefits from increased sports funding	Gambling harm-related costs, including:
Wellbeing benefits from increased arts funding	– Health costs
Wellbeing adjustment costs avoided	– Relationship costs
	– Work/study costs
	– Culture-related costs
	– Crime-related costs

3 KPMG and Ministry of Health (2013): Gambling Resource for Local Government. Wellington: Ministry of Health, [https://www.gamblinglaw.co.nz/download/Ministry\\_of\\_Health\\_-\\_KPMG\\_-\\_Gambling\\_Resource\\_for\\_Local\\_Government\\_2013.pdf](https://www.gamblinglaw.co.nz/download/Ministry_of_Health_-_KPMG_-_Gambling_Resource_for_Local_Government_2013.pdf)

4 [www.gamblinglaw.co.nz/download/Research/Auckland\\_City\\_Economic\\_Impacts\\_Report.pdf](https://www.gamblinglaw.co.nz/download/Research/Auckland_City_Economic_Impacts_Report.pdf)

5 [https://www.gamblinglaw.co.nz/download/Gambling\\_in\\_New\\_Zealand.pdf](https://www.gamblinglaw.co.nz/download/Gambling_in_New_Zealand.pdf)



**Air Rescue  
and Community  
Services**

## 17-5

### Machine Numbers and Gambling Harm

There may be a temptation to retain the current restrictive cap in an attempt to reduce gambling-related harm. Over the last 10 years, gaming machine numbers have reduced by 25%, but the problem gambling rate has plateaued. Limiting machine numbers has been tried as a tool to address gambling-related harm: it has not worked.

Reducing machine numbers merely reduces community funding, and accelerates the migration of gambling to commercial casinos and online providers.

### Increase in Internet and Mobile Phone Gambling

The adoption of a more restrictive policy is unlikely to reduce problem gambling but will result in the existing gambling moving from physical venues to the internet. It is now possible to play all the gaming machine games that are located at the existing venues via phones or tablets.



Online gambling is undesirable as:

- No funds are generated for local community grants.
- No tax revenue is generated for the New Zealand Government.
- No funding is provided to the problem gambling treatment services, i.e., no problem gambling levy is paid.
- No local employment is created.
- All bets are made on credit.
- It is highly accessible (you can play from the privacy of your own bedroom, 24 hours a day, 365 days a year).
- It has a high speed of play.
- There are no bet size restrictions.
- There are no venue staff to provide supervision, advice, and support.
- It is easily abused by minors.



## 17-6

- There is no guaranteed return to players.
- Excessive gambling is encouraged by the frequent use of inducements to gamble, such as player rebates and bonuses.

A spike in online gambling was recently experienced when our physical venues were closed due to the Covid-19 lockdown. The Salvation Army has publicly spoken out about the rise in online gambling during the nationwide lockdown.

In the Radio New Zealand article dated 4 April 2020<sup>6</sup>, the Salvation Army commented as follows:

**Covid-19: Salvation Army worries about rise in online gambling sites**

The Salvation Army's gambling addiction support service is worried about the increased number of online gambling sites.



The head of the organisation's gambling services division, Oasis, said it had been noticeable since the nationwide lockdown came into force.

**Lisa Campbell said the rise in the number of unregulated overseas online gambling websites had coincided with the closure of pokie venues and casinos, and online availability of New Zealand Lotto and TAB services.**

Online gambling companies were now advertising on social media, possibly because they saw people in isolation as a captive audience, Campbell said.

The ads for overseas gambling websites were cropping up frequently when she was on Facebook in a private capacity, she said.

She was concerned that the tailored nature of how social media advertising worked, meant that others, including at-risk gamblers, were getting the same ads.

"I'm concerned they're using this opportunity to bring people into online

<sup>6</sup> <https://www.nz.co.nz/news/national/413430/covid-19-salvation-army-worries-about-rise-in-online-gambling-sites>



**17-7**

gambling now, which is pretty awful to see that happening.

"I am sure they see social isolation as a great opportunity to expand business without any thought for the additional harm this could cause, further exacerbating the financial and mental harm on people already."

Oasis was now compiling information on online blocking tools that people can use to block internet gambling sites, Campbell said.

"We have heard from some clients who say they are really concerned about how they will cope, both financially and practically, at home with family or alone during the lockdown period, and are feeling very anxious, and some have asked for more support than normal."

Campbell said similar advertising was apparent before the lockdown but she was now seeing it more frequently.

Lotto and TAB were the only legal online providers of gambling, she said.

"They have said they're stopping advertising around the scratchies and other products during this time, so they're only advertising Lotto.

"The bigger concern is the overseas gambling websites where there's no regulation, which are potentially the biggest problem for us."

Oral Hearing

I do not wish to speak at the oral hearing. I ask that council has regard to my written submission.

  
Barry Steans  
Managing Director  
027 433 5453  
Barry.Steans@arcs.co.nz

13 June 2023



**Air Rescue**  
and Community  
Services

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Sam
Last name	Row
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	This is an excellent proposal.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	Venues should not be allowed to move. This goes against the sinking lid policy.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Gambling is only detrimental to a community. This includes Lotto. Lotto advertising should be banned.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Chrissy
Last name	Severinsen
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Quentin
Last name	McCarthy
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	



## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Gillian
Last name	Evans
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	It's a good and very much needed start.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Cheralyn
Last name	Sorrell
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Mariana
Last name	Bishop
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Dianne
Last name	Eales
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	Gambling and in particular pokie machines are reflected in the poverty numbers of our population. Adults in the lower socio economic groups tend to gamble on gaming machines to try and improve their situation. This of course has the opposite effect.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	I congratulate the PN City Council on their sinking lid policy draft submission.  I do hope this is successful in being adopted.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Wayne
Last name	Shewell
Organisation you represent	Myself
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

### Submission on Draft Gambling Policies 2023

Your contact details	
First name	Anthony
Last name	Jex
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I oppose this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

### Submission on Draft Gambling Policies 2023

Your contact details	
First name	Diana
Last name	Keith
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	John
Last name	McGifford
Organisation you represent	Central Football
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	Funding from approved gaming activities is paramount to the sustainability and growth of amateur sport. A reduction in funding, which a sinking lid could create, will have a detrimental impact on such sport and as a consequence an impact on the health and well-being of individuals and our communities, physically, mentally and socially.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	No comment, other than clarity for the user is not only helpful but critical.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	No comment.
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	No further comment.
Supporting information	



## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Katie
Last name	Cronin
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	This is a fantastic idea and support it
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	I would hope that there would be more restrictions on where there new location is and operating.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Jenifer
Last name	Mark
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	No information here on when would be granted so can't comment
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	Don't know existing TAB Venue Policy so can't comment.
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	I support any reduction in gambling opportunities including cessation of horse & greyhound racing. Unsure of PNCC's jurisdiction over Awapuni Raceway but lol forward to it no longer being used for the above purposes.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Jean
Last name	Archer
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Steve
Last name	Rumney
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Gambling if this nature promotes dishonesty and harmfulness to families and the public in general
Supporting information	

### Submission on Draft Gambling Policies 2023

Your contact details	
First name	Jonathan
Last name	Michael
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	Pokie machines are made to prey on those who are less financially stable, they should be banned altogether
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I oppose this
Comments:	I think you should crack down on TAB as well
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

### Submission on Draft Gambling Policies 2023

Your contact details	
First name	Dean
Last name	Luoni
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

35-1

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Mike
Last name	Ryan
Organisation you represent	Basketball Manawatu Incorporated
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	<p>Looking at the venues in Palmerston North we believe there has been a large drop off in their use of "Pokie Machines". A Lot of the people now play the "online" games, some of which are not classed Technically as gambling, but operate in the same way, offering an ability to "purchase or invest" in futures that can "win" benefits or abilities that can be traded for real time monetary gain. Which is therefore a type of gambling.</p> <p>However these new products that are being offered as "entertainment" are not treated the same as pokie machines. A lot of the new "Childrens and fantasy" games fall into this criteria.</p> <p>We as a community organisation would not last in our present state if gaming machines were reduced beyond the levels they presently are. If the data gained whilst the country was in lock down due to covid was utilised, we believe it would show a clearer picture of where the true effect of physical gambling machines within venues and facilities on the general public and the "harm" it may or may not cause. Compare this to online "entertainment games" or "online gambling" revenue and a disproportionate picture reveals itself of where the true harm is by the young and vulnerable.</p> <p>So we I do not believe the council should reduce its limits on the number of gaming machines within its boundaries or restrict new premises from applying to be allowed to install machines, as this is not as large a problem now as once thought, and a lot of the non-vulnerable enjoy "gambling" as a form of entertainment.</p>
Class 4 Gambling Venues Policy: Relocating existing venues	

## 35-2

We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	See previous comments
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	<p>As a community organisation providing a service/programme to our community we would not be able to operate if the number of gaming machines were reduced beyond the levels. Covid gave us a great insight into just how many community organisations are reliant on "pokie machine" funding and the flow on effect of not having this revenue stream available to them.</p> <p>While it must be accepted that the council is expected to make decisions based on the needs of the community, and in this case of how many machines are locate in any one part of the community, and so by default do not want to be seen to endorse gambling; from a community perspective, the funds generated are used to support projects and initiatives that benefits the wider community, whether it be sport, arts or cultural projects/activities.</p> <p>People currently gamble from their homes, both on the internet and through TAB phone accounts and as such it would be extremely difficult for the government to dictate what people do in their own homes. The question around protecting problem gamblers will continue until online betting opportunities are vetted in some way, shape or form.</p> <p>That's why we believe the current policy for online gambling is not fit for purpose. Online gambling, is without any controls and is totally unsupervised, particularly with the continuing emergence and prominence of offshore, online betting opportunities.</p>
Supporting information	



36-1

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Robert
Last name	Holdaway
Organisation you represent	National Public Health Service (MidCentral) - Te Whatu Ora
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	Yes
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	We support the sinking lid but we are suggesting a couple of additional amendments to strengthen the policy around reducing health inequities.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	See above - this is one area we have some thoughts around.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

04 July 2023

36-2

**Te Whatu Ora**  
 Health New Zealand

## Palmerston North City Council Gambling Policies Review

**To: Palmerston North City Council**

**This is a Submission by: Public Health Services, MidCentral, Te Whatu Ora | Health New Zealand**

1. Public Health Services, Te Pae Hauora o Ruahine o Tararua | MidCentral is part of the National Public Health Service, which in turn is part of Te Whatu Ora | Health New Zealand, an entity established under s 11 of the Pae Ora (Healthy Futures) Act 2022. It has statutory obligations for public health under the Pae Ora (Healthy Futures) Act 2022, the Health Act 1956 and various other pieces of legislation.
2. The National Public Health Service is required to promote health and prevent, reduce, and delay ill-health, including by collaborating with other agencies, organisations, and individuals to address the determinants of health. The notified planning process includes matters with the potential to impact on the health of people and communities.
3. Public Health Services, MidCentral support Palmerston North City Council (PNCC) prioritising the wellbeing the communities in their city.
4. The vision of Te Whatu Ora for our urban environments is that they are places in which communities can be healthy, safe and resilient. Healthy and resilient communities rely on built environments that are accessible and safe for everyone. 'Everyone' includes Māori, Pacific peoples and all other ethnicities, women, children, parents and caregivers, older people and people with disabilities.
5. The amendments to the PNCC Gambling Policy seek to place a sinking lid in the number of class 4 gaming machines (non-casino gaming machines) and venues in the city and other minor administrative changes.
6. This submitter supports these policy amendments. Refer to the attached schedule for the reasons.

This submitter wishes to be heard in support of this submission.

Date **4** day of **July** **2023**.

Paula Snowden  
 Regional Director, Central Region,  
 National Public Health Service



Signed \_\_\_\_\_

**Address for service:** National Public Health Service | MidCentral Private Bag 11036 PALMERSTON NORTH 4442

**Contact person:** Dr Robert Holdaway

**Email:** PublicHealthops@midcentraldhb.govt.nz

**Telephone:** 06-3509110

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**Public Health Service** | Private Bag 11036, Manawātū Mail Centre, Palmerston North 4442 **Phone:** 06 350 9110

**Te Whatu Ora – Health New Zealand**  
**Te Pae Hauora o Ruahine o Tararua | MidCentral**

**Te Kāwanatanga o Aotearoa**  
 New Zealand Government

36-3

## SCHEDULE OF SUBMISSIONS BY

**Te Whatu Ora**  
 Health New Zealand

Public Health Services, Te Pae Hauora o Ruahine o Tararua | MidCentral

## 1. Submission

<b>Submission relates to this specific part of proposal</b>	PNCC Gambling Policies Review
<p>Regarding this part, In general we support the PNCC proposal to amend the Gambling Policies and congratulate PNCC on their sinking lid proposal on both venues and machines.</p> <p>Harmful effects of gambling occur for individuals, whanau and community. For example, problem gambling is strongly correlated with family, whanau and partner violence. Children are exposed to considerable gambling messaging resulting in normalisation of problem gambling behaviour. Broader societal issues arise as a result of the large amount of expenditure going in to gambling. Research suggests if current levels of expenditure on gambling machines was switched to retail spending for example, large numbers of jobs could be created.</p> <p>Total gambling expenditure (player losses) in 2020/21 was \$2.624 billion for non-casino gaming machines (NCGMs), Lotto NZ, TAB NZ and casinos combined across New Zealand. This is the highest-ever recorded annual total. Likewise, national expenditure on NCGMs reached an all-time high in 2020/21 of \$987 million – the highest since records began in 2007.</p> <p>The Health and Lifestyles survey in 2020 noted gaming machines at a pub or club (NCGMs) were a popular form of gambling. The survey also noted that the most harmful form of gambling in New Zealand is also NCGMs (known colloquially as "pokies") at pubs/clubs (defined in the Act as class 4 gambling). The survey showed that 50.3 percent of those who played NCGMs in pubs or clubs at least once a month experienced some level of gambling harm.</p> <p>The gaming machine proceeds for machines in Palmerston for the December 2022 quarter was \$5,976,974. Proceeds per gaming machine in Palmerston North were higher than proceeds per total number of gaming machines in New Zealand as a whole between 2020 and 2022. This means that, while the number of machines in the city has been declining the annual proceeds from each machine have not decreased in line with New Zealand as a whole. Players are spending longer hours playing gaming machines, betting more per game or more players are playing pokie machines.</p> <p>Spending on gambling, especially Class 4 gaming machines, is not spread evenly across our communities. Within Palmerston North, 19 of the 21 venues are located in very high deprivation areas. Nationally, around one quarter of class four venues are located in very high deprivation areas. While it is possible that people may gamble outside their neighbourhoods, there are significant associations between gambling behaviour and neighbourhood access to gambling venues. Problem gambling is also significantly associated with living closer to a gambling venue.</p> <p>After adjusting for deprivation level, the 2020 Health and Lifestyle Survey found Māori were over 3.39 times more likely to report either gambling-related arguments or money problems related to gambling compared with non-Māori and non-Pacific peoples. Pacific peoples were 2.67 times more likely to report these harms than non-Pacific peoples and non-Māori.</p>	

Public Health Service | Private Bag 11036, Manawatū Mail Centre, Palmerston North 4442 Phone: 06 350 9110

**Te Whatu Ora – Health New Zealand**  
 Te Pae Hauora o Ruahine o Tararua | MidCentral

**Te Kāwanatanga o Aotearoa**  
 New Zealand Government

36-4

**Te Whatu Ora**  
 Health New Zealand

Equity, as one of the principles of Te Tiriti o Waitangi, requires the Crown to commit to achieving equitable outcomes for Māori. To honour this commitment, the Crown must address and eliminate the inequities in the determinants of health and wellbeing for iwi, hapū, whānau and Māori communities.

In the New Zealand context, the population groups more likely to experience inequitable health outcomes include Māori, Pacific peoples, communities with lower socioeconomic status and marginalised groups. Māori and Pacific peoples are more likely to be affected by gambling harm than any other group. They are also more likely to have other risk factors for gambling harm, such as low incomes and living in low socioeconomic communities where some forms of gambling, particularly NCGMs, are more accessible.

Te Pae Tata (the Te Whatu Ora Interim Health Plan) places whānau at the heart of the system to improve equity and outcomes and Pae Ora, better health in our communities. Public Health Services, MidCentral thank PNCC for putting whānau first by proposing a sinking lid on both class 4 gambling venues and class 4 gambling machines.

We thank PNCC for proposing extra clarity regarding relocating to new premises and note the need for exceptional circumstances and a complete inability to continue to operate at the existing location for relocation to be considered. It is noted that some councils have limited relocations to defined areas as well as only being allowed in the context of various form of disasters. A further option for Council is to choose to not allow relocations.

A further aspect of a sinking lid policy could also be considered: namely “no mergers” (ie the number of class 4 gaming machines can only be the existing total for one venue and not the sum of both venues if a merger is taking place).

Public Health Services, MidCentral believe that the proposed changes to the PNCC Gambling Venue Policy for Class 4 Gaming machines represents a good start to Te Whatu Ora’s equity principle of Pae Ora, better health in our communities.

Public Health Services, MidCentral would like to recommend the addition of the following 2 provisions to the PNCC Gambling Venue Policy;

1. PNCC also considers either limiting relocations to defined areas (eg based on deprivation) or not allowing relocations at all.
2. When clubs merge, the number of class 4 gaming machines can only be the existing total for one venue and not the sum of both venues.

#### References:

Gambling in Palmerston North: An assessment of the social impacts of gambling to inform the Palmerston North City Council’s review of gambling policies, May 2023

Strategy to prevent and minimise gambling harm 2022/23 to 2024/25

Te Hīringa Hauora and Kupe. 2020. Health and Lifestyles Survey Gambling Harm. URL: [https://kupe.hpa.org.nz/#!/ gambling/gambling-harm](https://kupe.hpa.org.nz/#!/gambling/gambling-harm)

**Public Health Service** | Private Bag 11036, Manawātū Mail Centre, Palmerston North 4442 **Phone:** 06 350 9110

**Te Whatu Ora – Health New Zealand**  
**Te Pae Hauora o Ruahine o Tararua | MidCentral**

**Te Kāwanatanga o Aotearoa**  
 New Zealand Government

37-1

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Jake
Last name	Inwood
Organisation you represent	Hockey Manawatu
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	<p>The proposal to introduce a "sinking lid" was discussed at the Board meeting on the 28th June 2023. While Hockey Manawatu support this proposal, it should be noted that Class 4 Gambling funds contribute significantly to the sport sector, with over \$13million invested in sport in the Manawatu-Wanganui region over the last 2 years.</p> <p>A reduction in funding availability will inevitably put the costs back on to individual sports. While we, as hockey, are exploring alternative funding models there will potentially still be a short fall, and this will have to be passed on to the user.</p> <p>What support will PNCC be exploring to cover any potential shortfall for the sport sector and ensure the sport remains affordable for our community?</p>
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	

37-2

Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Lachlan
Last name	Wingfield-Smith
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Colleen
Last name	Maxwell
Organisation you represent	Masonic Hotel
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	Yes
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	



40-1



**Submission for  
Palmerston North City Council  
on the current review of the  
Class 4 Gambling Venues Policy**

**July 10, 2023**



Palmerston North City council, Grant #84854  
\$65,000 for the Splash Pad at Memorial Park

## 40-2

### New Zealand Community Trust's submission on Palmerston North City Council's Gambling Venue Policy

#### Introduction

Established in 1998, New Zealand Community Trust (NZCT) is one of New Zealand's largest gaming trusts with 13% market share. Our publicans raise funds by operating gaming lounges within their pubs, hotels and other venues. In the 12 months to 30 September 2022, NZCT approved **\$39.2** million distributed in grant funding to sporting, local government and community groups nationwide.

#### Gaming machine funding

The Gambling Act 2003 seeks to balance the potential harm from gambling against the benefits of using gaming machines as a mechanism for community fundraising.

NZCT provided to Palmerston North City Council for the direct benefit of the community from Oct 2019 to May 2023 a total of **\$1,303,821** across **113** worthy grants. NZCT during the same period approved multi regional grants that benefit Palmerston North of **\$1,015,343** and National Grants that benefit Palmerston North of **\$105,303** - an overall total of **\$2,424,468**.

A list of all the grants made during this time are attached as appendix 1.

NZCT's contribution to community funding reflects its venue numbers and the turnover of each of those venues.

Maintaining the cap of machines across Palmy and the broad relocation policy will ensure these millions of dollars continue to be granted to the local community.

The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis, found that gambling in New Zealand had a net positive wellbeing benefit of between **\$1,740** million and **\$2,160** million each year.

New Zealand has a very low problem gambling rate by international standards – at 0.2% of people aged 18 and over (approximately 8000 people nationally). According to the New Zealand National Gambling Study: Wave 4 (2015).

Council gambling venue policies are critical to maintaining the infrastructure that allows community funding from gaming trusts to be sustainable long term. Sinking lid and no-relocation policies destroy this infrastructure. Councils need to take an informed and balanced approach to community benefit and potential harm from gambling.

All gaming machine societies contribute to a problem gambling fund – which provides some \$20 million per year to the Ministry of Health to support and treat gambling addiction.

Problem gamblers are currently supported using a range of measures. The controlled, class 4 environment is the one of the best environments to reduce gambling harm to people and communities.

Information is freely available in the community to enable support and identify risks associated with gambling by members of the public, individuals at risk, staff at venues, and by loved ones.

### 40-3

Where a sinking lid is used it is a blunt instrument that does little to address problem gambling and reduces community funding by removing the fundraising infrastructure (i.e., gaming machines within tightly controlled entertainment venues) over time. Problem gambling is a complex addiction.

A cap on gaming machine numbers and an effective broader relocation policy to include where landlords are imposing unreasonable terms and that allows venues to move out of deprived areas is much fairer to the community and hospitality business owners, as well as helping address problem gambling.

If gaming venues are removed from the community, gamblers are more likely to move to the online environment where gambling is unregulated, unmonitored, and have no harm minimisation measures. Online gambling incentivises spending and returns nothing to benefit the New Zealand community. The controlled environment around class 4 is recognized as one of the safest places in which to enjoy gambling, whilst providing benefit back to the community.

In addition to contributing some \$1 million each year to the problem gambling levy, NZCT contributes an estimated \$800,000 each year, to resources and initiatives that help minimise harm.

Class 4 societies must distribute or apply 100% of profits to community authorised purposes. It's important to appreciate this a not-for-profit model.

### Keep the district cap and continue to allow relocation

- It is recommended a total cap of machines remain and retain the relocation provision across the district to enable venues to move to new, modern premises. This also allows venues to move if landlords impose unreasonable terms and in the event of natural disaster or circumstances beyond the venue operators' control, or the lease expires.

In September 2013, Parliament recognised the merit in enabling venues to relocate, and expressly amended the Gambling Act 2003 to enable venues to relocate and retain the same number of machines when a relocation consent was obtained.

Venue relocation is a harm minimisation tool. Venue relocation allows venues to move out of a suburban/residential area to a more suitable area; the CBD. There is no good policy reason for taking steps to remove this option. Removing the option to relocate simply entrenches venues in undesirable residential locations.

Enabling relocation permits venues to re-establish after a natural disaster or fire as the current policy allows.

Enabling relocation enables venues to move out of earthquake-prone buildings, an important Health and Safety consideration.

The relocation policy is positive as it assists with the revitalisation of the area. It allows gaming venues to move to new, modern, refurbished premises. Allowing local businesses to upgrade their premises and provide a more modern, attractive offering.

### The national picture - community organisations rely on pub gaming to survive

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

## 40-4

Seventy-five percent of groups surveyed in 2012 indicated their organisation is moderately or totally reliant on gaming funding to support their core business. Fifty-five percent said there would be a high to extreme risk to their organisation and their core business if they did not receive this funding.<sup>1</sup> There is no evidence that this situation has changed for the better since then.

The reduction in gaming trust funding has had a negative impact on community organisations, with many organisations and activities ceasing to operate and others severely reduced in capacity and capability. Grassroots community organisations are struggling with few alternative sources for funding available to replace the loss of gaming funding. Voluntary organisations are increasingly reliant on nationwide public donation campaigns to stay afloat. The Covid-19 pandemic has only worsened this situation.

### Locally in Palmy

Palmerston North organisations like these that have benefited from NZCT's grants since October 2019 would miss out in the future if less funding is available.

Organisation	Amount Approved
Arohanui Hospice Service Trust	\$20,000.00
Arohanui Hospice Service Trust	\$5,000.00
Ashhurst Bowling Club Inc	\$2,840.00
Ashhurst Bowling Club Inc	\$2,410.00
Ashhurst Pohangina Rugby Football Club Inc	\$6,360.00
Ashhurst School	\$11,040.00
Ashhurst School	\$3,481.58
Awapuni School Palmerston North	\$16,500.00
Awapuni School Palmerston North	\$5,000.00
B12 Sports Inc	\$3,255.00
Bowls Palmerston North Inc	\$4,584.82
Bunnythorpe Rugby Football Club Inc	\$5,451.76
Camellia House Trust	\$10,000.00
Cancer Society of NZ Manawatu Centre Inc	\$15,000.00
Celtic Spirit Inc	\$5,000.00
Central Region Tournament Water Ski Association of NZ Inc	\$5,387.20
College Old Boys Rugby Football Club Inc	\$8,411.20
College Old Boys Rugby Football Club Inc	\$8,018.78
College Old Boys Rugby Football Club Inc	\$1,500.00
College Old Boys Rugby Football Club Inc	\$10,000.00
Freyberg Cricket Club Inc	\$2,459.99
Freyberg Cricket Club Inc	\$1,947.99
Freyberg Cricket Club Inc	\$1,540.00

<sup>1</sup> Page iii, Community Funding Survey, Point Research 2012.

**40-5**

Freyberg Cricket Club Inc	\$2,304.00
Freyberg High School	\$15,000.00
Freyberg High School	\$9,561.76
Freyberg Old Boys Rugby Football Club Inc	\$8,995.09
Freyberg Old Boys Rugby Football Club Inc	\$10,652.50
Freyberg Old Boys Rugby Football Club Inc	\$9,205.00
High School Hockey Club PN Inc	\$8,780.00
High School Hockey Club PN Inc	\$5,766.00
Ice Breaker Aquatics Inc	\$1,500.00
Kairanga School	\$1,200.00
Kopane School	\$2,415.00
Linton Camp Golf Club Inc	\$3,911.70
Lions Club of Middle Districts Inc	\$40,000.00
Manawatu Access Radio Charitable Trust	\$5,442.87
Manawatu Freshwater Anglers Club Inc	\$4,330.00
Manawatu Freshwater Anglers Club Inc	\$4,000.00
Manawatu Freshwater Anglers Club Inc	\$2,500.00
Manawatu Gymsports Inc	\$9,190.00
Manawatu Gymsports Inc	\$15,799.40
Manawatu Mountain Bike Club Inc	\$20,000.00
Manawatu Mountain Bike Club Inc	\$30,000.00
Manawatu Scottish Pipe Band Inc	\$3,535.00
Manawatu Skating Club Inc	\$3,000.00
Marist Club PN Inc	\$47,930.87
Marist Club PN Inc	\$23,674.50
Marist Club PN Inc	\$50,000.00
Marist Club PN Inc	\$23,296.09
Marist Club PN Inc	\$58,038.74
Marist Club PN Inc	\$14,886.84
Marist Club PN Inc	\$7,500.00
Marist Club PN Inc	\$35,000.00
Marist Club PN Inc	\$19,571.27
Massey University Football Club Inc	\$16,000.00
Massey University Football Club Inc	\$15,000.00
Newbury School	\$20,000.00

**40-6**

Northern Club Manawatu Inc	\$30,000.00
Northern Club Manawatu Inc	\$10,000.00
Old Boys Cricket Club Palmerston North Inc	\$4,726.13
Old Boys Cricket Club Palmerston North Inc	\$3,444.99
Old Boys Cricket Club Palmerston North Inc	\$3,000.00
Old Boys Cricket Club Palmerston North Inc	\$3,000.00
Palmerston Cricket Club Inc	\$6,000.00
Palmerston Cricket Club Inc	\$6,078.00
Palmerston North Athletic & Harrier Club Inc	\$4,910.00
Palmerston North Athletic & Harrier Club Inc	\$5,557.38
Palmerston North Badminton Club Inc	\$2,875.00
Palmerston North Boys High School	\$5,043.48
Palmerston North Boys High School	\$10,713.00
Palmerston North Boys High School	\$6,000.00
Palmerston North Boys High School	\$6,000.00
Palmerston North Bridge Club Inc	\$2,802.00
Palmerston North City Council	\$65,000.00
Palmerston North Dance Association Inc	\$10,035.13
Palmerston North Dance Association Inc	\$9,352.00
Palmerston North Dance Association Inc	\$8,302.65
Palmerston North End Association Football Club Inc	\$9,732.00
Palmerston North Golf Club Inc	\$20,000.00
Palmerston North Squash Club Inc	\$40,000.00
Palmerston North Street Van Inc	\$20,000.00
Palmerston North Theatre Trust	\$7,377.00
Palmerston North Theatre Trust	\$2,525.00
Park Road Playcentre	\$8,300.00
Performing Arts Competitions Association of NZ Inc	\$15,000.00
Performing Arts Competitions Association of NZ Inc	\$30,066.65
Philippine Central Association Inc	\$20,000.00
Philippine Central Association Inc	\$20,000.00
PN Marist Football Club Inc	\$15,000.00
PN Marist Football Club Inc	\$15,000.00

## 40-7

PN Marist Football Club Inc	\$15,000.00
PN Marist Football Club Inc	\$15,000.00
Red Sox Sports Club Inc	\$7,500.00
Red Sox Sports Club Inc	\$7,500.00
Ross Intermediate School	\$7,230.00
Snapback Gym Inc	\$16,200.00
Special Olympics Manawatu	\$3,659.00
St James Catholic School	\$3,940.00
St Peters College Palmerston North	\$7,771.26
St Peters College Palmerston North	\$4,000.00
St Peters College Palmerston North	\$2,000.00
St Peters College Palmerston North	\$3,600.00
Swamp City Roller Rats Inc	\$4,000.00
Swamp City Roller Rats Inc	\$4,265.10
Takaro Association Football Club Inc	\$12,791.86
Takaro Association Football Club Inc	\$10,935.90
Takaro Association Football Club Inc	\$10,200.00
Takaro Sports Club Inc	\$3,200.00
Te Pae Poitarawhiti O Ikaroa Ki Te Raki	\$11,336.00
Te Pae Poitarawhiti O Ikaroa Ki Te Raki	\$20,000.00
Turitea School	\$1,960.00
Youthline Central North Island Inc	\$2,716.60
	<b>\$1,303,821.08</b>

While 90 cents of every dollar goes back to the person gambling, every year considerable funds are returned to the community by the non-club class 4 gambling sector. Refer 2020 grant distribution modelling by KPMG on behalf of DIA and industry, which analysed some \$294 million<sup>2</sup> of grants distributed to in 2019 to more than 9,700 worthwhile sports and community groups. The sector's contribution to the community through funding, in addition to the contribution to government revenue from GST, other taxes and levies, is acknowledged by central government.

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

#### The pub gaming sector has already experienced a significant decline

During the last 18 years the pub gaming sector has experienced a significant decline, yet problem gambling has remained static. Department of Internal Affairs (DIA) statistics show that, between 30 June 2003 and 31 December 2022:

- the number of gaming venues reduced from 2,122 to 1,028 (a 50% reduction)<sup>3</sup>

<sup>2</sup> Grant Distribution Modelling, KPMG, November 2020.

<sup>3</sup> DIA statistics: [https://www.dia.govt.nz/diawebsite.nsf/wpg\\_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict](https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict)

## 40-8

- the number of gaming machines operating reduced from 25,221 to 14,503 (a 41.7% reduction)<sup>4</sup>.

### **Council policies contribute to the decline in the pub gaming sector**

Sometimes the policies are based on the erroneous belief that limiting and or reducing gaming machine numbers will limit problem gambling. In fact, despite the 41% reduction in gaming machine numbers during the past 17 years, New Zealand's problem gambling rate has remained consistently low as a percentage of the population. The 2015 New Zealand Gambling Study (the most recent) found the rate was 0.2% and the latest Health and Lifestyles Survey found it was 0.1%. The 2012 New Zealand Gambling Study concluded "...there has probably been no change in the prevalence of current problem and moderate-risk gambling since 2006."<sup>5</sup>

### **Online gambling is the unregulated threat to watch out for**

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

During the Covid-19 lockdown in 2020, 8% of gamblers gambled online for the first time and an additional 12% gambled online more than usual.<sup>6</sup>

Offshore-based online gambling poses considerable risks because it:

- Is highly accessible, and is available 24 hours a day from the privacy of your home;
- Has no restrictions on bet sizes;
- Has no capacity for venue staff to observe and assist people in trouble;
- Reaches new groups of people who may be vulnerable to this online channel;
- Provides no guaranteed return to the person playing;
- Is more easily abused by under 18s;
- Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and is unregulated, so on-line gamblers can be encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer's account for each friend that they induce to open an account and deposit funds.

Offshore-based online gambling does not generate any community funding for New Zealanders, does not generate any tax revenue for the New Zealand Government, and does not make any contribution to the New Zealand health and treatment services as no contribution is made to the problem gambling levy<sup>6b</sup>.

### **Location of gaming machines is more important than their number**

Research<sup>7</sup> suggests that when it comes to preventing and minimising gambling harm, the location of gaming machines is more important than the number of gaming machines operating. The Government acknowledged this point in 2013 when it amended the Gambling Act<sup>8</sup> to require local authorities to consider adding relocation clauses to their gambling policies.

<sup>4</sup> Ibid.

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

<sup>6</sup> Impact on Covid-19: Topline results, April 17, 2020, Health Promotion Agency

<sup>7</sup> *Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland*, Gambling & Addictions Research Centre, AUT University, 2012.

<sup>8</sup> Section 97A and 102(5A).

<sup>6b</sup> [http://www.gamblinglaw.co.nz/download/Online\\_gambling\\_Cabinet\\_paper.pdf](http://www.gamblinglaw.co.nz/download/Online_gambling_Cabinet_paper.pdf)



## 40-9

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

### Helping reduce harm

Research<sup>9</sup> by Auckland University of Technology shows that problem gambling behaviour is influenced more by the distance to the nearest gambling venue, rather than the number of gambling venues within walking distance.

The Ministry of Health's 2013 Gambling Resource for Local Government acknowledges this point and states that one of the major factors associated with increased prevalence of problem gambling is "location and/or density of gambling venues and machines".<sup>10</sup> The Ministry of Health also found "being a problem gambler is significantly associated with living closer to gambling venues."<sup>11</sup> Allowing gaming operations to move out of high-deprivation areas could potentially diminish gambling harm for at-risk communities.

### Supporting local hospitality businesses

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

### Responding to future demand

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

The DIA recommended relocation policies as a way of allowing territorial authorities to future-proof their class 4 gambling policies.<sup>12</sup>

### Gaming machines can only be played in strictly controlled environments

Corporate societies licensed to conduct class 4 gambling are fully aware of their obligations under the Gambling Act 2003. All gaming rooms are operated by trained staff at licensed venues.

The DIA is responsible for monitoring the class 4 gambling industry, including venue 'key persons', bar staff and societies, to ensure they adhere to legislative requirements. The penalties for non-compliance include fines, suspensions, loss of operating or venue licence and potential criminal charges.

<sup>9</sup> *Brief Literature Review to Summarise the Social Impacts of Gaming Machines and TAB Gambling in Auckland*, Gambling & Addictions Research Centre, AUT University, 2012.

<sup>10</sup> Page 21, *Ministry of Health Gambling Resource for Local Government*, 2013.

<sup>11</sup> Ibid.

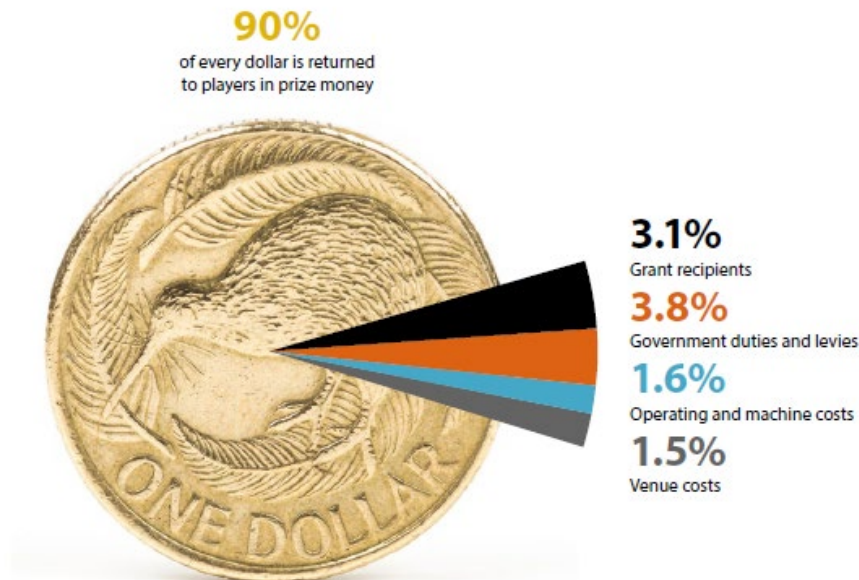
<sup>12</sup> *Internal Affairs Policy Briefing 3: Options for improving territorial authority gaming machine policies*, 28 March 2013.

## 40-10

### Pub gaming's vital support for the community

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

#### NZCT's revenue distribution in 2021/22



In the year ending 30 September 2022, NZCT distributed \$39.2 million through 1,442 grants.

NZCT provided to Palmerston North City Council for the direct benefit of the community from Oct 2019 to May 2023 a total of **\$1,303,821** across **113** worthy grants.

NZCT during the same period approved multi regional grants that benefit Palmerston North of **\$1,015,343** and National Grants that benefit Palmerston North of **\$105,303** - an overall total of **\$2,424,468**. (See appendix 1 for details).

Amateur sport has traditionally been our focus, yet we fund education, arts and health also. Between 75 and 80% of the grants we distribute go to sports organisations. Each year, NZCT funds around 50 different sports.

In 2021/22, we funded the equivalent of:

- uniforms for 49,998 rugby teams (one uniform costs \$60), or
- 2,999,867 footballs (one football costs \$15), or
- 5,625 four-person waka (one waka costs \$8,000), or
- more than 2.25 million hours – or 256.8 years – of coaching (one hour of coaching costs \$20), or
- 30 artificial playing fields (one field costs \$1.5 million).

## 40-11

To raise this much money themselves, our grant recipients would have had to:

- cook and sell more than 22.4 million \$2 sausages at sausage sizzles and every person in New Zealand would need to buy and eat five sausages, or
- sell five \$2 raffle tickets to every man, woman and child in New Zealand each year, or
- wash more than 8.9 million cars at \$5 a wash, which would take 10 people continuously washing cars for 30 minutes around 50 years to achieve.

Grants distributed by gaming machine trusts were 10% of the total philanthropic funding to the community and voluntary sector in 2011 and were at almost twice the level given by New Zealand businesses. In 2019, the amount of funds returned to the community from non-casino, non-club gaming grants was \$294 million.<sup>13</sup> Class 4 gaming societies are required to distribute a minimum return of 40% to the community, on top of government fees, levies and GST, site rental, and machine and operating costs (see the chart on the next page showing NZCT's revenue distribution for the 2018/19 reporting period).

Each year the gambling industry pays circa \$18 to \$20 million to the government, so the Ministry of Health can implement its Preventing and Minimising Gambling Harm Strategic Plan. These funds pay for the implementation of public health services, intervention services, research, evaluation and workforce development.

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

### Reasons to maintain the relocation policy on gaming machines and venues

Gaming machines are an important component of your local hospitality sector and an important source of community funding, and the benefits are considerable.

#### Local hospitality sector

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

#### Community funding

Around \$294 million is returned to the community every year through grants awarded by class 4 gaming societies. Many community organisations, such as sports clubs, hospices, rescue services and arts groups, would struggle or cease to function without this funding. There is currently no sustainable alternative to this funding to the level provided by gaming societies.

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

#### The benefits are considerable

Recent research in 2021 carried out independently by TBD who produced the TBD Advisory report, Gambling in New Zealand: A National Wellbeing Analysis<sup>8</sup>, found that gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.7 to \$2.1 billion per annum. The costs and benefits are summarised in table, which can be found on page 87 of the report (replicated below)<sup>7b</sup>

<sup>13</sup> Grant Distribution Modelling, KPMG, November 2020.

## 40-12

**Table 32: Quantifiable costs and benefits of gambling in New Zealand, p.a., \$ million,**

	Gross benefits	Costs	Net benefits
Consumption-side	2,740 to 3,160	2,090	650 to 1,070
Production-side	1,800	990	810
Government	280	-	280
Total	4,820 to 5,240	3,080	1,740 to 2,160

The report for the first time reliably indicates benefits, as well as costs and shows that this net benefit is provided each year throughout New Zealand.

### Gaming machine numbers have little effect on problem gambling numbers

It is naïve, misleading, and wrong to assume that fewer gaming machines will result in fewer problem gamblers. A gambling addiction is a complex psychological condition, which is influenced by many factors and usually has co-morbidities, such as mental health issues and other addictions. Evidence show that problem gambling rates have plateaued.

### Gaming machines are a legal and valid entertainment choice

Pub gaming is a legal, valid, and enjoyable source of entertainment for Hutt residents and tourists alike. Most players regard gaming as light entertainment and know when to stop. The Gambling Commission has reminded councils and the regulator that "... conditions can only properly be imposed if they reduce the harm caused by problem gambling, as distinct from simply reducing gambling activity which is a lawful and permitted activity under the Act."<sup>14</sup>

We recognise that Palmerston North Council aims, to balance the needs of visitors and residents while achieving a focus on wellbeing and economic development. If appropriate measures remain in place to support problem gambling, then funding structure should remain in the community for the good it will bring.

Pub gaming brings many benefits to New Zealand. Business and Economic Research Ltd (BERL)<sup>15</sup> calculated in 2015 that each year the entertainment value to recreational players was around \$250 million, the grants value to the community was also around \$250 million (now \$294 million), and the Government revenue value in the form of tax, duties and levies was around \$279 million.

### Problem gambling rates have plateaued

The New Zealand 2012 National Gambling Study found that the number of people who regularly participate in continuous forms of gambling, like gaming machines, decreased from 18% in 1991 to 6% in 2012.<sup>16</sup> The study concluded: "Problem gambling and related harms probably reduced significantly during the 1990s but have remained at about the same level despite reductions in non-casino EGM [electronic gaming machine] numbers and the expansion of regulatory, public health and treatment measures."<sup>17</sup>

The 2016 National Gambling Study (the most recent) found the problem gambling rate was 0.2% and concluded: "From 2012 to 2015, overall gambling participation has declined whilst problem gambling and low-risk and moderate-risk gambling levels have remained static. This poses a public

<sup>14</sup> Gambling Commission decision GC 03/07.

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

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

<sup>17</sup> Pg 18, *ibid*.

## 40-13

health challenge of identifying the factors to explain the persistence of harm despite declining gambling participation. One reason may be a high relapse rate [66%].”

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

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

### Problem gambling rates in New Zealand are relatively low

NZCT is committed to reducing and minimising the harm that can be caused by gambling. As can be seen in the table, New Zealand has one of the lowest rates of problem gambling in the world.<sup>19</sup> Relatively few New Zealanders are gambling at levels that lead to negative consequences; most people who gamble know when to stop.

Country	Problem gambling prevalence (% population*)
New Zealand	0.1–0.2
UK	0.7
Norway	0.7
Australia	2.3
USA	2.6
Canada	3
Mixture of CPGI, PGSI and SOGS scores <sup>20</sup>	

### Strict harm minimisation obligations

A key purpose of the Gambling Act is to prevent and minimise the harm that can be caused by gambling, including problem gambling. To that end, in all class 4 gambling venues:

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

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

<sup>19</sup> *Maximising the benefits to communities from New Zealand’s community gaming model*, BERL, February 2013.

<sup>20</sup> A range of different measurements are available to measure problem gambling rates. CPGI refers to the Canadian Problem Gambling Index, PGSI is the Problem Gambling Severity Index and SOGS is the South Oaks Gambling Screen.

## 40-14

### Ongoing obligations

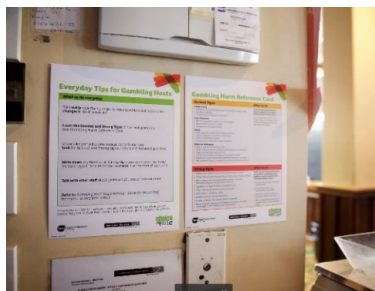
The Gambling Act obliges venue staff to provide ongoing help to a potential or current problem gambler. Offering help once, and then ignoring continued warning signs, is not sufficient.

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

### Training

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

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



### Support is available for problem gamblers

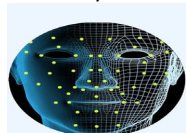
Each year the gambling industry pays circa \$18 - 20 million to the government in the form of a problem gambling levy, so the Ministry of Health can implement its Preventing and Minimising Gambling Harm Strategic Plan (PMGH). These funds pay for the implementation of public health services, intervention services, research, evaluation and workforce development.

### Harm minimisation activities

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

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

In addition to this toolkit, increasingly facial recognition technology is used to identify problem gamblers and assist them to be excluded. NZCT has strongly recommended to the Ministry of Health on the proposed Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25 that this technology be rolled out further as part of problem gambling harm minimisation work underway.



#### The Guardian - Facial Recognition System

A fully integrated, market-leading system that identifies excluded persons as they enter a gaming room, by matching them against a centralised database.

Three short videos showing how the facial recognition system works can be viewed at:

<https://www.coms.net.nz/the-guardian-facial-recognition/>

## 40-15

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



Two of the findings from the inaugural PMGH baseline report were that problem gambling services are effectively raising awareness about the harm from gambling, and interventions for gambling-related harm are moderately accessible, highly responsive and moderate to highly effective.<sup>21</sup> The world's largest clinical trial<sup>22</sup> for problem gambling treatment found that, one year after calling the Gambling Helpline, three-quarters of callers had quit or significantly reduced their gambling.

### About NZCT

Established in 1998, New Zealand Community Trust (NZCT) is the one of the largest gaming trusts with 13% market share, operating in venues and communities throughout New Zealand. In the 12 months to 30 September 2022, NZCT approved \$39.2 million in grant funding to sporting, local government, education, the arts, health, and community groups nationwide.

NZCT's Board and management take risk mitigation and assurance seriously and our risk framework recognises the need for effective controls and mitigation tools/strategies to prevent and minimise harm from problem gambling.

While most New Zealanders gamble without experiencing any harm, a small minority who participate suffer some degree of harm and the impacts for them and people affected by their gambling, can be significant.

NZCT contributes through the problem gambling levy approximately \$1 million per annum to the collective annual levy of \$18-20 million. That is a significant amount, on top of an estimated \$800,000 which NZCT expends within the organisation each year, on training, resourcing, and technology, such as facial recognition technology (FRT), directed to identifying and mitigating problem gambling in our venues. We have a strong interest in seeing the levy spent effectively.

Over the last 10 years, the Ministry of Health has received more than \$186 million in funding from the four gambling sectors that contribute to the annual levy.

In that period, it appears the problem gambling rate has not reduced, and the key objectives of the strategy have not been met, as confirmed by the damning Needs Assessment Report.

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

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

## 40-16

We have twin goals of serving both our publicans and the communities in which they operate. At least 75% to 80% of the funds we currently distribute are directed towards sports activities, making NZCT the largest funder of amateur sports participation in New Zealand. We focus on sport because of the many positive benefits it offers communities, such as:

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

Overseas research<sup>24</sup> has found participation in sport can lead to increased health and productivity for individuals, and increased wealth or wellbeing of society. While amateur sport is our main focus, we are also strong supporters of other worthy community activities, including local government projects.



### Further information about our Submission information

For further information, or if you have any questions about NZCT's information, contact Don Martin, Communications and Marketing Manager on (04) 495 1594 or [don.martin@nzct.org.nz](mailto:don.martin@nzct.org.nz)

### Our Trustees

#### Alan Isaac

Board Chair

#### David Pilkington

Board Member and Net Proceeds Committee Chair

#### Dame Kerry Prendergast

Board Member and Audit and Risk Committee Chair

#### Lesley Murdoch

Board Member

#### Peter Miskimmin

Board Member

<https://www.nzct.org.nz/about-us/#meet-our-trustees>

<sup>23</sup> Sport England's Value of Sport Monitor.

<sup>24</sup> [http://www.ausport.gov.au/information/asc\\_research/publications/value\\_of\\_sport](http://www.ausport.gov.au/information/asc_research/publications/value_of_sport).



40-17

# Appendix 1

Grants to Palmerston North by NZCT  
October 2019 to May 2023

## 40-18

### Grants to Palmerston North - October 2019 to May 2023

Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
89440	Arohanui Hospice Service Trust	\$20,000.00	\$20,000.00	23/11/2021	Salary
82786	Arohanui Hospice Service Trust	\$5,000.00	\$5,000.00	6/08/2020	Salary
85184	Ashhurst Bowling Club Inc	\$2,840.00	\$2,840.00	19/01/2021	Lawn bowls
80208	Ashhurst Bowling Club Inc	\$2,410.00	\$2,410.00	22/10/2019	Towards lawn bowls
84467	Ashhurst Pohangina Rugby Football Club Inc	\$6,360.00	\$6,360.00	17/11/2020	Playing uniforms - excludes sideline jackets, hoodies and sponsor logos
94169	Ashhurst School	\$11,040.00	\$11,040.00	20/09/2022	Resurfacing of basketball court
87285	Ashhurst School	\$3,481.58	\$3,481.58	18/05/2021	Equipment
98067	Awapuni School Palmerston North	\$16,500.00	\$16,500.00	15/05/2023	Minivan
95283	Awapuni School Palmerston North	\$5,000.00	\$5,000.00	17/10/2022	Travel, accommodation and activities (excluding fuel)
93214	B12 Sports Inc	\$3,255.00	\$3,255.00	19/07/2022	Playing uniforms and equipment
86876	Bowls Palmerston North Inc	\$4,584.82	\$4,584.82	18/05/2021	Green maintenance; Turf renovator; Air compressor
96785	Bunnythorpe Rugby Football Club Inc	\$5,451.76	\$5,451.76	1/03/2023	First Aid; Playing uniforms
84972	Camellia House Trust	\$10,000.00	\$10,000.00	19/01/2021	Salary
85421	Cancer Society of NZ Manawatu Centre Inc	\$15,000.00	\$15,000.00	19/01/2021	Costs associated with Relay for Life Event
90037	Celtic Spirit Inc	\$5,000.00	\$5,000.00	23/11/2021	Musical instruments
84209	Central Region Tournament Water Ski Association of NZ Inc	\$5,387.20	\$5,387.20	20/10/2020	Portable Shower Block; Marquee
97803	College Old Boys Rugby Football Club Inc	\$8,411.20	\$8,411.20	19/04/2023	Equipment; Contractor - Rugby Development Officer
91994	College Old Boys Rugby Football Club Inc	\$8,018.78	\$8,018.78	22/03/2022	Equipment; Contractor - Rugby Development Officer
87642	College Old Boys Rugby Football Club Inc	\$1,500.00	\$1,500.00	22/06/2021	Contractor
81111	College Old Boys Rugby Football Club Inc	\$10,000.00	\$10,000.00	17/12/2019	Towards salary of Administrator; Towards contract fee for Rugby Development Officer
94682	Freyberg Cricket Club Inc	\$2,459.99	\$2,459.99	20/09/2022	Cricket balls
89631	Freyberg Cricket Club Inc	\$1,947.99	\$1,947.99	20/10/2021	Cricket balls
84119	Freyberg Cricket Club Inc	\$1,540.00	\$1,540.00	20/10/2020	Cricket balls
80122	Freyberg Cricket Club Inc	\$2,304.00	\$2,304.00	22/10/2019	Towards cricket balls
92200	Freyberg High School	\$15,000.00	\$15,000.00	19/04/2022	Sports equipment
83636	Freyberg High School	\$9,561.76	\$9,561.76	22/09/2020	Assault air bikes and treadmill; Football nets
92055	Freyberg Old Boys Rugby Football Club Inc	\$8,995.09	\$8,995.09	17/05/2022	Playing uniforms and equipment
85638	Freyberg Old Boys Rugby Football Club Inc	\$10,652.50	\$10,652.50	20/04/2021	Playing uniforms
80295	Freyberg Old Boys Rugby Football Club Inc	\$9,205.00	\$9,205.00	29/11/2019	Towards senior and junior playing uniforms
97569	High School Hockey Club PN Inc	\$8,780.00	\$8,780.00	29/03/2023	Turf Hire; Van Hire; Playing Uniforms
92376	High School Hockey Club PN Inc	\$5,766.00	\$5,766.00	17/05/2022	Equipment
86188	Ice Breaker Aquatics Inc	\$1,500.00	\$1,500.00	22/03/2021	Travel and accommodation - excludes meals
93714	Kairanga School	\$1,200.00	\$1,200.00	19/07/2022	Venue hire
80139	Kopane School	\$2,415.00	\$2,415.00	29/11/2019	Towards shade sail
83076	Linton Camp Golf Club Inc	\$3,911.70	\$3,911.70	6/08/2020	Greens renovation
91193	Lions Club of Middle Districts Inc	\$40,000.00	\$40,000.00	18/01/2022	Construction costs

## 40-19

Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
87187	Manawatu Access Radio Charitable Trust	\$5,442.87	\$5,442.87	18/05/2021	Purchase of staging
94472	Manawatu Freshwater Anglers Club Inc	\$4,330.00	\$4,330.00	23/08/2022	Purchase and transport of trout
89392	Manawatu Freshwater Anglers Club Inc	\$4,000.00	\$4,000.00	21/09/2021	Purchase of trout
83458	Manawatu Freshwater Anglers Club Inc	\$2,500.00	\$2,500.00	31/08/2020	Trout and delivery
95454	Manawatu Gymsports Inc	\$9,190.00	\$9,190.00	3/11/2022	Vault
83662	Manawatu Gymsports Inc	\$15,799.40	\$15,799.40	31/08/2020	Beam mats
96555	Manawatu Mountain Bike Club Inc	\$20,000.00	\$20,000.00	17/01/2023	Bike Trail
77015	Manawatu Mountain Bike Club Inc	\$30,000.00	\$30,000.00	22/10/2019	Towards event timing equipment; Towards mountain bike trail build and maintenance costs
93365	Manawatu Scottish Pipe Band Inc	\$3,535.00	\$3,535.00	19/07/2022	Band uniforms
95035	Manawatu Skating Club Inc	\$3,000.00	\$3,000.00	20/09/2022	Travel and accommodation
97865	Marist Club PN Inc	\$47,930.87	\$47,930.87	19/04/2023	Venue and Turf Hire, Lighting Costs
95794	Marist Club PN Inc	\$23,674.50	\$23,674.50	21/11/2022	Playing uniforms and equipment; Contractor - Tennis Coaching; Court hire; Turf hire; Contractor - Men's Cricket Coach
91909	Marist Club PN Inc	\$50,000.00	\$50,000.00	22/03/2022	Ground and turf fees, lighting costs; Playing uniforms and equipment
89318	Marist Club PN Inc	\$23,296.09	\$23,296.09	20/10/2021	Playing uniforms and equipment; Tennis coaching; Court hire; Men's Cricket Coordinator
86384	Marist Club PN Inc	\$58,038.74	\$58,038.74	22/03/2021	Playing uniforms - excludes tracksuits, vests, t.shirts and backpacks; Ground and turf fees; Lighting and court hire
84526	Marist Club PN Inc	\$14,886.84	\$14,886.84	17/11/2020	Tennis nets; Court hire; Contractor - Senior & Junior Tennis Coach; Contractor - Mens Cricket Coaching; Playing mens uniforms - excludes training t.shirts; Womens playing gear
83484	Marist Club PN Inc	\$7,500.00	\$7,500.00	6/08/2020	Practice and playing ground fees
81573	Marist Club PN Inc	\$35,000.00	\$35,000.00	18/02/2020	Ground fees for rugby and football, hockey turf fees; Equipment, playing uniforms
80028	Marist Club PN Inc	\$19,571.27	\$19,571.27	22/10/2019	Towards coaching for senior players; Towards cricket playing equipment; Towards contract for Cricket Coaching; Towards tennis court hireage; Towards cricket playing apparel
91547	Massey University Football Club Inc	\$16,000.00	\$16,000.00	22/03/2022	Contractor - Womens Premiership Team Head Coach; Contractor - Womens Federation Team Head Coach
86955	Massey University Football Club Inc	\$15,000.00	\$15,000.00	18/05/2021	Contractor - Head Coach Mens Federation; Contractor - Head Coach Womens Federation; Equipment - excludes individual bags
97975	Newbury School	\$20,000.00	\$20,000.00	15/05/2023	Sandpit and Swings
93860	Northern Club Manawatu Inc	\$30,000.00	\$30,000.00	16/02/2023	All weather carpet green
89897	Northern Club Manawatu Inc	\$10,000.00	\$10,000.00	20/10/2021	Contractor
95571	Old Boys Cricket Club Palmerston North Inc	\$4,726.13	\$4,726.13	17/10/2022	Cricket balls
89615	Old Boys Cricket Club Palmerston North Inc	\$3,444.99	\$3,444.99	23/11/2021	Cricket balls
83470	Old Boys Cricket Club Palmerston North Inc	\$3,000.00	\$3,000.00	22/09/2020	Cricket balls
80297	Old Boys Cricket Club Palmerston North Inc	\$3,000.00	\$3,000.00	29/11/2019	Towards cricket balls
95184	Palmerston Cricket Club Inc	\$6,000.00	\$6,000.00	17/10/2022	Cricket Balls; Uniforms
82592	Palmerston Cricket Club Inc	\$6,078.00	\$6,078.00	15/12/2020	Cricket balls
86551	Palmerston North Athletic & Harrier Club Inc	\$4,910.00	\$4,910.00	20/04/2021	Equipment
80824	Palmerston North Athletic & Harrier Club Inc	\$5,557.38	\$5,557.38	22/01/2020	Equipment - Electronic starting system

## 40-20

Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
89512	Palmerston North Badminton Club Inc	\$2,875.00	\$2,875.00	22/03/2022	Equipment
93944	Palmerston North Boys High School	\$5,043.48	\$5,043.48	19/07/2022	Facility hire
89964	Palmerston North Boys High School	\$10,713.00	\$10,713.00	20/10/2021	Cricket balls
84285	Palmerston North Boys High School	\$6,000.00	\$6,000.00	20/10/2020	Cricket balls
80755	Palmerston North Boys High School	\$6,000.00	\$6,000.00	17/12/2019	Towards cricket balls for 2019/2020 season
89152	Palmerston North Bridge Club Inc	\$2,802.00	\$2,802.00	20/10/2021	Roller blinds
84854	Palmerston North City Council	\$65,000.00	\$65,000.00	15/12/2020	Construction of a splash pad and equipment - excludes P&G costs
96601	Palmerston North Dance Association Inc	\$10,035.13	\$10,035.13	12/12/2022	Fee for Adjudicator - excludes expenses; Accommodation for adjudicator and writer; Venue hire
90672	Palmerston North Dance Association Inc	\$9,352.00	\$9,352.00	14/12/2021	Accommodation - excludes food; Venue hire
85125	Palmerston North Dance Association Inc	\$8,302.65	\$8,302.65	23/02/2021	Accommodation for adjudicator & writer - excludes meals; Venue hire
91988	Palmerston North End Association Football Club Inc	\$9,732.00	\$9,732.00	22/03/2022	Referee fees; Ground fees
91436	Palmerston North Golf Club Inc	\$20,000.00	\$20,000.00	21/02/2022	Spraying unit
92566	Palmerston North Squash Club Inc	\$40,000.00	\$40,000.00	17/05/2022	Costs associated with roof repairs
94671	Palmerston North Street Van Inc	\$20,000.00	\$20,000.00	20/09/2022	Purchase of a van
96945	Palmerston North Theatre Trust	\$7,377.00	\$7,377.00	31/01/2023	Air conditioning unit including installation
93974	Palmerston North Theatre Trust	\$2,525.00	\$2,525.00	19/07/2022	Telephone system
94687	Park Road Playcentre	\$8,300.00	\$8,300.00	17/10/2022	Upgrade Paved Outdoor Paths
94838	Performing Arts Competitions Association of NZ Inc	\$15,000.00	\$15,000.00	20/09/2022	Adjudicator accommodation; Adjudicator fees
89590	Performing Arts Competitions Association of NZ Inc	\$30,066.65	\$30,066.65	21/09/2021	Accommodation; Adjudicator Fees (excludes meals)
93209	Philippine Central Association Inc	\$20,000.00	\$20,000.00	21/06/2022	Venue hire
87245	Philippine Central Association Inc	\$20,000.00	\$20,000.00	18/05/2021	Venue hire - excludes liability insurance; Equipment hire - excludes bond
97362	PN Marist Football Club Inc	\$15,000.00	\$15,000.00	21/03/2023	Contractor - Womens Coach - excludes bonus and expenses; Salary - Director of Football - excludes allowances and expenses
92474	PN Marist Football Club Inc	\$15,000.00	\$15,000.00	19/04/2022	Salary
86570	PN Marist Football Club Inc	\$15,000.00	\$15,000.00	20/04/2021	Salary
82975	PN Marist Football Club Inc	\$15,000.00	\$15,000.00	6/08/2020	Salary
87400	Red Sox Sports Club Inc	\$7,500.00	\$7,500.00	22/06/2021	Contractor
82560	Red Sox Sports Club Inc	\$7,500.00	\$7,500.00	29/06/2020	Salary
93192	Ross Intermediate School	\$7,230.00	\$7,230.00	21/06/2022	Equipment
90369	Snapback Gym Inc	\$16,200.00	\$16,200.00	14/12/2021	Salary
83699	Special Olympics Manawatu	\$3,659.00	\$3,659.00	22/09/2020	Travel and accommodation
83048	St James Catholic School	\$3,940.00	\$3,940.00	31/08/2020	Pool cover
91696	St Peters College Palmerston North	\$7,771.26	\$7,771.26	22/03/2022	Artificial cricket wicket
87418	St Peters College Palmerston North	\$4,000.00	\$4,000.00	22/06/2021	Travel and accommodation
83294	St Peters College Palmerston North	\$2,000.00	\$2,000.00	31/08/2020	Playing uniforms - excludes sponsor logo
81056	St Peters College Palmerston North	\$3,600.00	\$3,600.00	17/12/2019	Towards travel and accommodation
92485	Swamp City Roller Rats Inc	\$4,000.00	\$4,000.00	17/05/2022	Travel and accommodation - excludes meals
87873	Swamp City Roller Rats Inc	\$4,265.10	\$4,265.10	22/07/2021	Travel and accommodation - excludes meals
98050	Takaro Association Football Club Inc	\$12,791.86	\$12,791.86	15/05/2023	Ground and referee fees
92510	Takaro Association Football Club Inc	\$10,935.90	\$10,935.90	19/04/2022	Ground and referee fees
86646	Takaro Association Football Club Inc	\$10,200.00	\$10,200.00	20/04/2021	Ground and referee fees

## 40-21

Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
82401	Takaro Sports Club Inc	\$3,200.00	\$3,200.00	29/06/2020	Equipment
97003	Te Pae Poitarawhiti O Ikaroa Ki Te Raki	\$11,336.00	\$11,336.00	16/02/2023	Travel and accommodation
91707	Te Pae Poitarawhiti O Ikaroa Ki Te Raki	\$20,000.00	\$20,000.00	22/03/2022	Venue hire - excludes catering
87734	Turitea School	\$1,960.00	\$1,960.00	21/09/2021	Sunhats
97632	Youthline Central North Island Inc	\$2,716.60	\$2,716.60	31/05/2023	T.shirts - excludes hoodies
		<b>\$1,303,821.08</b>	<b>\$1,303,821.08</b>		
<b>Regional grants that benefit Palmerston North City</b>					
92154	Alzheimers Society Manawatu Inc	\$5,000.00	\$2,200.00	19/04/2022	Salary
87974	Alzheimers Society Manawatu Inc	\$5,000.00	\$2,300.00	2/09/2021	Salaries of two Dementia Advisors
94634	Arohanui Hospice Service Trust	\$20,000.00	\$8,085.11	20/09/2022	Salaries of Palliative Care Coordinator and Palliative Care Social Worker
92744	Badminton Central Region Inc	\$8,455.66	\$421.19	17/05/2022	Hall hire from 17 May 2022 and Central Region Coordinator
92436	Basketball Manawatu Inc	\$40,000.00	\$17,600.00	19/04/2022	Salary
87919	Big Bang Adventure Charitable Trust	\$16,200.00	\$891.00	22/07/2021	Assistant Event Manager, Event Manager and Safety services
99051	Big Brothers Big Sisters of Manawatu	\$5,000.00	\$2,099.07	31/05/2023	Salaries of Mentoring Coordinator and Mentoring Coordinator/ Caseworker/ Administrator
96599	Bike Manawatu Inc	\$10,000.00	\$2,100.00	17/01/2023	Contractor
91508	Bike Manawatu Inc	\$10,000.00	\$2,000.00	22/03/2022	Contractor
85326	Bike Manawatu Inc	\$10,000.00	\$2,100.00	23/02/2021	Contractor
80786	Bike Manawatu Inc	\$10,000.00	\$3,000.00	22/01/2020	Salary
89986	Bowls Manawatu Inc	\$5,000.00	\$2,150.00	23/11/2021	Travel and accommodation - excludes food and parking costs
82011	Brain Injury Association Central Districts Inc	\$3,600.00	\$1,152.00	6/08/2020	Salary
86778	Cancer Society of NZ Central Districts Division Inc	\$20,000.00	\$1,144.30	20/04/2021	Towards salaries of Volunteer Coordinators
82626	Cancer Society of NZ Central Districts Division Inc	\$20,000.00	\$1,600.00	6/08/2020	Salaries of regional Volunteer Coordinators
96756	Cancer Society of NZ Manawatu Centre Inc	\$15,000.00	\$3,150.00	17/01/2023	Costs Associated with Relay for Life 2023
91267	Cancer Society of NZ Manawatu Centre Inc	\$1,255.00	\$564.75	21/02/2022	Umbrellas
93131	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$112,000.00	\$1,089.41	19/07/2022	Travel and accommodation for 2022 Futsal Youth Championships (on behalf of all federations)
91875	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$96,675.00	\$1,394.93	22/03/2022	Travel costs for 2022 National Youth Development League (on behalf of all federations)
87364	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$140,000.00	\$2,455.86	22/06/2021	Accommodation and flights for 2021 National Age Group Tournament (on behalf of all federations)
85485	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$106,049.00	\$724.76	19/01/2021	Venue hire and flights for 2021 Futsal National Age Group Tournament (on behalf of all federations)
80747	Capital Football Inc - No 5 District Federation of NZ Football Inc	\$111,080.00	\$1,416.27	29/11/2019	Towards travel for the 2020 Futsal Youth Nationals (on behalf of all federations)
94047	Central Canoe Polo Association Inc	\$1,876.00	\$225.64	23/08/2022	Vehicle Hire
97045	Central Districts Cricket Association Inc	\$108,000.00	\$8,038.96	16/02/2023	Salaries of Coach - Performance and Pathways - Central Hub, Coach - Performance and Pathways - Hawkes Bay and Coach - Female Performance and Pathways
95069	Central Districts Cricket Association Inc	\$45,770.00	\$1,517.26	20/09/2022	Salaries of Coach Performance & Pathways - Hawkes Bay, Coach - Female Performance & Pathways, and Head of Operations

## 40-22

Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
91100	Central Districts Cricket Association Inc	\$104,230.00	\$7,694.30	18/01/2022	Salary of Coach Female Performance and Pathways and regional Development Programmes
85158	Central Districts Cricket Association Inc	\$150,000.00	\$11,466.00	15/12/2020	Regional development programmes
81143	Central Districts Cricket Association Inc	\$135,607.60	\$14,583.93	17/12/2019	Towards salary for Head Coach - Central Hinds; Towards District Development programmes (excluding Wanganui Cricket); Towards fee for Emerging Talent and Womens Strength and Conditioning Coach; Towards equalised tournament costs
85070	Central Region Rowing Development Trust	\$45,002.01	\$2,079.09	15/12/2020	Accommodation - excludes booking fee; Sweep oars; Travel to National Championships; Rowsuits; Single sculls
91603	Central Squash Association Inc	\$15,525.00	\$1,356.97	19/04/2022	Salary
85879	Central Squash Association Inc	\$15,000.00	\$1,323.00	23/02/2021	Salary
80752	Central Zone Deaf Rugby Union Inc	\$4,319.97	\$233.28	17/12/2019	Towards travel and accommodation (excludes food)
94555	Environmental White Water Park Trust	\$13,043.48	\$2,478.27	23/08/2022	Supply, delivery and placement of rock
86632	Environmental White Water Park Trust	\$54,193.48	\$11,380.63	20/04/2021	Engineering costs; IT hardware and installation costs (canoe scoring and timing equipment); Rock supply and placement
80160	Environmental White Water Park Trust	\$70,000.00	\$9,800.00	29/11/2019	Towards Mangahao upgrade (National White Water Centre for Excellence)
97826	Footnote Dance Trust Board	\$6,289.23	\$461.58	19/04/2023	Travel and Accommodation
84683	Greasy Chain Charitable Trust Board	\$5,000.00	\$2,300.00	15/12/2020	Traffic management
80272	Greasy Chain Charitable Trust Board	\$1,535.00	\$460.50	29/11/2019	Towards first aid and ambulance service
94679	Hockey Manawatu Inc	\$55,000.00	\$22,916.67	27/10/2022	Participation and Development Officer; Salaries of Competitions Manager and General Manager
90003	Hockey Manawatu Inc	\$55,280.00	\$23,770.40	20/10/2021	Salaries of Participation and Development Officer, Competitions Manager, Office Manager and General Manager
83563	Hockey Manawatu Inc	\$46,659.00	\$17,730.42	31/08/2020	Salaries of Office Manager and General Manager
94538	Hurricanes Youth Rugby Council Inc	\$6,313.04	\$369.03	23/08/2022	Accommodation (excluding meals and laundry)
88787	Hurricanes Youth Rugby Council Inc	\$8,953.05	\$471.15	2/09/2021	Accommodation (excludes meals and laundry)
98628	ITF NZ Taekwon-do Central Districts Inc	\$7,520.00	\$1,488.63	17/05/2023	Sparring equipment
97549	Kartsport Manawatu Inc	\$10,000.00	\$4,136.22	21/03/2023	Medic fees
93280	Kiwi Canoe Polo Inc	\$13,843.48	\$4,000.00	21/06/2022	Personal flotation devices
80577	Louise Perkins Foundation	\$5,000.00	\$1,500.00	29/11/2019	Salary of role working in Manawatu, Whanganui, Horowhenua and Kapiti
94938	Lower North Island Secondary Schools Netball Inc	\$15,000.00	\$680.37	23/08/2022	Accommodation
95988	Manawatu Badminton Association Inc	\$45,000.00	\$18,750.00	21/11/2022	Salaries of Community and Development Manager and Operations Manager
87614	Manawatu Badminton Association Inc	\$36,000.00	\$7,920.00	2/09/2021	Salaries of General Manager and Executive Manager
83184	Manawatu Badminton Association Inc	\$31,000.00	\$11,780.00	22/09/2020	Salaries of Shuttletime Coaching Coordinator, General Manager and Executive Manager
93254	Manawatu Cricket Association Inc	\$113,101.72	\$43,250.86	21/06/2022	Pitch covers; Salaries of Kaiarahi Rangatahi Youth Cricket Coordinator, Kaiarahi Wahine Female Development Officer, Director of Cricket and General Manager Community Cricket
86330	Manawatu Cricket Association Inc	\$147,750.00	\$67,965.00	22/03/2021	Upgrade of indoor cricket centre; Salaries of Female Development Officer, Youth Coordinator, Director of Cricket and General Manager
80471	Manawatu Cricket Association Inc	\$95,000.00	\$28,500.00	29/11/2019	Towards salaries of Director of Cricket, General Manager Community Cricket and Women's Community Cricket Coordinator, and Connected Clubs Initiative
92751	Manawatu Paraplegic & Physically Disabled Association Inc	\$20,000.00	\$4,000.00	19/07/2022	Salary

## 40-23

Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
85747	Manawatu Paraplegic & Physically Disabled Association Inc	\$20,000.00	\$4,200.00	23/02/2021	Salary
97628	Manawatu Regional Volleyball Association Inc	\$50,000.00	\$20,500.00	19/04/2023	Salaries of Participation and Development Officers
91719	Manawatu Regional Volleyball Association Inc	\$35,000.00	\$15,400.00	19/04/2022	Salaries of Event and Community Coordinator and Development Officer
86453	Manawatu Regional Volleyball Association Inc	\$30,000.00	\$14,100.00	18/05/2021	Salary
96035	Manawatu Riding for the Disabled Association Inc	\$25,000.00	\$10,340.54	13/12/2022	Salary
97932	Manawatu Rugby Football League Inc	\$16,049.00	\$3,370.29	21/03/2023	Travel and accommodation - excludes food; Referee fees
94553	Manawatu Rugby Football League Inc	\$12,401.22	\$2,356.23	20/09/2022	Travel and accommodation; Playing uniforms
92919	Manawatu Rugby Union Inc	\$50,000.00	\$21,379.18	19/07/2022	Salaries of Game Development Club Lead and Chief Executive
89141	Manawatu Rugby Union Inc	\$50,000.00	\$21,500.00	20/10/2021	Equipment; Salaries of Coach Development Manager, Operations Manager and Chief Executive Officer
86069	Manawatu Rugby Union Inc	\$75,000.00	\$34,500.00	22/03/2021	Salaries of Coach Development Manager, Operations Manager and Chief Executive Officer
84237	Manawatu Rugby Union Inc	\$24,921.74	\$11,530.16	20/10/2020	Containers; Equipment (Bouncy castles, giant slides etc)
83160	Manawatu Rugby Union Inc	\$75,000.00	\$24,000.00	6/08/2020	Salaries of Chief Executive Officer, Coach Development Manager and Operations Manager
85442	Manawatu Scottish Pipe Band Inc	\$7,000.00	\$1,470.00	19/01/2021	Instruments
94066	Manawatu Scottish Society of NZ Inc	\$1,628.00	\$658.13	23/08/2022	Airfares
89468	Manawatu Scottish Society of NZ Inc	\$4,108.63	\$1,889.97	21/09/2021	Fire exit door
80587	Manawatu Scottish Society of NZ Inc	\$30,000.00	\$9,000.00	29/11/2019	Towards building upgrade (excludes design fees)
81653	Manawatu Softball Association Inc	\$20,000.00	\$6,000.00	22/01/2020	Accommodation - Excludes catering
96464	Manawatu Touch Association Inc	\$12,000.00	\$4,963.46	13/12/2022	Travel and accommodation
91676	Manawatu Touch Association Inc	\$4,485.70	\$897.14	21/02/2022	Costs associated with Regional tournaments
90094	Manawatu Touch Association Inc	\$12,000.00	\$5,160.00	23/11/2021	Travel and accommodation
85342	Manawatu Touch Association Inc	\$16,539.13	\$3,473.22	19/01/2021	Travel and accommodation - excludes deposit, facility hire - excludes bond, laundry ; Playing uniforms
89135	Manawatu Triathlon Club Inc	\$7,378.50	\$1,623.27	21/09/2021	Various costs associated with Triathlon
93026	Manawatu Wanganui Golf Inc	\$40,000.00	\$8,400.00	21/06/2022	Salary
86476	Manawatu Wanganui Golf Inc	\$40,000.00	\$8,400.00	20/04/2021	Salary
81081	Manawatu Wanganui Golf Inc	\$40,000.00	\$12,000.00	17/12/2019	Salary
83296	Manawatu Water Polo Inc	\$2,550.00	\$1,530.00	31/08/2020	Water polo caps
91143	Mid Central Zone of NZRL Inc	\$75,000.00	\$5,828.48	21/02/2022	Salaries of Administrator, Football and Development Officer and General Manager
85243	Mid Central Zone of NZRL Inc	\$75,000.00	\$5,101.92	19/01/2021	Salaries of Community Football and Development Officer and General Manager
96755	Netball Central Zone Inc	\$206,062.68	\$11,915.64	17/01/2023	Vehicle lease; Salaries of Community Communications & Marketing Co-Ordinator, Office Manager, CEO, Community Emerging Talent Lead, Netball Relationship Manager and Coach Relation - Lower North Island
92046	Netball Central Zone Inc	\$250,244.00	\$10,888.12	22/03/2022	Vehicle leases; Office rent; Salaries of Community Communications & Marketing Co-Ordinator, Office Manager, CEO, Community Emerging Talent Lead, Netball Relationship Manager and Coach Relation
86479	Netball Central Zone Inc	\$249,516.17	\$9,483.17	22/03/2021	Vehicle lease; Van hire; Accommodation - excludes bond; Office rental; Salaries of CEO, Community Emerging Talent Manager, Office Manager, Umpire & Bench Lead, Junior & Youth Lead and Coach Relation Wellington
83117	Netball Central Zone Inc	\$108,000.00	\$6,398.40	6/08/2020	Salaries of Admin and Finance Officer, Junior Development and Youth Lead, Chief Executive Officer, Community Emerging Talent Manager, Coach Relations - Wellington and Umpire and Bench Lead
80926	Netball Central Zone Inc	\$248,200.00	\$27,975.00	18/02/2020	Salaries of Umpire and Bench Lead, Coach Relations - Wellington, Junior and Youth Lead, Community Netball Manager, Coach Relations - Manawatu, Community Emerging Talent Manager and CEO
91660	Netball Manawatu Centre Inc	\$95,000.00	\$40,850.00	17/05/2022	Salaries of Community Manager, Game Development Officer and Development Officer
82951	Netball Manawatu Centre Inc	\$84,461.20	\$38,852.15	20/10/2020	Salaries of Administration Officer, Game Development Officer and Netball Development Officer
94363	No 4 District Federation of NZ Football T/A Central Football Inc	\$160,000.00	\$10,875.00	23/08/2022	Salaries of regional Community Development Officers

## 40-24

Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
89284	No 4 District Federation of NZ Football T/A Central Football Inc	\$160,000.00	\$11,000.00	21/09/2021	Salaries of regional Community Development Officers
83936	No 4 District Federation of NZ Football T/A Central Football Inc	\$160,000.00	\$19,000.00	22/09/2020	Salaries of regional Community Development Officers
79608	No 4 District Federation of NZ Football T/A Central Football Inc	\$160,000.00	\$13,750.00	22/10/2019	Towards salaries of Football Development Officer Poverty Bay, Community Development Manager/Community Development Officer - Hawke's Bay, Community Development Officer - Taranaki, Football Development Officer - Whanganui, Women's Football/Futsal Development Officer - Hawke's Bay and Football Development Officer - Manawatu
95936	NZ Rural Games Trust	\$20,000.00	\$8,333.33	21/11/2022	Event costs (excluding per diem and flights)
89863	NZ Rural Games Trust	\$20,000.00	\$7,050.00	20/10/2021	Operating costs for 2022 NZ Rural Games
84474	NZ Rural Games Trust	\$10,000.00	\$4,600.00	15/12/2020	Costs associated with Rural Games - excludes expenses
95377	Southern Hearing Charitable Trust	\$15,000.00	\$876.95	27/10/2022	Salary
88618	Southern Hearing Charitable Trust	\$20,000.00	\$783.78	2/09/2021	Salary
92766	Special Olympics Lower North Island Regional Council	\$8,000.00	\$595.15	19/07/2022	Van Hire and Accommodation; Lift Tickets and Instructors
88723	Special Olympics Lower North Island Regional Council	\$8,000.00	\$354.29	20/08/2021	Costs associated with camp trip from 24th August 2021
83085	Special Olympics Lower North Island Regional Council	\$12,610.00	\$757.38	6/08/2020	Van hire and accommodation; Mountain passes
95039	Special Olympics Manawatu	\$3,451.31	\$1,438.05	20/09/2022	Stop Watch; Accommodation; Van Hire
92768	Special Olympics Manawatu	\$3,500.00	\$735.00	21/06/2022	Travel and accommodation; Equipment
88617	Special Olympics Manawatu	\$15,000.00	\$3,300.00	2/09/2021	Costs associated with National Summer Games - excludes food
86282	Special Olympics Manawatu	\$2,034.78	\$936.00	22/03/2021	Accommodation
97847	Special Olympics Manawatu Trust	\$14,352.52	\$5,936.51	19/04/2023	Travel and Accommodation in NZ (excludes all overseas costs); Van Hire
94909	Sport Manawatu Charitable Trust	\$50,000.00	\$20,212.77	20/09/2022	Salaries of Active Transport Lead and Community Partnership Advisor - Sport
86603	Sport Manawatu Charitable Trust	\$50,000.00	\$10,500.00	20/04/2021	Salary
80294	Sport Manawatu Charitable Trust	\$48,461.52	\$26,653.84	22/10/2019	Salary
97058	Swimming Manawatu Inc	\$7,239.13	\$2,994.26	18/01/2023	Pool hire
93671	Swimming Manawatu Inc	\$3,238.00	\$1,377.87	19/07/2022	Pool hire
90741	Swimming Manawatu Inc	\$6,032.60	\$2,775.00	18/01/2022	Pool hire
85432	Swimming Manawatu Inc	\$6,032.60	\$2,775.00	19/01/2021	Pool hire
83155	Swimming Manawatu Inc	\$3,862.20	\$1,235.90	6/08/2020	Pool hire
81287	Swimming Manawatu Inc	\$6,032.61	\$1,809.78	22/01/2020	Pool hire
94651	Tennis Central Region Inc	\$90,000.00	\$4,376.84	20/09/2022	Salaries of Senior Events Coordinator, Events & Operations Manager and Participation Manager, and Chief Executive Officer contract
88916	Tennis Central Region Inc	\$90,000.00	\$4,507.92	21/09/2021	Salaries of Senior Events Coordinator, Participation Manager and Events & Operations Manager
80671	Tennis Central Region Inc	\$87,000.00	\$8,156.25	29/11/2019	Towards salaries of Participation Manager, Senior Events Coordinator and Events & Operations Manager
94380	Tennis Manawatu Inc	\$30,000.00	\$12,500.00	27/10/2022	Salaries of Youth Development Officer and Executive Officer
87655	Tennis Manawatu Inc	\$30,000.00	\$6,600.00	2/09/2021	Salaries of Executive Officer and Youth Development Officer
82247	Tennis Manawatu Inc	\$10,000.00	\$6,100.00	29/06/2020	Salary
94275	Wellington Softball Association Inc	\$14,269.22	\$1,013.98	23/08/2022	Salary for role working with clubs and associations across the lower North Island
89155	Wellington Softball Association Inc	\$50,000.00	\$2,575.90	21/09/2021	Salary for role working with clubs and associations across the lower North Island
83746	Wellington Softball Association Inc	\$50,000.00	\$3,040.00	22/09/2020	Salary for role working with clubs and associations across the lower North Island
93986	YMCA Central Inc	\$21,621.16	\$4,108.02	23/08/2022	Tools and Equipment
85499	YMCA Central Inc	\$7,179.72	\$1,507.74	19/01/2021	Kitchen upgrade
		<b>\$5,802,590.06</b>	<b>\$1,015,343.79</b>		

Grants to National organisations that benefit Palmerston North City



## 40-25

Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
83098	Basketball NZ Inc	\$65,555.40	\$2,097.77	6/08/2020	Regional Coordinator contract fees
91868	Blue Light Ventures Inc	\$7,194.78	\$1,195.05	19/04/2022	Accommodation (excludes meals); Salaries of Community Youth Workers and Mentors and National Youth Development Coordinator
96977	Canteen Aotearoa Inc	\$40,000.00	\$525.31	16/02/2023	Salaries of Youth Workers
89551	Croquet NZ Inc	\$43,000.00	\$6,600.00	21/09/2021	Salaries of Inclusion Officer and Sport Development Officer
97430	Get Kids Active Charitable Trust	\$25,000.00	\$5,000.00	21/03/2023	Event costs
91687	Get Kids Active Charitable Trust	\$25,000.00	\$772.75	22/03/2022	Venue hire, sound, lighting and equipment
86443	Get Kids Active Charitable Trust	\$25,000.00	\$181.44	20/04/2021	Costs associated with Junior Tough Guy & Gal events
81717	Get Kids Active Charitable Trust	\$25,000.00	\$968.00	29/06/2020	Costs associated with Tough Guy Challenge
95836	Golf NZ Korowha Aotearoa Inc	\$150,000.00	\$8,000.00	21/11/2022	Salaries of Club Capability Manager - Canterbury, Regional Performance Golf Coordinator, Regional Golf Club Capability Officer - Bay of Plenty and Young People Participation Manager Auckland
90431	Golf NZ Korowha Aotearoa Inc	\$150,000.00	\$7,700.00	23/11/2021	Salaries of Regional Performance Golf Coordinator - Manawatu/Whanganui, Regional Support Manager - BOP, Club Capability Manager - Canterbury and Participation Programmes Coordinator
84535	Golf NZ Korowha Aotearoa Inc	\$150,000.00	\$1,224.32	17/11/2020	Salaries of Regional Support Manager - Lower North Island, Regional Support Manager - South Island, Regional Support Manager - Waikato/BOP and Regional Support Manager Northern
97579	Gymsports NZ Inc	\$190,000.00	\$2,858.92	15/05/2023	Vehicle Lease; Salaries of Community Sport Manager, Upper South Relationship Manager, Central Region Relationship Manager, Midlands Region Relationship Manager and Auckland/North Region Relationship Manager
91548	Gymsports NZ Inc	\$180,000.00	\$2,308.50	22/03/2022	Salaries of Community Sport Manager, South Relationship Manager, Central Relationship Manager and Midlands Relationship Manager
86503	Gymsports NZ Inc	\$189,101.92	\$1,927.67	22/03/2021	Salaries of Operations Manager, Community Sport Manager, National Support Administrator, Midlands Relationship Manager, Central Relationship Manager and Southern Relationship Manager
83157	Gymsports NZ Inc	\$100,000.00	\$960.00	6/08/2020	Salaries of Community Sport Manager, National Support Administrator, Relationship Team Manager, Midlands Relationship Manager, Central Relationship Manager and Southern Relationship Manager (excludes wage subsidy)
94861	Halberg Foundation	\$120,000.00	\$2,268.27	20/09/2022	Salaries of regional Disability Sport Advisors and Lead Advisors
89266	Halberg Foundation	\$120,000.00	\$2,185.04	21/09/2021	Salaries of regional Disability Sport Advisors
83684	Halberg Foundation	\$120,000.00	\$3,344.00	22/09/2020	Salaries of regional Disability Sport Advisors
80196	Hockey NZ Inc	\$111,249.96	\$312.00	22/10/2019	Towards fees for Regional Development Programmes, and salaries of Community Coaching Manager, Community Hockey Manager - Central, Community Hockey Manager - Canterbury, Community Hockey Manager - Participation, Event Manager, Community Hockey Manager - Capability and GM Community Hockey & Events
97355	Motor Neurone Disease Association of NZ Inc	\$11,000.00	\$636.08	29/03/2023	Salary
92645	OnBoard Skate NZ Inc	\$10,000.00	\$2,000.00	17/05/2022	Salary
97335	Parkinsons NZ	\$29,974.00	\$4,578.79	21/03/2023	Salaries of Parkinson's Educator for Gisborne and Eastern Bay of Plenty, Taranaki, Manawatu and Northwestern Bay of Plenty
88498	Royal NZ Foundation of the Blind Inc	\$25,000.00	\$5,500.00	2/09/2021	Purchase of a vehicle
94422	Scout Association of NZ	\$75,000.00	\$1,406.46	23/08/2022	Salaries of General Manager South Island, General Manager Lower North Island and General Manager Upper North Island
88504	Scout Association of NZ	\$50,000.00	\$391.89	2/09/2021	Salaries of General Manager - Upper North Island, General Manager - Lower North Island and General Manager - South Island
92933	Special Olympics NZ	\$235,800.00	\$2,372.70	21/06/2022	Salary of Regional Sports Coordinators
85902	Special Olympics NZ	\$250,000.00	\$3,820.72	23/02/2021	Salaries of Regional Sports Coordinators
82788	Special Olympics NZ	\$125,000.00	\$3,200.00	29/06/2020	Salaries of Regional Sports Coordinators, Sports Director - Auckland, Team Lead RSC - Central North Island
97391	Surf Life Saving NZ Inc	\$60,000.00	\$1,130.52	21/03/2023	Salaries of Sport Manager Central, Sport Manager Southern and Sport Manager Eastern
93090	Surf Life Saving NZ Inc	\$55,000.00	\$961.77	21/06/2022	Salaries of Sport Manager Central, Sport Manager Southern and Sport Manager Eastern

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Grant #	Organisation	Total Amount Approved	Amount drawn from Palmerston North	Date of Approval	Purpose
83209	Surf Life Saving NZ Inc	\$50,000.00	\$1,485.80	22/09/2020	Salaries of Sport Manager Eastern Region, Sport Manager Central Regional and Sport Manager Southern Region
96773	Swimming NZ Inc	\$80,000.00	\$3,687.87	16/02/2023	Wanganui / Manawatu Water Skills for Life Advisor; BOP Water Skills for Life Advisor; Waikato Water Skills for Life Advisor; Salaries of Education Advisor - South Auckland, Canterbury Aquatic Education and Water Safety Advisor and North Island Aquatic Education and Water Safety Manager
90394	Swimming NZ Inc	\$80,000.00	\$1,108.70	23/11/2021	Salaries of Canterbury Aquatic Education and Water Safety Advisor, Wellington Aquatic Education and Water Safety Advisor, Hawkes Bay Aquatic Education and Water Safety Advisor and North Island Aquatic Education and Water Safety Manager (excludes benefits and expenses)
92225	Tennis NZ Inc	\$90,000.00	\$3,668.88	19/04/2022	Book A Court hardware installations; Salaries of Participation Coordinator, Coach Development Manager and Head of Participation and Coaching
89305	Triathlon NZ Inc	\$114,000.00	\$12,000.00	20/10/2021	eSport Equipment Bikes and Treadmills for Manawatu, Tauranga and Rotorua; Technical and Events Coordinator, Community Special Projects and Admin, Marketing and Communication, Health and Safety, and salary of Community Manager
98139	Volleyball NZ Inc	\$100,000.00	\$2,129.75	15/05/2023	Travel and Accommodation
89657	Volleyball NZ Inc	\$160,000.00	\$95.79	23/11/2021	Referee Development Manager (North Island), Education and Development Manager, Development and Performance Strategist, Game Development Manager, Business Administration Manager and Chief Executive
96774	Yachting NZ Inc	\$145,000.00	\$1,879.97	17/01/2023	Salaries of Regional Development Manager - Bay of Plenty, Regional Development Manager - Central, Regional Development Manager - Southern and Regional Development Manager - Northern
91127	Yachting NZ Inc	\$145,000.00	\$1,988.82	21/02/2022	Salaries of Regional Development Manager - Bay of Plenty, Regional Development Manager - Canterbury, Regional Development Manager - Central and Regional Development Manager - Northern
85826	Yachting NZ Inc	\$152,000.00	\$829.79	23/02/2021	Salaries of Regional Support Officers
		<b>\$3,878,876.06</b>	<b>\$105,303.34</b>		
		<b>\$10,985,287.20</b>	<b>\$2,424,468.21</b>		

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Thomas
Last name	Cleland
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I oppose this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

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## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Ivan
Last name	Yeo
Organisation you represent	Asian Family Services
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	AFS opposes clause 4.3, which permits venues to relocate to new premises. AFS believes that allowing Class 4 venues to relocate for any reason undermines the effectiveness of a sinking lid policy.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

7<sup>th</sup> July 2023  
Palmerston North District Council  
Private Bag 11034  
Palmerston North 4412

**Re: Submission for Palmerston North City Council's Class 4 Gambling and Venue Policy Review 2023**

Asian Family Services (AFS) has been providing support to Asian communities living in Aotearoa New Zealand since 1998. Our organisation is a charitable trust and is New Zealand's only service provider for people of Asian backgrounds who are affected by mental health issues and gambling harm. Our gambling harm minimisation services are delivered under a Te Whatu Ora (Health NZ) contract and funded from the gambling levy. Our service operates in three areas: the Asian Helpline, clinical intervention, and public health work.

AFS commends the Council for its consideration of minimising gambling harm in the community and expresses support for the proposed replacement of the current cap on gaming machine numbers with a "sinking lid" policy. A sinking lid policy is recognised as one of the most effective measures to reduce gambling harm and losses. However, AFS opposes clause 4.3, which permits venues to relocate to new premises. AFS believes that allowing Class 4 venues to relocate for any reason undermines the effectiveness of a sinking lid policy.

AFS strongly urges the Council to amend the proposed policy document by disallowing relocations and club mergers. Additionally, AFS endorses PGF Group's submission and supports the recommendations that a sinking lid policy should include the following three provisions:

- **No relocations:** If a venue with electronic gaming machines (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.
- **A ban on any new venues:** No permit will be given to operate any new venue or club in the council area if that venue proposes having EGMs, including TAB venues.

### Asian Population in Palmerston North

According to the 2018 Census data, they are 12% of Asian population in Palmerston North City.

Table 1: Asian population in Palmerston North District Council, 2006, 2013 and 2018

	2006 (%)	2013 (%)	2018 (%)
Asian population	7.2	9.7	12

(Data resource: Stats NZ, <https://www.stats.govt.nz/tools/2018-census-place-summaries/palmerston-north-city#population-and-dwellings>)

As the Asian population in Palmerston North City Council is growing steadily, we recommend that the Council consider Asian's voices at the policy level and adopt a sinking lid policy to protect Asian people from gambling harm.

### Asian Gambling Behaviour

Sobrun-Maharaj, Rossen, and Wong (2012) identified that one of the contributing factors for mental health issues for Asian peoples is problem gambling.

Analysis of data from the Health and Lifestyles Survey over several years shows that, after adjusting for a range of socio-economic factors and gambling predictors, when compared to European/Other, Asian people's risk for individual gambling harm was 9.5 times higher. Furthermore, pokies players were more than twice as likely to be at risk of some level of gambling-related harm compared to other gamblers.

Further research indicates that some aspects of Asian culture (e.g., *yin-yang* in Chinese culture) encourage Asian people to take greater risks on low-probability games compared to Europeans, which makes Asian people more susceptible to gambling harm (Dai, 2012).

Over the past 12 months, AFS provided 4664 counseling sessions to more than 1,447 gambling clients around Aotearoa. Our problem-gambling clients were afflicted with co-existing issues such as suicidal ideation, financial hardship, domestic violence and severe depressive and anxiety symptoms due to problem gambling.

According to the New Zealand Asian Responsible Gambling Report (2021) (Appendix 1) conducted by Asian Family Services, 74.7% of Asians engaged in some form of gambling activity in the last 12 months. Unfortunately, due to being either new to the country or unfamiliar with the health system and services in New Zealand, many who experienced gambling harm did not seek early intervention. The delay in seeking help was partially due to a lack of understanding of behavioural addiction concepts. Often addiction is only understood as a substance abuse issue. The report also indicated that 78.7% of Asian gamblers identified stigma as one reason preventing them from early help-seeking.

**Asian Helpline 0800 862 342 Confidential & professional services [www.asianfamilyservices.nz](http://www.asianfamilyservices.nz)**  
First Floor, 128 Khyber Pass Road, Grafton, PO Box 8021, Symonds Street, Auckland 1150 Phone: (09) 368 0691 Fax: (09) 368 1540

### The main Asian groups who are most vulnerable to the harm of pokies

During the past 23 years, AFS has seen many Asian clients addicted to pokies. We particularly find that the groups below are most vulnerable to gambling harm from pokies:

- Restaurant workers (chefs, kitchen hands, baristas, etc.);
- Cleaners;
- Builders/construction workers;
- Older people;
- International students;
- Work visa holders.

### The main reasons that Asian peoples play pokies

The most common reasons why Asian people play pokies are because:

- Low-barrier game: No English requirement, easy to go and play solo;
- Emotional escape (release stress, run away from conflict with others, etc.);
- Combatting loneliness;
- Making easy money;
- Addiction-driven playing: to win back lost money.

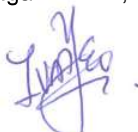
### Sinking Lid Policy

We often hear from our clients, *"I don't want to be hooked on the pokie machines. I want to take back control."* However, the outcome is the exact opposite. It is important to realise that pokie machines are specifically designed to lure people to keep playing and betting more money.

An increase in pokie machines and venues will expose Asian people, migrants and the refugee community to more harm from Class 4 gambling. We support the Council in adopting a sinking lid policy with no relocations or venue mergers permitted.

Thank you for the opportunity to submit.

Ngā mihi nui,



Ivan Yeo

Deputy Director & Public Health Lead  
ivan.yeo@asianfamilyservices.nz

## References

1. Asian Family Services & Trace Research Ltd. (2021). New Zealand Asian Responsible Gambling Report 2021. Auckland, New Zealand. Asian Family Services. <https://www.asianfamilyservices.nz/resources/resource-items/new-zealand-asian-responsible-gambling-report-2021/>
2. Health Promotion Agency. (2018). 2018 New Zealand Mental Health Monitor: Questionnaire. Wellington: Health Promotion Agency.
3. Ministry of Health. (2019). Progress on Gambling Harm Reduction 2010 to 2017: Outcomes report – New Zealand Strategy to Prevent and Minimise Gambling Harm. Wellington: Ministry of Health.
4. Sobrun-Maharaj, A., Rossen, F., & Wong, A, S, K. (2012) The Impact of Gambling and Problem Gambling on Asian Families and Communities in New Zealand. Centre for Asian & Ethnic Minority Health Research, University of Auckland. <https://www.fmhs.auckland.ac.nz/assets/fmhs/soph/sch/cahre/docs/Final%20IGAF%20report%202012.pdf>
5. Dai, Z. (2012). Delay discounting, probability discounting, reward contrast and gambling: a cross-cultural study. Unpublished PhD's thesis, University of Canterbury. [https://ir.canterbury.ac.nz/bitstream/handle/10092/7128/thesis\\_fulltext.pdf;sequence=1](https://ir.canterbury.ac.nz/bitstream/handle/10092/7128/thesis_fulltext.pdf;sequence=1).
6. Stats NZ (2018). Retrieved 4<sup>th</sup> April, 2022, from <https://www.stats.govt.nz/tools/2018-census>.



## Appendix One: New Zealand Asian Responsible Gambling Report 2021


**Gambling activities in the last 12 months**

Bought lotto or instant scratch tickets	<b>67.8%</b>
Private games with friends for money	27.7%
Played gaming machines, or pokies	27.6%
Played Casino table games	25.2%
Placed a bet with the TAB	23.9%
Online gambling and gaming	19.7%


According to New Zealand's "The Gambling Act 2003", lotteries, prize competitions and instant games are also classified as parts of gambling. Are you aware of this classification?

**Yes 53.5% No 46.5%**

**Problem Gambling Severity Classification within NZ's Asian Population**

Approximately **71,736** NZ Asians are problem gamblers 

**Distribution of Problem Gamblers (13.8%) by Ethnicity (>3%)**

<b>Indian</b>	<b>54.4%</b> 
<b>Chinese</b>	<b>15.5%</b>
<b>Filipino</b>	<b>8.7%</b>

**Asians perceive that Asian (76.5%) or Maori/Pacific Island (74.1%) gamblers are stigmatised by society to a slightly greater level compared to a European gambler (65.7%).**

## New Zealand Asian Responsible Gambling Survey

# 2021



Asian Family Services  
Together enriching lives

**Top 5 Perceived Factors for Developing Gambling Addiction**

Lack of financial budgeting/plan	<b>58.6%</b>
Loneliness	<b>49.9%</b>
Job-related stress	<b>48.0%</b>
Certain personality characteristics: being competitive, or...	<b>47.8%</b>
Environmental factors, such as family or friend...	<b>47.3%</b>

**Expressions of Public Stigma about Gamblers with Addiction**

Agree	
Have unrealistic beliefs about winning at gambling	65.9%
Have an addictive personality	61.4%
Are irresponsible with money	57.9%
Are always in debt	51.8%
Are in denial about having a gambling problem	51.7%

**Expressions of Self-Stigma about Gambling by Asian Gamblers**

Disappointed in yourself	<b>35.5%</b>
Guilty	<b>27.8%</b>
That you lack willpower/self-control	<b>27.0%</b>
Ashamed	<b>26.2%</b>
Weak	<b>21.3%</b>

**Top 3 Channels for Seeking Gambling Support**

From family or friends	<b>51.3%</b>
Through self-help strategies	<b>34.9%</b>
From a face-to-face support group	<b>27.8%</b>

**Top 3 Help Seeking Barriers**

Lack of awareness regarding the...	<b>49.3%</b>
Limited knowledge of available...	<b>46.7%</b>
Harmful gambling is hidden due to...	<b>45.5%</b> 

Sample Size = 705 Asians in New Zealand (+/-3.7%), including 527 gamblers

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## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Aperira
Last name	McGregor
Organisation you represent	
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	At this current time, I support the proposed 'sinking lid' process. As a member of the Palmerston North community and a kaimahi working in the addictions space I believe that removing the potential for any further consents would be beneficial for the community.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	The new draft supports the potential reduction in further consents regarding gambling venues. Although this is not going to reduce all harm around gambling it will reduce some harm. Gambling harm is also typically presented with other health issues such as higher levels of smoking, hazardous alcohol consumption and other drug use, as well as higher levels of depression. It also impacts on whanau health and is strongly correlated with whanau and partner violence. Overall the harm of gambling affects those within a whanau, community, hapu and iwi. We needs positive changes and legislation to better support the health and wellness

43-2

	<p>within our community.</p> <p>" The PGF Group advocates for a strong sinking lid - no new licenses or pokie machines, and no relocations or club mergers".</p> <p>Problem Gambling Foundation (2020) Retrieved from <a href="https://www.pgf.nz/tla">https://www.pgf.nz/tla</a></p>
Supporting information	



Submission to PALMERSTON NORTH CITY COUNCIL:  
Proposed Class 4 Gambling Venues Policy

JULY 2023

## 44-2

### 1. INTRODUCTION

We are pleased to submit The Lion Foundation's (TLF) response to the Palmerston North City Council's Review in respect of the Class 4 Gambling and TAB (Board) Venues Policy. Our submission relates to Class 4 Gambling only.

The Lion Foundation is one of New Zealand's largest gaming machine societies by venue number, machine number and money returned to the community through grants.

Formed in 1985, we have distributed over \$1 billion in grants to local, regional and national community causes since our inception and over \$42.3m in our 2022/2023 financial year.

The Lion Foundation acknowledges the thorough and comprehensive process undertaken by the Council Policy Advisors. The New Zealand community funding model is one of the most efficient in the world and we support any review that allows consideration to be given to the **total impact** that gambling has on and within our communities. In New Zealand, gaming is not operated for commercial gain, but rather for community gain.

### 2. SUMMARY OF THE LION FOUNDATION'S POSITION – Class 4 Gambling Venues

The Lion Foundation does not support the adoption of a sinking lid. Our full submission is set out hereinafter. We would appreciate the opportunity to make an oral submission in respect of our submission.

### 3. ABOUT THE LION FOUNDATION (TLF)

The Lion Foundations' purpose, simply put, is to effectively and efficiently sustain community funding. Our aim is to protect and help people build better communities in a way that is safe, ethical, transparent, and consistent with the intent of the Gambling Act.

Our focus is on compliance and the reduction of gambling harm. The Lion Foundation is not here to grow or promote gambling.

TLF aims to return at least 90% of funds back to the community of origin (where the funds were generated), with the remaining 10% of funds being returned to organisations providing a national benefit to all New Zealanders.

All local and regional grants are considered by a Regional Grants Committee, comprised of local community members, who are extremely well placed to ensure that grant funding lands where it is most needed.

We are a broad based, inclusive funder - that is, we fund a wide range of organisations across all community groups. Our grants are committed to the following community sectors:

- Sport
- Community, Arts & Culture
- Health
- Education

## 44-3

### 4. THE LION FOUNDATION IN PALMERSTON NORTH DISTRICT COUNCIL

We currently operate electronic gaming machines (EGMs) at four venues in the district –

- Railways Hotel and Legends Bar (Licensed for and operating 18 EGMs)
- Rosie O' Gradys Palmerston North (Licensed for 18 EGMs and operating 15 EGMs)
- The Pendulum Bar and Eatery (Licensed for and operating 18 EGMs)
- The Workshop (Licensed for and operating 9 EGMs)

The Venue Operators and Managers of these venues are members of the local community and have the community's interest at the heart of the businesses.

Lists of grants distributed by TLF to the community from funds generated by the gaming activity in these venues is attached hereto [Schedule 1- 4] for the period 1 April 2020 – 6 July 2023. Included in the list of grants distributed are some grants that are distributed to organisations outside of Palmerston North. In these instances, the members of the Regional Grants Committee have determined that the community within Palmerston North benefits directly from the services provided by these organisations, and accordingly it was deemed appropriate to utilise a small percentage of 'local funds' to support these excellent organisations

Unfortunately, and due to a Liquor Licensing matter which was successfully overturned on Appeal earlier this year, the EGMs at The Office (now Pendulum Bar and Eatery) did not generate funds for community distribution for over 12 months (16 December 2021 – 3 May 2023).

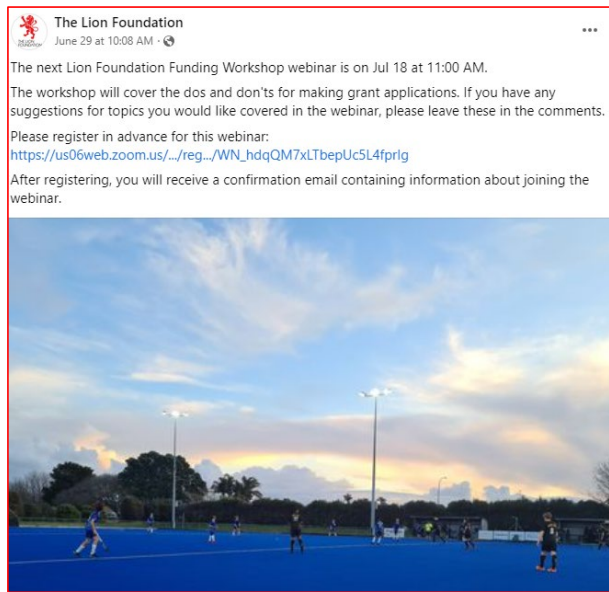
Schedules 1-4 also illustrate the contribution made from local funds to organisations of a national approach. As stated previously, approximately 10% of all funds generated from all venues is allocated to national organisations, which include (not an exhaustive list):

Life Education Trust	Royal NZ Ballet	Graeme Dingle Foundation
Holocaust Centre of NZ	NZ Football	Surf Lifesaving NZ Inc
Special Olympics NZ	Netball NZ	Basketball NZ
Endometriosis N Z	Assistance Dogs NZ	Royal NZ Plunket Soc Inc
Barnardo's N Z	NZ Spinal Trust	NZ Rugby League Inc

It is important to note that TLF has stringent processes that are employed when a grant is assessed to ensure that grant funding lands where it is supposed to land. Grants can only be distributed for authorised purpose (Gambling Act) and can only be distributed upon successful application.

## 44-4

TLF acknowledges that a vast majority of volunteer-based community organisations do not always have the ability to navigate the process that is involved in applying for Class 4 funding. The highly regulated and complicated granting process is difficult enough for professional funding advisors to navigate. In an effort to ensure that all community organisations have a fair opportunity to access community funding, TLF has launched a series of educational webinars. The webinars provide valuable “*how to information*” and are proving to be a success. These webinars supplement the ongoing work that TLF’s Grants Advisors undertake within the community.



## 5. GAMING MACHINE FUNDING

We commenced this submission by stating that consideration needs to be given to the **total impact** that gambling has on and within our communities.

The Gambling Act 2003 seeks to balance the potential harm from gambling against the benefits of using gaming machines as a mechanism for community fundraising. The current policy is working and balances the potential harm from gambling whilst preserving access to community funding. A sinking lid does not preserve community funding.

In 2021, approximately \$269m of grant funding was approved across 19,148 grants to 10,967 different organisations<sup>1</sup>. In addition, over \$50m was applied by various RSAs and Workingmen’s Clubs (\$50m) to support their own activities. 54% of the grants distributed in 2021 were sports-related. The second most popular category was community (20%).

The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis<sup>2</sup>, found that gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.74b to \$2.16b per annum. We would encourage the decision makers to avail themselves of the information contained in this report.

As part of an initiative to inform the Department of Internal Affairs of the value of Community funding in response to a Discussion Document (Reducing Pokies Harm 2022) , the Gaming Machine Association

<sup>1</sup> <https://www.gamblinglaw.co.nz/download/Class-Four-Gaming-Analytical-Review-2021.pdf>

<sup>2</sup> [https://www.gamblinglaw.co.nz/download/Gambling\\_in\\_New\\_Zealand.pdf](https://www.gamblinglaw.co.nz/download/Gambling_in_New_Zealand.pdf)

## 44-5

of New Zealand (GMANZ) collated feedback from numerous community organisations. A very small sample of this feedback:-

**GMANZ - Please explain, in as much detail as you can, how a reduction in community grants would affect your service, group members, and the wider community.**

- ❖ *"A reduction in funding would see a reduction in service and experience, ultimately leading to a decrease in the number of people taking part in sport. This would be a social disaster for a country so long the envy of the world to have a declining participation in sport base that this would create."*
- ❖ *"The less funding we currently annually receive to pay for our leased offices, means the less we are able to deliver our mission which is to grant the one wish of all children aged 3-17 who are living with a critical illness. Funding from Class 4 community grants is critical to our ability to continue to deliver on our mission."*
- ❖ *"We are in a low decile community and rely heavily on grant funding to support our operations. We are an amateur multi-sports club (mainly rugby) and no, or reduced, grant funding would force our closure. This would deny hundreds of kids the opportunity to get into sport, deny them a safe haven, and be an absolute affront to the thousands of volunteers who have helped the club grow over the last 100+ years."*
- ❖ *"Cancer Society benefits from these grants, it helps us to cover the cost of salary and events This will have a direct effect on our services we provide to the wider community".*
- ❖ *"We are a voluntary lifeguard service and reduced funding would impact our ability to offer a front line rescue service. Community grants allow us to purchase equipment for training and subsidize a coach without which over 50 young people would lose out."*

### 6. PROPOSED SINKING LID POLICY

- The Lion Foundation does not support the adoption of a sinking lid policy. The current policy is working and there is no new evidence that suggests that a more restrictive policy is required.
- Gaming machine numbers are in natural decline. In 2003, New Zealand had 25,221 gaming machines. In September 2022, New Zealand had 14,672 gaming machines.
- This is also true for Palmerston North - the Social Impact assessment identifies that not only had the number of EGMS declined, but the number of venues has also declined. This process has occurred naturally. Despite availability in the current capped policy – there has been no growth of EGMS or venues in the City.
- There is no evidence that a reduction in venues or machines results in a reduction in problem gambling<sup>3</sup>.

<sup>3</sup> National Gambling Study, MOH, 2012-2015. *The National Gambling Study (NGS) was the first NZ longitudinal study into gambling, health, lifestyles, and attitudes about gambling. Evidence to date shows that there is no correlation between the number of machines and the prevalence of people seeking help for problem gambling.*

*Funded by the Ministry of Health, the NGS started in 2012 with a randomly selected national sample and followed those respondents over 4*



## 44-6

- The Gambling Harm Needs Assessment 2021<sup>4</sup> (commissioned by the Ministry of Health) has identified that:
  - ❖ The prevalence of harmful gambling remains relatively unchanged (page 7). The most recent gambling participation and prevalence data captured in the HLS survey showed that between 2016 and 2018, the prevalence of harmful gambling among adults (aged 15 years and over) in New Zealand remained relatively unchanged (Te Hiringa Hauora, 2018) (page 32 of the Report).
- The New Zealand National Gambling Study: Wave 4 (2015) found that the problem gambling rate was 0.2% of people aged 18 years and over (approximately 8,000 people nationally). The problem gambling rate is for all forms of gambling, not just gaming machine gambling<sup>5</sup>.
- Figures from the Ministry of Health's Intervention Client data<sup>6</sup> report that in Palmerston North City Council a total of 93 clients sought help in the period July 2020 – June 2021. Of this number – 60 presented as *new clients*. In the period in the period July 2021– June 2022 a total of 172 clients have sought help. Of this number – 142 presented as *new clients*.

Intervention Client Data - Service User Data - Problem									
Table 9: Clients Assisted, by Territorial Authority (All)									
Territorial Authority	July	July 2020 to June 2021				July 2021 to June 2022			
	% of All <sup>4</sup>	New clients Assisted <sup>1</sup>	% of new clients assisted <sup>2</sup>	All clients assisted <sup>3</sup>	% of All <sup>4</sup>	New clients Assisted <sup>1</sup>	% of new clients assisted <sup>2</sup>	All clients assisted <sup>3</sup>	% of All <sup>4</sup>
Palmerston North District Council	0.80%	60	0.73%	93	0.85%	142	2.10%	172	1.78%

- To aid in the understanding of the aforementioned data, the Gambling Harm Needs Assessment 2021 report (commissioned by the Ministry of Health) has identified:
  - ❖ The treatment providers have failed to encourage persons at risk to use their services.
  - ❖ The total number of clients for all interventions was 9,502 (including 2,875 existing clients and 6,627 new clients) – a decrease of 10.4% (-1,100 clients) compared with the previous year (page 42).
  - ❖ The total number of clients, excluding brief interventions, was 4,439 (including 2,487 existing clients and 1,952 new clients) – a decrease of 8.6% (-417 clients) compared with the previous year (page 42).
  - ❖ Users of the Gambling Helpline decreased by 30%, falling from 4,806 users in 2017 to 3,328 in 2019 (page 45).
- The adoption of a sinking lid policy also completely disregards the research that concludes that gambling is a popular form of entertainment that people find enjoyable.
  - ❖ Players mostly realise that they are paying for a leisure experience. They are not

years. The Study showed that despite a reduction in the number of machines from 18,000 in 2012 to 16,000 in 2018, the problem gambling risk did not change significantly from 2012 to 2015. Given population growth, per capita expenditure actually decreased over this period.

<sup>4</sup> <https://www.health.govt.nz/system/files/documents/publications/gambling-harm-needs-assessment-2021.pdf>

<sup>5</sup> <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-report-6-aug18.pdf>

<sup>6</sup> [https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#total\\_assisted](https://www.health.govt.nz/our-work/mental-health-and-addictions/gambling/service-user-data/intervention-client-data#total_assisted)  
Refer table 10

## 44-7

expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.<sup>7</sup>

- ❖ Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.<sup>8</sup>
- Furthermore, TLF believes adopting a sinking lid policy is not appropriate given the significant measures that are already in place to minimise the harm from gaming machines. By way of example (not an exhaustive list):
  - ❖ There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine;
  - ❖ There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won;
  - ❖ Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination;
  - ❖ ATMs are excluded from all gaming rooms;
  - ❖ All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling;
  - ❖ All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling;
  - ❖ All gaming venues have a harm minimisation policy;
  - ❖ All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training;
  - ❖ It is not permissible for a player to play two gaming machines at once; and
  - ❖ The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).

## 7. PROPOSED RELOCATION CLAUSE

We acknowledge that 18 of the 21 venues are currently operating in very high deprivation areas. We are pleased to see that the inclusion/retention of a **relocation clause** in the proposed draft policy. However, and in relation to the proposed amended relocation clause we submit that it is not appropriate to require a venue to wait for a fire, flood, or public works acquisition to move a venue out of a suburban high deprivation area to a more suitable, lower deprivation area. We submit that the reworded clause should be expanded to permit: -

<sup>7</sup> Parke, J. (2015). Gambling, leisure and pleasure: Exploring psychosocial need satisfaction in gambling. Presentation at the KPMG eGaming summit. <https://assets.kpmg/content/dam/kpmg/pdf/2016/07/im-esummit-report-2015.pdf>.

<sup>8</sup> Suits, D. (1979). The Elasticity of Demand for Gambling. The Quarterly Journal of Economics, 93(1), 155–162. <https://doi.org/10.2307/1882605>

## 44-8

- ❖ the relocation of venues out of areas of high deprivation if the new location is in an area of lower deprivation;
- ❖ the relocation of venues out of residential areas;
- ❖ the relocation of venues to more modern buildings, with higher earthquake ratings;
- ❖ the relocation of venues where landlords are imposing unreasonable terms.

## 8. UNREGULATED ONLINE OFFSHORE GAMBLING

Of great concern is the fact that problem gambling associated with **offshore based online gambling** is growing exponentially. By supporting the adoption of sinking lid policies and therefor supporting and encouraging the closure of physical and safe Class 4 gambling environments, the advocates of sinking lid policies are driving [potential problem] gamblers into a world of unregulated and potentially harmful gambling.

The Gambling Harm Needs Assessment 2021 has identified that:-

- ❖ Access to online gambling for money has increased. Gambling Harm services, lived experience and gambling industry representatives (of which we are one) indicated ( at page 26) :-  
*"How easy it is to start to gamble. Just out of boredom. Instead of going to the pub, you can just stay home, download the apps and enter your card details. So it's definitely changed within the past three years. It used to be going down to the pub. Now it's so effortless you just pop out your phone. (lived experience representative)"*

New Zealanders have been informed of the stark realities of the dangers of offshore online gambling by the media:<sup>9</sup>

Online gambling, whether it be pokies or playing live blackjack, is booming.

"When we look at our own customers, what we see is there is about \$30 million a month that's being spent on online gambling and 80 percent of that is offshore," said Julia Jackson, Kiwibank's head of purpose and sustainability.

"It really is [an incredible amount] and what's a really interesting trend that we've seen is from the first COVID lockdown in 2020, that number has massively increased and it hasn't gone down."

The offshore sites raking in millions are based in places including Malta, Cyprus, Gibraltar, Estonia, and Lithuania, where registered companies benefit from low taxes and can offer internet gambling to anyone in the world.

<sup>9</sup> <https://www.newshub.co.nz/home/new-zealand/2022/03/kiwibank-customers-spending-30m-every-month-playing-on-online-gambling-sites.html>

## 44-9

Offshore online gambling providers do not have to operate in accordance with the Gambling Act, do not offer any harm minimisation features to protect players; do not contribute to New Zealand communities.

Furthermore, offshore based online gambling poses considerable risk in that:

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

The Gambling Commission in its recent commentary - **REPORT ON THE PROPOSED PROBLEM GAMBLING LEVY: 2022-2025, dated 10 February 2022**<sup>10</sup>, suggested that the Ministry of Health should give –

*“Serious consideration should be given to including online gambling as a leviable sector within the problem gambling formula set out in section 320 of the Act. Online gambling is already responsible for a growing number of presentations to problem gambling service providers, a trend that is likely to continue as life moves increasingly online”.*

### 9. HARM MINIMISATION

The Lion Foundation is committed to preventing and minimising harm from gambling, including problem gambling, whilst facilitating a responsible and legal form of recreational gambling.

We are committed to creating safe gambling environments in all our venues, and minimising the harm caused by problem gambling.

Venue Operators receive a limited /capped payment – defined by the Gambling Act and related Regulations, more specifically the Gambling (Venue Payments) Regulations 2016<sup>11</sup>. The venue payment is a fair and equitable payment designed to compensate the Venue Operators for the operational costs (staffing etc) incurred in operating the EGMs for the Class 4 Society.

At TLF we play a considerable part in the prevention and minimisation of harm at the venues – *a fence at the top of the cliff* approach. We ensure our Venue Operators and their gaming staff are fully trained in all relevant areas of harm minimisation. We have released an online training system which has been developed by industry professionals. Input has been sought and received from all walks of

<sup>10</sup> [https://www.gamblingcommission.govt.nz/GCwebsite.nsf/wpg\\_URL/Reports-Publications-Problem-Gambling-Levy-2022-2025!OpenDocument](https://www.gamblingcommission.govt.nz/GCwebsite.nsf/wpg_URL/Reports-Publications-Problem-Gambling-Levy-2022-2025!OpenDocument)

<sup>11</sup> <https://www.legislation.govt.nz/regulation/public/2016/0191/latest/DLM6917617.html>

## 44-10

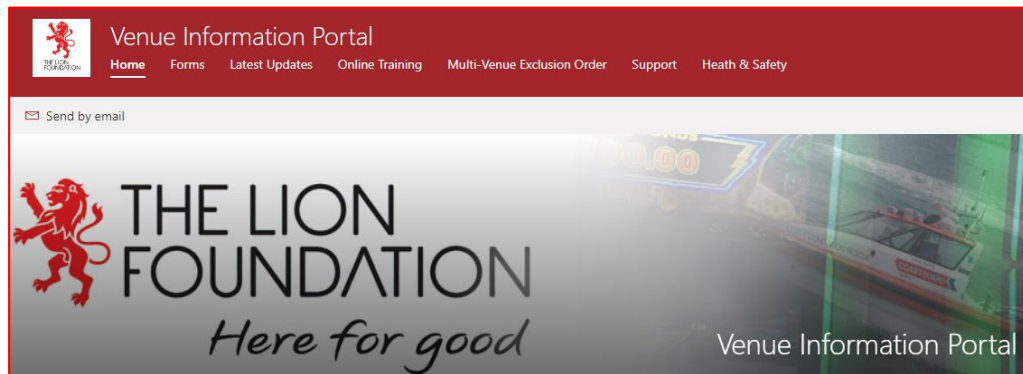
life, including employees of the Salvation Army Oasis National Office. Irrespective of training already undertaken, all venue staff are required to complete this training within a set timeframe – ensuring that standardised training is delivered to all. We are currently reviewing our training programme to ensure compliance with the recently amended Harm Minimisation Regulations.

In addition to our online programme, all staff involved in gaming at The Lion Foundation venues undertake frequent face to face training courses (including refresher courses) run by experienced TLF personnel. All TLF personnel have a wealth of experience in the gaming and hospitality sectors. Training focuses on problem gambling – how to observe and identify problem gamblers, how to support problem gamblers and how to ensure that harm is minimised. Gaming rooms may not be operated unless a person fully trained in harm minimisation is on duty. In addition to the ongoing training, our industry trained staff are constantly in contact with the venue staff and operators and are available to assist with a variety of matters at a moment's notice – either in person or telephonically.

All venue staff are constantly reminded of their obligations in terms of the Harm Minimisation Policy. Our Account Managers are physically present in the venues on a weekly basis – ensuring compliance standards are met.

Facial recognition technology is in use at many of our venues, but not all. The Lion Foundation offers a range of harm minimisation material to the gambler in the venue – including, but not limited to, wallet cards with information for potential problem gamblers, signage in and around gaming rooms from the Health Promotion Agency, etc. Venue staff interaction and supervision and observation of patrons is also key to the minimisation of harm.

By accessing a customised *Venue Information Portal* (screenshot extracts below), venue personnel have immediate access to a suite of harm minimisation products. These include educational videos, the suite of Health Promotion Agency material, training aids, industry updates, Health and Safety material. A Gambling Harm Service referral form is immediately accessible via the portal and assists problem gamblers receive the help that they require from the Salvation Army and other service providers.



## 44-11

We support the introduction of new harm minimisation measures, provided they are based on good evidence that they will have a positive impact on the reduction in harm caused by gambling.

### 10. CONTRIBUTING TO THE PROBLEM GAMBLING LEVY 2022-23 TO 2024-25

Each year the Class 4 Gambling industry contributes significant amounts to a problem gambling levy **in addition** to in-house harm minimisation and prevention initiatives. With a budget of approximately \$76mil over a three-year period<sup>12</sup>, this funding allows the Ministry of Health to support and treat gambling addiction and to increase public awareness.

Has sufficient progress been made in previous years? In addition to extracts from The Gambling Harm Needs Assessment 2021 referenced in previous paragraphs, the report has furthermore identified:

- ❖ There was a common perception among interviewed participants from all gambling stakeholder groups, and many workforce survey respondents, that limited progress had been made across most objectives set out in the Strategy to Prevent and Minimise Gambling Harm 2019/20-2021/22 (page 8).
- ❖ In relation to objectives 1 and 2 (MoH Strategy 2019-2022), reducing gambling-related harm inequities for Māori, Pacific and Asian peoples, and ensuring Māori have healthier futures through the prevention and minimisation of gambling harm; most interviewed participants and around half of the workforce survey respondents considered that little to no progress had been made against both objectives (page 55).

Responding to the Draft Strategy to Prevent and Minimise Gambling Harm 2022-23 to 2024-25, the Gaming Machine Association of New Zealand has implored the Ministry to do things differently<sup>13</sup>. One glaring omission from the strategy is any investment at the top of the cliff – instead of repeating failed investment at the bottom of the cliff.

It is disappointing to note that the Strategy to Prevent and Minimise Gambling Harm 2022-2023 2024-2025, which provides a budget of \$76 million over the period hasn't answered the call for change. The report of the Gambling Commission has highlighted these deficiencies:-

<sup>12</sup> <https://www.health.govt.nz/publication/strategy-prevent-and-minimise-gambling-harm-2022-23-2024-25>

<sup>13</sup> <https://www.gmanz.org.nz/resource/submission-strategy-to-prevent-minimise-gambling-harm-and-the-problem-gambling-levy-2022-2025/>

## 44-12

### 2. EXECUTIVE SUMMARY

2.1 The Commission's recommendations are as follows:

- (a) The total amount of the levy for the period 1 July 2022–30 June 2025 be set at \$76.123 million.
- (b) The weightings of W1 (expenditure) and W2 (presentations) should be set at 30:70.
- (c) Within the next levy period, the Ministry **should undertake a major strategic review of its problem gambling strategy and use that review to determine the necessary funding requirements. Rather than accepting a historically determined budget envelope**, the Ministry should re-assess the future analytical and operational requirements of an integrated problem gambling strategy and develop an updated comprehensive strategy with costings based upon those requirements.
- (d) As part of this review, the **Ministry should collaborate meaningfully** with the main participants of this process; the gambling industry operators, the problem gambling service providers and those with lived experience, **in order to make use of their collective wisdom as part of the process to develop the new strategy**. As part of this review, the Ministry should initiate a long-term research programme which looks beyond the 3-year levy cycle in order to inform future decision making about what makes a real difference in reducing gambling harm in New Zealand.
- (e) **Serious consideration should be given to including online** gambling as a leviable sector within the problem gambling formula set out in section 320 of the Act. Online gambling is already responsible for a growing number of presentations to problem gambling service providers, a trend that is likely to continue as life moves increasingly online.
- (f) The Ministry and the Department of Internal Affairs (the "Department") should investigate whether more refined data can be collected in relation to online gambling expenditure and presentations. At present, "online gambling" appears to be discussed generically but there may be important distinctions from a policy perspective between New Zealand gambling operators which also have an online presence (Lotto, TAB NZ and SKYCITY) and those online operators that are based entirely offshore. Consideration should also be given to refining data in relation to the New Zealand gambling operators which provide both online and terrestrial gambling (Lotto, TAB NZ and SKYCITY). **These data may show whether there are material harm differences between participation in the same form of gambling online or at a physical venue.**

Despite these deficiencies, we hope that the next three years will see a decline in the rates of recidivism [amongst problem gamblers] and a positive change in the prevalence rates which has to date not been witnessed despite substantial investment over the past 10 years.

### 10. CONCLUSION

It is our submission that the Council's policy needs to optimise the balance between reasonable controls over the incidence of problem gambling against the generation of funds for the community from legitimate gambling. The adoption of a sinking lid does not, in our opinion achieve this.

Finally, we are not here to grow gambling; we believe though that pragmatic use of funds generated by this legalised form of entertainment make a hugely positive contribution to community life across New Zealand.

*For further comment or information please contact Tony Goldfinch at The Lion Foundation on 027 496 4309, or email: [Tony.Goldfinch@lionfoundation.org.nz](mailto:Tony.Goldfinch@lionfoundation.org.nz); or Samantha Alexander on 0272 088 588 or email: [Sam.Alexander@lionfoundation.org.nz](mailto:Sam.Alexander@lionfoundation.org.nz)*

## SCHEDULE ONE Approved Grants - Payments by TLA

As of 2023-07-06 13:53:32 New Zealand Standard Time/NZST • Generated by Sam Alexander • Sorted by Grant Request: Organisation Name (Ascending)

### Filtered By

Show: All tlas

Date Field: Payment Date equals Custom (1/04/2020 to 31/03/2021)

Allocated Amount greater or equal 1

TLA ID equals 48

Grant Request: Org TLA ↑	Grant Request: Category ↑	Grant Request Number	Grant Request: Organisation Name	Amount Requested	Allocated Amount	Final Granted Amount
Christchurch City Council	Health	9031227	Southern Hearing Charitable Trust	\$100,000.00	\$12,000.00	\$50,000.00
	Subtotal					\$50,000.00
		1				
Subtotal		1				\$50,000.00
Horowhenua District Council	Community - Culture - Arts	9029939	Horowhenua Prisoners Aid And Rehabilitation Society Inc	\$6,000.00	\$2,424.00	\$4,848.00
	Subtotal					\$4,848.00
		1				
Subtotal		1				\$4,848.00
LF National	Community - Culture - Arts	9028694	Chamber Music New Zealand Trust Board	\$36,000.00	\$4,000.00	\$12,000.00
		9031735	Scout Assn of N Z	\$50,000.00	\$12,000.00	\$40,000.00
	Subtotal					\$52,000.00
		2				
	Education	9031325	Road Safety Education Ltd	\$40,000.00	\$5,000.00	\$20,000.00
	Subtotal					\$20,000.00
		1				
	Health	9029709	I H C N Z Inc	\$95,500.00	\$20,000.00	\$56,000.00



## 44-14

		9030250	Kenzies Gift Charitable Trust	\$32,000.00	\$6,000.00	\$24,000.00
		9031107	Prostate Cancer Foundation of NZ Inc	\$64,434.54	\$10,000.00	\$35,000.00
		<b>Subtotal</b>				\$115,000.00
		3				
	Sport	9030534	Baseball N Z Foundation	\$38,320.00	\$5,000.00	\$20,000.00
		9030499	N Z Golf Inc	\$186,500.00	\$5,000.00	\$60,000.00
		9031274	Swim Coaches and Teachers of N Z Inc	\$12,200.00	\$1,500.00	\$6,000.00
		<b>Subtotal</b>				\$86,000.00
		3				
	<b>Subtotal</b>					\$273,000.00
		9				
Manawatu District Council	Community - Culture - Arts	9030745	Moneywise Manawatu	\$25,000.00	\$18,858.00	\$18,858.00
	<b>Subtotal</b>					\$18,858.00
		1				
	Sport	9031658	Manawatu Rugby Football League Inc	\$18,006.80	\$16,793.00	\$16,793.00
	<b>Subtotal</b>					\$16,793.00
		1				
<b>Subtotal</b>						\$35,651.00
		2				
Napier City Council	Sport	9029806	No 4 District Fed of N Z Football T/A Central Football Inc	\$38,000.00	\$5,000.00	\$15,000.00
	<b>Subtotal</b>					\$15,000.00
		1				
<b>Subtotal</b>						\$15,000.00
		1				
Palmerston North City Council	Community - Culture - Arts	9029707	Alliance Francaise de Palmerston North Inc	\$18,543.00	\$6,000.00	\$6,000.00
		9030622	Green Hub Trust	\$5,000.00	\$4,000.00	\$4,000.00
		9029513	Housing Advice Centre (Palmerston North) Inc	\$3,155.64	\$3,156.00	\$3,156.00
		9029918	Legacy Centre	\$52,776.61	\$48,105.00	\$48,105.00
		9029631	Legacy Housing	\$32,000.00	\$30,000.00	\$30,000.00
		9031064	Manawatu Access Radio Charitable Trust	\$11,550.00	\$10,000.00	\$10,000.00

## 44-15

		9031669	Manawatu Performing Arts Competition Soc Inc	\$2,843.00	\$2,843.00	\$2,843.00
		9029112	Manawatu Scottish Soc of N Z Inc	\$72,400.00	\$30,000.00	\$30,000.00
		9030967	Palmerston North Bridge Club Inc	\$2,574.09	\$2,574.00	\$2,574.00
		9029867	Palmerston North City Council	\$150,000.00	\$120,000.00	\$120,000.00
		9030291	Palmerston North City Neighbourhood Support Groups Inc	\$20,000.00	\$5,000.00	\$5,000.00
		9030575	Palmerston North Esplanade Scenic Railway Inc	\$15,000.00	\$15,000.00	\$15,000.00
		9029797	Palmerston North Operatic Soc Inc	\$50,000.00	\$10,000.00	\$10,000.00
		9030123	Rugby Museum Soc of N Z	\$10,000.00	\$10,000.00	\$10,000.00
		9030598	Te Whare O Nga Wahine Palmerston North Womens Centre	\$7,490.00	\$7,148.00	\$7,148.00
		9031694	Thistle Caledonian Soc Inc	\$670.00	\$670.00	\$670.00
	Subtotal					\$304,496.00
		16				
	Education	9029912	Central Normal School	\$4,437.00	\$4,437.00	\$4,437.00
		9030578	Freyberg High School	\$16,413.33	\$16,210.00	\$16,210.00
		9029793	Hokowhitu School	\$3,570.00	\$3,570.00	\$3,570.00
		9030750	Learning and Growing Together Trust	\$20,256.00	\$17,616.00	\$17,616.00
		9029204	Life Education Trust Manawatu	\$11,200.00	\$11,200.00	\$11,200.00
		9030612	Linton Camp School	\$6,550.00	\$5,000.00	\$5,000.00
		9030367	Palmerston North Parents Centre	\$4,599.99	\$4,600.00	\$4,600.00
		9031131	Parentline Manawatu Inc	\$20,000.00	\$10,000.00	\$10,000.00
		9029216	Parent to Parent N Z Inc - Manawatu	\$2,931.00	\$965.00	\$965.00
		9031205	Plant to Plate Aotearoa	\$5,000.00	\$5,000.00	\$5,000.00
		9031261	Prisoners Aid and Rehabilitation Soc of the Manawatu Distr	\$13,000.00	\$12,000.00	\$12,000.00
		9030576	SPELADD N Z Inc	\$5,750.00	\$4,792.00	\$4,792.00
		9029773	St Peters College - Palmerston North	\$21,695.00	\$15,000.00	\$15,000.00
	Subtotal					\$110,390.00
		13				
	Health	9029447	Abbeyfield Palmerston North Inc	\$12,000.00	\$10,000.00	\$10,000.00
		9031353	Brain Injury Assn Central Districts Inc	\$12,000.00	\$12,000.00	\$12,000.00
		9029078	CCS Disability Action Manawatu / Horowhenua Inc	\$5,500.00	\$5,500.00	\$5,500.00
		9029804	Manawatu Horowhenua and Tararua Diabetes Trust	\$14,500.00	\$14,000.00	\$14,000.00
		9029889	Royal N Z Foundation of the Blind	\$46,520.00	\$5,500.00	\$25,000.00
		9029933	Supporting Families in Mental Illness Manawatu Inc	\$30,000.00	\$20,000.00	\$20,000.00
		9029835	Te Hā o Hine-ahu-one Palmerston North Womens Health C	\$7,137.00	\$6,000.00	\$6,000.00

## 44-16

		9029279	Vision Community Trust	\$47,826.00	\$47,826.00	\$47,826.00
	<b>Subtotal</b>					\$140,326.00
		8				
	<b>Sport</b>					
		9029920	Bike Manawatu Inc	\$7,990.00	\$3,690.00	\$3,690.00
		9030573	Bowls Palmerston North Inc	\$6,078.00	\$5,000.00	\$5,000.00
		9031783	Bunnythorpe Rugby Football Club Inc	\$2,920.00	\$1,391.00	\$1,391.00
		9029308	Hockey Manawatu Inc	\$50,000.00	\$14,375.00	\$14,375.00
		9030357	Kiwi West Aquatics Inc	\$5,750.00	\$5,000.00	\$5,000.00
		9029179	Manawatu Badminton Assn Inc	\$28,843.00	\$20,000.00	\$20,000.00
		9030852	Manawatu Cricket Assn Inc	\$30,000.00	\$30,000.00	\$30,000.00
		9030751	Manawatu Golf Club Inc	\$8,500.00	\$4,000.00	\$4,000.00
		9031826	Manawatu Mountain Bike Club Inc	\$125,000.00	\$100,000.00	\$100,000.00
		9031242	Manawatu Paraplegic & Physically Disabled Assn Inc	\$19,171.09	\$15,000.00	\$15,000.00
		9029268	Manawatu Pony Club Inc	\$3,912.00	\$3,912.00	\$3,912.00
		9029667	Manawatu Striders Inc	\$5,009.00	\$4,866.00	\$4,866.00
		9030507	Marist Tennis Club	\$3,800.00	\$1,600.00	\$1,600.00
		9031450	Massey University Football Club Inc	\$30,654.50	\$30,095.00	\$30,095.00
		9031244	Netball Manawatu Centre Inc	\$21,323.00	\$21,323.00	\$21,323.00
		9030297	Northern Club (Manawatu) Inc	\$25,000.00	\$5,000.00	\$5,000.00
		9030196	OnBoard Skate Inc	\$76,967.00	\$60,000.00	\$60,000.00
		9031436	P N HSOB Junior Rugby Club Inc	\$5,800.00	\$5,800.00	\$5,800.00
		9030651	PN Marist Football Club Inc	\$40,000.00	\$16,000.00	\$16,000.00
		9031360	Snapback Gym Inc	\$17,689.00	\$17,689.00	\$17,689.00
		9029730	Special Olympics Manawatu	\$10,000.00	\$10,000.00	\$10,000.00
		9031159	Takaro Assn Football Club Inc	\$26,619.00	\$6,000.00	\$6,000.00
		9029139	Thistle Caledonian Soc Inc	\$2,406.00	\$2,406.00	\$2,406.00
		9029046	United Cricket Club Inc	\$4,000.00	\$4,000.00	\$4,000.00
	<b>Subtotal</b>					\$387,147.00
		24				
<b>Subtotal</b>						\$942,359.00
		61				
Wellington City Council	Community - Culture - Arts	9031282	Kidz Need Dadz Charitable Trust Wellington Inc	\$37,128.21	\$5,000.00	\$20,000.00
	<b>Subtotal</b>					\$20,000.00
		1				

## 44-17

	Health	9029944	Muscular Dystrophy Association (Tuaatara/Central Region)	\$17,234.00	\$6,308.00	\$16,308.00
	Subtotal					\$16,308.00
		1				
	Sport	9030738	N Z Cricket Museum	\$81,393.35	\$10,000.00	\$35,000.00
	Subtotal					\$35,000.00
		1				
Subtotal						\$71,308.00
		3				
Whakatane District Council	Health	9030458	Order of St John Central Region Trust Board	\$191,286.00	\$191,286.00	\$191,286.00
	Subtotal					\$191,286.00
		1				
Subtotal						\$191,286.00
		1				
Total						\$1,583,452.00
		79				

**SCHEDULE TWO** Approved Grants - Payments by TLA

As of 2023-07-06 13:54:19 New Zealand Standard Time/NZST • Generated by Sam Alexander • Sorted by Grant Request: Organisation Name (Ascending)

Filtered By

Show: All tabs

Date Field: Payment Date equals Custom (1/04/2021 to 31/03/2022)

Allocated Amount greater or equal 1

TLA ID equals 48

Grant Request: Org TLA ↑	Grant Request: Category ↑	Grant Request Number	Grant Request: Organisation Name	Amount Requested	Allocated Amount	Final Granted Amount
Auckland City Council	Community - Culture - Arts	9033088	Living Theatre Charitable Trust	\$8,490.31	\$2,122.00	\$8,490.00
	Subtotal					\$8,490.00
		1				
Subtotal		1				\$8,490.00
Christchurch City Council	Health	9035263	Southern Hearing Charitable Trust	\$100,000.00	\$7,500.00	\$70,000.00
	Subtotal					\$70,000.00
		1				
Subtotal		1				\$70,000.00
Horowhenua District Council	Health	9035232	Age Concern (Horowhenua) Inc	\$15,000.00	\$12,130.00	\$12,130.00
	Subtotal					\$12,130.00
		1				
Subtotal		1				\$12,130.00
LF National	Community - Culture - Arts	9032706	Bandquest Charitable Trust	\$30,000.00	\$5,000.00	\$20,000.00
		9034659	Good Bitches Trust	\$30,000.00	\$10,000.00	\$30,000.00
	Subtotal					\$50,000.00
		2				
	Education	9033676	Momentum Charitable Trust	\$99,830.00	\$5,000.00	\$10,000.00
		9034703	Zeal Education Trust	\$145,000.00	\$10,000.00	\$40,000.00
	Subtotal					\$50,000.00
		2				
	Health	9035018	Breast Cancer Foundation N Z	\$150,000.00	\$15,000.00	\$100,000.00
		9034708	Breast Cancer Support Inc	\$10,000.00	\$2,500.00	\$10,000.00
		9033776	Cure Kids	\$40,000.00	\$6,250.00	\$25,000.00
		9034884	Diabetes N Z Inc	\$95,000.00	\$15,000.00	\$45,000.00
		9034169	Heart Kids N Z Inc	\$225,000.00	\$15,000.00	\$150,000.00

## 44-19

		9033820	Immune Deficiencies Foundation of N Z (I D F N Z) Inc	\$30,000.00	\$5,000.00	\$30,000.00
		9034790	N Z Down Syndrome Assn Inc	\$25,044.60	\$6,000.00	\$20,000.00
		9032122	Parkinsons of N Z Charitable Trust	\$280,497.16	\$10,000.00	\$228,000.00
	Subtotal					\$608,000.00
		8				
	Sport	9033171	N Z School Cycling Assn Inc	\$10,000.00	\$2,500.00	\$10,000.00
		9032677	Special Olympics N Z	\$203,643.49	\$5,000.00	\$145,000.00
	Subtotal					\$155,000.00
		2				
Subtotal						\$863,000.00
		14				
Manawatu District Council	Community - Culture - Arts	9035043	Moneywise Manawatu	\$27,206.00	\$10,000.00	\$10,000.00
	Subtotal					\$10,000.00
		1				
Subtotal						\$10,000.00
		1				
Mt Wellington Licensing Trust	Community - Culture - Arts	9033485	Blue Light Ventures Inc	\$245,927.68	\$6,250.00	\$80,000.00
	Subtotal					\$80,000.00
		1				
Subtotal						\$80,000.00
		1				
Napier City Council	Sport	9034140	No 4 District Fed of N Z Football T/A Central Football Inc	\$37,000.00	\$7,500.00	\$15,000.00
	Subtotal					\$15,000.00
		1				
Subtotal						\$15,000.00
		1				
New Plymouth District Council	Sport	9034337	Triathlon N Z Inc	\$100,263.72	\$5,000.00	\$30,000.00
	Subtotal					\$30,000.00
		1				
Subtotal						\$30,000.00
		1				
Palmerston North City Council	Community - Culture - Arts	9033877	Alliance Francaise de Palmerston North Inc	\$20,881.75	\$6,000.00	\$6,000.00
		9032626	City Mission Palmerston North	\$15,000.00	\$15,000.00	\$15,000.00
		9032405	Community Arts Palmerston North	\$11,822.89	\$8,000.00	\$8,000.00
		9034932	Legacy Centre	\$51,774.23	\$50,000.00	\$50,000.00
		9034217	Manawatu Access Radio Charitable Trust	\$10,000.00	\$10,000.00	\$10,000.00
		9033199	Manawatu Concert Band Inc	\$3,828.85	\$3,700.00	\$3,700.00
		9034813	Manawatu Lesbian & Gay Rights Assn Inc	\$30,739.20	\$3,350.00	\$3,350.00
		9032577	Manawatu Multicultural Council Inc.	\$9,000.00	\$9,000.00	\$9,000.00

## 44-20

		9035493	Manawatu Performing Arts Competition Soc Inc	\$6,280.00	\$6,000.00	\$6,000.00
		9032957	Manawatu Scottish Pipe Band Inc	\$10,154.00	\$9,000.00	\$9,000.00
		9032697	Manawatu Scottish Soc of N Z Inc	\$5,443.75	\$3,000.00	\$3,000.00
		9034598	Palmerston North City Council	\$13,285.00	\$11,552.00	\$11,552.00
		9032255	Palmerston North Dance Assn Inc	\$19,659.25	\$10,000.00	\$10,000.00
		9032816	Palmerston North Methodist Social Services Trust	\$5,000.00	\$2,900.00	\$2,900.00
		9034646	Palmerston North Operatic Soc Inc	\$18,915.00	\$18,915.00	\$18,915.00
		9032380	Palmerston North Street Van Inc	\$6,000.00	\$4,000.00	\$4,000.00
		9034085	Performing Arts Competitions Assn of N Z Inc	\$20,000.00	\$15,000.00	\$15,000.00
		9033891	Piping & Dancing Assn of N Z Inc - Wellington Centre	\$4,674.63	\$4,675.00	\$4,675.00
		9033654	R N Z S P C A - Palmerston North	\$9,398.00	\$8,000.00	\$8,000.00
		9034455	Samaritans Manawatu Inc	\$10,000.00	\$8,000.00	\$8,000.00
		9034872	Te Manawa Museums Trust	\$10,000.00	\$10,000.00	\$10,000.00
	Subtotal					\$216,092.00
	21					
Education		9035002	Awapuni School (Palmerston North)	\$23,947.70	\$10,000.00	\$10,000.00
		9033884	Carncot Independent School	\$10,000.00	\$8,000.00	\$8,000.00
		9032467	Digits Charitable Trust	\$10,367.00	\$5,000.00	\$5,000.00
		9034870	iHow Charitable Trust	\$18,902.00	\$10,000.00	\$10,000.00
		9034705	Kopane School	\$10,000.00	\$10,000.00	\$10,000.00
		9034724	Learning and Growing Together Trust	\$14,976.00	\$14,976.00	\$14,976.00
		9033132	Life Education Trust Manawatu	\$10,456.24	\$5,476.00	\$5,476.00
		9032400	MentorEd Charitable Trust	\$18,274.14	\$15,000.00	\$15,000.00
		9032942	Milson School	\$3,351.29	\$2,377.00	\$2,377.00
		9034529	Palmerston North Parents Centre	\$4,599.99	\$4,600.00	\$4,600.00
		9032767	Roslyn School	\$10,274.00	\$8,000.00	\$8,000.00
		9031398	S A N Z - Camp Kilsby	\$4,500.00	\$4,500.00	\$4,500.00
		9034616	SPELADD N Z Inc	\$7,200.00	\$7,000.00	\$7,000.00
		9033668	St Peters College - Palmerston North	\$38,000.00	\$25,000.00	\$25,000.00
		9031392	Terrace End Playcentre	\$8,940.20	\$6,000.00	\$6,000.00
		9034696	Whakarongo School	\$37,900.00	\$33,000.00	\$33,000.00
	Subtotal					\$168,929.00
	16					
Health		9033288	Age Concern N Z Palmerston North & Districts Branch Inc	\$4,500.00	\$4,319.00	\$4,319.00
		9034119	Alzheimers Soc Manawatu Inc	\$50,000.00	\$30,000.00	\$30,000.00
		9032556	Arohanui Hospice Service Trust	\$26,795.59	\$26,000.00	\$26,000.00

## 44-21

		9035497	Brain Injury Assn Central Districts Inc	\$19,825.00	\$10,000.00	\$10,000.00
		9032145	Cancer Soc of N Z Manawatu Centre Inc	\$6,250.00	\$6,250.00	\$6,250.00
		9032748	CCS Disability Action Manawatu / Horowhenua Inc	\$4,500.00	\$4,500.00	\$4,500.00
		9034801	Manawatu Horowhenua and Tararua Diabetes Trust	\$20,000.00	\$20,000.00	\$20,000.00
		9034431	Supporting Families in Mental Illness Manawatu Inc	\$30,000.00	\$25,000.00	\$25,000.00
		9034364	Te Hā o Hine-ahu-one Palmerston North Womens Health Collective Inc	\$8,085.00	\$8,000.00	\$8,000.00
		9032085	Youthline Central North Island Inc	\$78,195.00	\$50,000.00	\$50,000.00
	Subtotal					\$184,069.00
		10				
	Sport	9032074	Ashhurst Pohangina Squash Club	\$4,592.70	\$4,500.00	\$4,500.00
		9033270	Bike Manawatu Inc	\$5,790.00	\$5,790.00	\$5,790.00
		9033518	Bowls Manawatu Inc	\$25,000.00	\$15,000.00	\$15,000.00
		9035074	Bowls Palmerston North Inc	\$15,252.00	\$15,000.00	\$15,000.00
		9032662	College Old Boys Rugby Football Club Inc	\$16,795.37	\$15,000.00	\$15,000.00
		9032329	Freyberg Old Boys Rugby Football Club Inc	\$18,126.09	\$8,000.00	\$8,000.00
		9033701	Hockey Manawatu Inc	\$50,000.00	\$30,000.00	\$30,000.00
		9033415	Manawatu Badminton Assn Inc	\$39,425.74	\$35,000.00	\$35,000.00
		9034733	Manawatu Cricket Assn Inc	\$30,000.00	\$30,000.00	\$30,000.00
		9034060	Manawatu GymSports Incorporated	\$9,383.34	\$8,000.00	\$8,000.00
		9032404	Manawatu Rugby Football Union Inc	\$138,073.00	\$39,000.00	\$60,000.00
		9032650	Manawatu Volleyball Club Inc	\$35,409.00	\$20,000.00	\$20,000.00
		9034412	Marist Club PN Inc	\$13,857.00	\$12,000.00	\$12,000.00
		9035328	Massey University Football Club Inc	\$40,772.10	\$10,000.00	\$10,000.00
		9035205	Netball Manawatu Centre Inc	\$51,139.13	\$30,000.00	\$30,000.00
		9035520	OnBoard Skate Inc	\$65,102.00	\$20,000.00	\$20,000.00
		9032509	Palmerston North Jets Basketball Inc	\$40,000.00	\$30,000.00	\$30,000.00
		9035075	Palmerston North Squash Club Inc	\$109,675.00	\$55,000.00	\$55,000.00
		9035125	P N HSOB Junior Rugby Club Inc	\$5,800.00	\$5,800.00	\$5,800.00
		9034432	PN Marist Football Club Inc	\$24,838.00	\$20,000.00	\$20,000.00
		9031554	Red Sox Sports Club Inc	\$52,958.89	\$15,000.00	\$15,000.00
		9033353	Special Olympics Manawatu	\$25,728.00	\$25,728.00	\$25,728.00
		9032727	United Cricket Club Inc	\$6,000.00	\$6,000.00	\$6,000.00
	Subtotal					\$475,818.00
		23				
Subtotal						\$1,044,908.00
		70				
Rangitikei District Council	Health	9032520	Rangitikei Voluntary Rural Fire Force	\$35,000.00	\$15,000.00	\$35,000.00



**44-22**

	Subtotal					\$35,000.00
		1				
Subtotal						\$35,000.00
		1				
Rotorua District Council	Sport	9034668	Maori Basketball N Z Inc	\$46,250.00	\$5,000.00	\$10,000.00
	Subtotal					\$10,000.00
		1				
Subtotal						\$10,000.00
		1				
Tauranga City Council	Community - Culture - Arts	9034929	Opus Orchestra Trust Inc	\$40,000.00	\$5,000.00	\$30,000.00
	Subtotal					\$30,000.00
		1				
Subtotal						\$30,000.00
		1				
Wellington City Council	Health	9034555	The Rare Disorders New Zealand Trust	\$25,000.00	\$5,000.00	\$15,000.00
	Subtotal					\$15,000.00
		1				
Subtotal						\$15,000.00
		1				
Total						\$2,223,528.00
		95				

**SCHEDULE THREE** Approved Grants - Payments by TLA

As of 2023-07-06 13:55:40 New Zealand Standard Time/NZST • Generated by Sam Alexander • Sorted by Grant Request: Organisation Name (Ascending)

Filtered By

Show: All tlas

Date Field: Payment Date equals Custom (1/04/2022 to 31/03/2023)

Allocated Amount greater or equal 1

TLA ID equals 48

Grant Request: Org TLA ↑	Grant Request: Category ↑	Grant Request Number	Grant Request: Organisation Name	Amount Requested	Allocated Amount	Final Granted Amount
Auckland City Council	Community - Culture - Arts	9039449	Garden to Table Trust	\$50,000.00	\$1,875.00	\$15,000.00
		9039774	Living Theatre Charitable Trust	\$8,400.00	\$2,100.00	\$8,400.00
		9039532	Youth Arts New Zealand	\$75,000.00	\$5,500.00	\$50,000.00
	Subtotal					\$73,400.00
		3				
	Education	9036124	Teach First New Zealand Trust	\$15,833.00	\$2,500.00	\$8,750.00
	Subtotal					\$8,750.00
		1				
Subtotal						\$82,150.00
		4				
Horowhenua District Council	Community - Culture - Arts	9039101	Age Concern (Horowhenua) Inc	\$15,000.00	\$10,000.00	\$10,000.00
	Subtotal					\$10,000.00
		1				
Subtotal						\$10,000.00
		1				
LF National	Community - Culture - Arts	9037062	Bandquest Charitable Trust	\$35,000.00	\$2,500.00	\$20,000.00
		9037109	Chamber Music New Zealand Trust Board	\$20,000.00	\$2,000.00	\$20,000.00
		9036240	Rock Quest Charitable Trust	\$90,000.00	\$2,500.00	\$20,000.00
	Subtotal					\$60,000.00
		3				
	Health	9038260	Anxiety New Zealand Trust (Anxiety NZ)	\$38,000.00	\$5,000.00	\$20,000.00
		9039803	Aphasia N Z (AphasiaNZ) Charitable Trust	\$50,000.00	\$5,000.00	\$20,000.00
		9039453	Breast Cancer Foundation N Z	\$150,000.00	\$5,000.00	\$78,750.00
		9037842	Coeliac N Z Inc	\$30,000.00	\$6,250.00	\$25,000.00
		9038894	Heart Kids N Z Inc	\$300,000.00	\$5,000.00	\$160,000.00
		9037428	Hospice N Z Inc	\$5,500.00	\$1,375.00	\$4,125.00
		9039735	N Z Council of Victim Support Groups Inc	\$50,000.00	\$1,500.00	\$20,000.00
		9039846	N Z Land Search & Rescue Inc	\$200,000.00	\$15,000.00	\$100,000.00
		9039088	Prostate Cancer Foundation of NZ Inc	\$75,000.00	\$5,000.00	\$40,000.00

## 44-24

	Subtotal					\$467,875.00
		9				
	Sport	9038502	Motorcycling N Z Inc	\$68,075.00	\$2,500.00	\$15,000.00
		9037296	MotorSport N Z Inc	\$60,000.00	\$2,500.00	\$5,000.00
		9037783	N Z Golf Inc	\$259,650.00	\$25,000.00	\$95,000.00
		9039779	N Z Softball Assn Inc	\$60,000.00	\$5,000.00	\$40,000.00
		9038859	Olympic Weightlifting N Z Inc	\$30,000.00	\$2,500.00	\$10,000.00
	Subtotal					\$165,000.00
		5				
Subtotal						\$692,875.00
		17				
Manawatu District Council	Sport	9038865	Manawatu Orion Motorcycle Club	\$12,000.00	\$5,000.00	\$10,000.00
	Subtotal					\$10,000.00
		1				
Subtotal						\$10,000.00
		1				
North Shore City Council	Sport	9039665	Boccia N Z Inc	\$9,999.60	\$1,500.00	\$10,000.00
	Subtotal					\$10,000.00
		1				
Subtotal						\$10,000.00
		1				
Palmerston North City Council		9039519	Green Hub Trust	\$7,910.34	\$5,000.00	\$5,000.00
		9038777	Te Araroa Manawatu Trust	\$2,500.00	\$2,500.00	\$2,500.00
		9038741	Te Hā o Hine-ahu-one Palmerston North Womens Health Collective Inc	\$7,957.45	\$5,103.00	\$5,103.00
	Subtotal					\$12,603.00
		3				
	Community - Culture - Arts	9037318	Abbeyfield Palmerston North Inc	\$10,000.00	\$10,000.00	\$10,000.00
		9037438	Alliance Francaise de Palmerston North Inc	\$28,374.11	\$10,000.00	\$10,000.00
		9039430	Alzheimers Soc Manawatu Inc	\$45,000.00	\$20,000.00	\$25,000.00
		9039421	Arohanui Hospice Service Trust	\$51,823.80	\$5,000.00	\$10,000.00
		9039090	Big Brothers Big Sisters of Manawatu	\$10,000.00	\$5,546.00	\$5,546.00
		9038897	Birthright Central Inc	\$10,000.00	\$10,000.00	\$10,000.00
		9039556	Cancer Soc of N Z Manawatu Centre Inc	\$9,165.42	\$6,000.00	\$6,000.00
		9039816	Digits Charitable Trust	\$4,128.27	\$1,028.00	\$1,028.00
		9035846	Grey Power Manawatu Inc	\$6,000.00	\$4,000.00	\$4,000.00
		9039062	Learning and Growing Together Trust	\$14,976.00	\$14,000.00	\$14,000.00
		9039352	Legacy Centre	\$57,785.51	\$30,000.00	\$30,000.00
		9035230	Legacy Housing	\$39,990.00	\$8,774.00	\$34,774.00
		9037173	Legacy Property Group	\$28,591.24	\$10,000.00	\$10,000.00
		9037527	Life Education Trust Manawatu	\$8,346.38	\$4,546.00	\$4,546.00
		9038818	Manawatu Access Radio Charitable Trust	\$10,000.00	\$10,000.00	\$10,000.00
		9038326	Manawatu Scottish Pipe Band Inc	\$11,562.13	\$10,000.00	\$10,000.00

## 44-25

	9037288	Manawatu Scottish Soc of N Z Inc	\$13,570.00	\$3,000.00	\$3,000.00
	9037877	Manawatu Striders Inc	\$1,350.00	\$1,350.00	\$1,350.00
	9036009	Manawatu Tenants Union Inc	\$6,303.90	\$4,000.00	\$4,000.00
	9035291	NZ Machine Knitters Soc Inc - Manawatu	\$2,500.00	\$2,000.00	\$2,000.00
	9038292	Palmerston North Brass Band Inc	\$46,716.00	\$20,000.00	\$20,000.00
	9036735	Palmerston North City Neighbourhood Support Groups Inc	\$10,000.00	\$5,000.00	\$5,000.00
	9036999	Palmerston North Dance Assn Inc	\$10,000.00	\$10,000.00	\$10,000.00
	9038168	Palmerston North Methodist Social Services Trust	\$15,000.00	\$10,000.00	\$10,000.00
	9038617	Palmerston North Parents Centre	\$9,199.98	\$6,000.00	\$6,000.00
	9037485	Palmerston North Street Van Inc	\$6,000.00	\$3,945.00	\$3,945.00
	9037980	Palmerston North Theatre Trust Inc	\$10,000.00	\$10,000.00	\$10,000.00
	9037983	Parentline Manawatu Inc	\$30,000.00	\$10,000.00	\$10,000.00
	9037723	Performing Arts Competitions Assn of N Z Inc	\$20,000.00	\$19,871.00	\$19,871.00
	9038249	Plant to Plate Aotearoa	\$5,000.00	\$5,000.00	\$5,000.00
	9038864	SPELADD N Z Inc	\$7,200.00	\$7,000.00	\$7,000.00
	9038860	St Peters Anglican Church	\$9,000.00	\$5,000.00	\$5,000.00
	9038462	Supporting Families in Mental Illness Manawatu Inc	\$35,000.00	\$25,000.00	\$25,000.00
	9037681	Te Roopu Oranga O Highbury	\$5,000.00	\$5,000.00	\$5,000.00
Subtotal					\$347,060.00
	34				
Education	9035979	Central Normal School	\$4,794.35	\$4,169.00	\$4,169.00
	9036703	Kairanga School	\$3,390.00	\$2,000.00	\$2,000.00
	9035937	MentorEd Charitable Trust	\$15,000.00	\$15,000.00	\$15,000.00
	9038689	Monrad Intermediate School	\$10,000.00	\$5,000.00	\$5,000.00
	9035794	N Z P F - Milson Playcentre	\$6,325.50	\$2,500.00	\$2,500.00
	9037187	Palmerston North Boys High School	\$17,420.00	\$10,000.00	\$10,000.00
	9037168	Roslyn School	\$9,565.56	\$8,536.00	\$8,536.00
	9033458	Work Manawatu	\$24,000.00	\$15,000.00	\$15,000.00
Subtotal					\$62,205.00
	8				
Health	9036662	CCS Disability Action Manawatu / Horowhenua Inc	\$5,000.00	\$5,000.00	\$5,000.00
	9036440	LUCK	\$47,145.00	\$10,000.00	\$10,000.00
	9035465	Manawatu Deaf Soc Inc	\$5,000.00	\$4,000.00	\$4,000.00
	9038534	Manawatu Horowhenua and Tararua Diabetes Trust	\$20,000.00	\$10,000.00	\$20,000.00
	9035749	Royal N Z Foundation of the Blind	\$20,000.00	\$15,000.00	\$15,000.00
Subtotal					\$54,000.00
	5				
Sport	9037273	Bike Manawatu Inc	\$11,373.45	\$6,000.00	\$6,000.00

## 44-26

		9037038	Bowls Manawatu Inc	\$25,000.00	\$15,000.00	\$15,000.00
		9039636	Bowls Palmerston North Inc	\$15,041.25	\$9,000.00	\$9,000.00
		9039297	Bunnythorpe Rugby Football Club Inc	\$4,640.00	\$2,500.00	\$2,500.00
		9036258	College Old Boys Rugby Football Club Inc	\$19,695.50	\$15,000.00	\$15,000.00
		9037635	Freyberg Cricket Club Incorporated	\$7,935.00	\$5,000.00	\$5,000.00
		9035839	Freyberg Old Boys Rugby Football Club Inc	\$14,048.70	\$10,000.00	\$10,000.00
		9038208	Greasy Chain Charitable Trust	\$4,458.91	\$4,035.00	\$4,035.00
		9038288	Hockey Manawatu Inc	\$40,000.00	\$30,000.00	\$30,000.00
		9035441	Kartsport Manawatu Inc	\$15,000.00	\$5,000.00	\$5,000.00
		9039961	Kartsport Manawatu Inc	\$20,451.78	\$5,000.00	\$5,000.00
		9038514	Manawatu Badminton Assn Inc	\$57,840.94	\$35,000.00	\$35,000.00
		9039607	Manawatu Cricket Assn Inc	\$29,686.00	\$4,000.00	\$11,500.00
		9036982	Manawatu Golf Club Inc	\$20,000.00	\$10,000.00	\$10,000.00
		9038084	Manawatu GymSports Incorporated	\$15,240.00	\$8,000.00	\$8,000.00
		9038880	Manawatu Mountain Bike Club Inc	\$100,000.00	\$50,000.00	\$50,000.00
		9036530	Manawatu Rugby Football Union Inc	\$102,250.00	\$50,000.00	\$50,000.00
		9039163	Manawatu Softball Assn Inc	\$25,000.00	\$20,000.00	\$20,000.00
		9038075	Marist Club PN Inc	\$3,800.00	\$3,800.00	\$3,800.00
		9039701	Netball Manawatu Centre Inc	\$48,800.00	\$10,000.00	\$10,000.00
		9038552	Old Boys Cricket Club (Palmerston North) Inc	\$7,124.25	\$5,000.00	\$5,000.00
		9035686	Palmerston North End A F C Inc	\$9,860.86	\$5,000.00	\$5,000.00
		9036700	Palmerston North Golf Club Inc	\$20,000.00	\$10,000.00	\$10,000.00
		9037134	Palmerston North Intermediate Normal School	\$9,100.00	\$4,300.00	\$4,300.00
		9039690	PN Marist Football Club Inc	\$28,248.00	\$15,000.00	\$15,000.00
		9036627	Red Sox Sports Club Inc	\$37,010.34	\$15,000.00	\$15,000.00
		9038402	Snapback Gym Inc	\$40,000.00	\$20,000.00	\$20,000.00
		9037211	Special Olympics Manawatu	\$10,890.00	\$8,484.00	\$8,484.00
		9035970	Takaro Assn Football Club Inc	\$16,601.41	\$10,000.00	\$10,000.00
		9036114	Takaro Sports Club Inc	\$20,000.00	\$20,000.00	\$20,000.00
		9036469	United Cricket Club Inc	\$6,000.00	\$5,000.00	\$5,000.00
	Subtotal					\$422,619.00
		31				
Subtotal						\$898,487.00
		81				
Porirua City Council	Education	9036453	La Leche League N Z Inc	\$55,218.61	\$2,000.00	\$4,000.00
	Subtotal					\$4,000.00
		1				
Subtotal						\$4,000.00
		1				
Rotorua District Council	Community - Culture - Arts	9039802	Get Kids Active Charitable Trust	\$62,076.00	\$3,000.00	\$35,000.00
	Subtotal					\$35,000.00
		1				
Subtotal						\$35,000.00

44-27

		1				
Tauranga City Council	Education	9038369	House of Science N Z Charitable Trust	\$32,000.00	\$7,500.00	\$20,000.00
	Subtotal					\$20,000.00
		1				
Subtotal						\$20,000.00
		1				
Wellington City Council	Sport	9037209	Special Olympics NZ - Lower North Island Regional	\$25,000.00	\$10,000.00	\$20,000.00
	Subtotal					\$20,000.00
		1				
Subtotal						\$20,000.00
		1				
Total						\$1,782,512.00
		109				

**SCHEDULE FOUR** Approved Grants - Payments by TLA

As of 2023-07-06 13:57:01 New Zealand Standard Time/NZST • Generated by Sam Alexander • Sorted by Grant Request: Organisation Name (Ascending)

Filtered By  
Show: All tlas  
Date Field: Payment Date equals Custom (1/04/2023 to 6/07/2023)  
Allocated Amount greater or equal 1  
TLA ID equals 48

Grant Request: Org TLA ↑	Grant Request: Category ↑	Grant Request: Grant Request Number	Grant Request: Organisation Name	Amount Requested	Allocated Amount	Final Granted Amount
Horowhenua District Council	Community - Culture - Arts	9039059	The Pipes and Drums of Palmerston North and Districts Inc	\$3,373.33	\$2,865.00	\$2,865.00
	Subtotal					\$2,865.00
		1				
Subtotal						\$2,865.00
LF National	Community - Culture - Arts	9040785	Meat the Need	\$40,000.00	\$7,500.00	\$30,000.00
	Subtotal					\$30,000.00
		1				
	Health	9040481	Parkinsons of N Z Charitable Trust	\$192,119.80	\$10,000.00	\$100,000.00
	Subtotal					\$100,000.00
		1				
Subtotal						\$130,000.00
Palmerston North City Council						
		9040738	Manawatu Performing Arts Competition Soc Inc	\$4,380.00	\$4,047.00	\$4,047.00
		9040114	Manawatu Rugby Football Union Inc	\$78,572.91	\$35,000.00	\$40,000.00
		9041170	St Peters College - Palmerston North	\$15,000.00	\$10,000.00	\$10,000.00
	Subtotal					\$54,047.00
			3			
	Community - Culture - Arts	9041133	CCS Disability Action Manawatu / Horowhenua Inc	\$4,200.00	\$4,200.00	\$4,200.00
		9040474	Community Fruit Harvest Manawatu	\$47,021.00	\$15,000.00	\$15,000.00
		9040724	Palmerston North Bridge Club Inc	\$2,470.00	\$1,616.00	\$1,616.00
		9039974	Te Manawa Family Services Charitable Trust	\$15,000.00	\$10,000.00	\$10,000.00
		9040950	Te Manawa Museums Trust	\$50,000.00	\$40,000.00	\$40,000.00
		9038755	The Free Store Charitable Trust	\$9,074.00	\$5,250.00	\$5,250.00
		Subtotal				
			6			
	Education	9040300	Awapuni School (Palmerston North)	\$19,500.00	\$19,500.00	\$19,500.00
		9041428	Terrace End Playcentre	\$9,940.36	\$6,000.00	\$6,000.00
	Subtotal					\$25,500.00
			2			
	Health	9040279	Brain Injury Assn Central Districts Inc	\$9,750.00	\$10,000.00	\$10,000.00
Subtotal					\$10,000.00	
		1				

44-29

	Sport	9040665	Freyberg Old Boys Rugby Football Club Inc	\$14,907.17	\$10,000.00	\$10,000.00
		9040381	Massey University Football Club Inc	\$17,250.00	\$10,000.00	\$10,000.00
		9039796	P N HSOB Junior Rugby Club Inc	\$5,000.00	\$3,500.00	\$3,500.00
		9040224	P N Marist Junior Football	\$14,356.03	\$7,000.00	\$7,000.00
		9040244	Table Tennis Manawatu Inc	\$2,250.00	\$2,250.00	\$2,250.00
	Subtotal					\$32,750.00
			5			
Subtotal						\$198,363.00
			17			
Rangitikei District Council	Sport	9040039	Huntermville Sport & Recreation Trust - Town Hall sub committee	\$20,000.00	\$15,000.00	\$15,000.00
	Subtotal					\$15,000.00
			1			
Subtotal						\$15,000.00
			1			
Total						\$346,228.00
			21			



**PGF Group Submission  
Palmerston North City Council  
Class 4 Gambling and TAB Venue Policy Review 2023**

Submitted to	Palmerston North City Council Class 4 Gambling and TAB Venue Policy Review via email submission to <a href="mailto:submission@pncc.govt.nz">submission@pncc.govt.nz</a>
Details of Submitter	Kristy Kang Policy and Public Health Manager, PGF Group <a href="mailto:kristy.kang@pgf.nz">kristy.kang@pgf.nz</a> 09 553 6896
Physical Address	Level 1, 128 Khyber Pass Road Grafton, Auckland 1023
Date of Submission	10 July 2023

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## EXECUTIVE SUMMARY

PGF Group thanks Palmerston North City Council for the opportunity to comment on the proposed changes to the Class 4 gambling and TAB venue policy.

We commend the Council's consideration of a sinking lid policy and appreciate the strong gambling harm minimisation focus. A sinking lid policy is one of the best policies available to reduce gambling losses and harm from gambling. This is a step in the right direction as 33 out of 65 councils across Aotearoa New Zealand have adopted a sinking lid policy. Of the 12 city councils in Aotearoa New Zealand, only three councils, including Palmerston North City Council, Nelson City Council, and Upper Hutt City Council, have not yet adopted a sinking lid.

Further measures can be taken to ensure a 'gold standard' sinking lid policy. A 'gold standard' policy is a sinking lid that does not permit relocations (barring the Waikiwi precedent) or club mergers. It is our view that allowing Class 4 venues to either relocate or merge undermines the efficacy of a sinking lid policy. Given this, we strongly urge the Council to consider amending clause 4.3 to this effect and including a clause that does not allow for club mergers. These changes would further highlight the Council's efforts to improve the health and wellbeing of the community.

Our submission is evidence-based and founded on what is known about gambling harm across Aotearoa New Zealand. It is time for councils and the government to take a closer look at the relationship between harmful gambling, social disparity and a funding model that enables it. Funding communities based on a system that relies on our lowest income households putting money they cannot afford to lose into gaming machines is unethical and inequitable. This disproportionately impacts Māori who generally reside in areas where the majority of these machines are situated.

We have included several of our client's stories about the gambling harm they have experienced in Palmerston North (pages 8-9). PGF also supports the submission made by Asian Family Services (AFS). We urge the Council to carefully consider the feedback that our clients and AFS have provided.

## SUBMISSION AND RECOMMENDATIONS

1. PGF Group **commends and supports** Palmerston North City Council's proposal to adopt a sinking lid policy.
2. PGF **strongly recommends** Council consider adopting a 'gold standard' sinking lid approach with a no relocation (barring the Waikiwi precedent) and no club merger provision. We urge Council to consider amending clause 4.3 to this effect and including a clause that does not allow for club mergers.
3. PGF **agrees** with the changes proposed in the TAB venue policy.

## INTRODUCTION

4. The Problem Gambling Foundation of New Zealand trades as PGF Group (PGF), the overarching brand for PGF Services, Mapu Maia Pasifika Services, and Asian Family Services.
5. PGF operate under contract to Te Whatu Ora and are funded from the gambling levy to provide clinical intervention and public health services.
6. As part of our public health work, we advocate for the development of public policy that contributes to the prevention and minimisation of gambling related harms.
7. This includes working with Territorial Local Authorities (TLAs) to encourage the adoption of policies that address community concerns regarding the density and locality of gambling venues; in this case, a sinking lid policy.

## PGF GROUP POSITION ON GAMBLING

8. It is important to note that we are not an 'anti-gambling' organisation as some may infer. We are, however, opposed to the harm caused by gambling and advocate for better protections for those most at risk of experiencing gambling harm.
9. We recognise that the majority of New Zealanders are non-problem gamblers.

10. While most New Zealanders gamble without experiencing any apparent harm, a significant minority do experience harm from their gambling, including negative impacts on their own lives and the lives of others.
11. In 2021/22, total expenditure (losses, or the amount remaining after deducting prizes and payouts from turnover) across the four main forms of gambling – Class 4 Electronic Gaming Machines (EGMs), Lotto, casinos and TAB – was more than \$2.25 billion, or \$627 for every adult (1).
12. In 2022, over \$1 billion was lost to pokies across Aotearoa New Zealand (2). This was the highest annual loss since 2003.
13. Most money spent on gambling in New Zealand comes from the relatively limited number of people who play Class 4 EGMs, and most clients accessing gambling support services cite pub/club EGMs as a primary problem gambling mode (3).

## ADVICE FOR COUNCIL DECISION MAKING

### GAMING MACHINE PROFIT (GMP) STATISTICS

14. As at 31 March 2023, there were 21 Class 4 gambling venues in Palmerston North City Council, hosting 295 EGMs between them (2).
15. Since 2015, Palmerston North City has followed the national trend of a general growth in annual GMP. The largest spike was in 2022 with approximately \$22.2 million being lost to EGMs in Palmerston North (2).
16. According to the 2018 Census, the median income in Palmerston North City is \$30,000 (4). In comparison, every machine in Palmerston North made, on average, around \$75,165 in 2022 (2). That means a pokie machine made more than \$45,000 than the average person in the district.
17. We cannot be sure why losses continue to grow while machine numbers are coming down, but what we do know is that EGM numbers are not being reduced fast enough in areas where they need to, particularly high deprivation areas.

#### CLASS 4 GAMBLING

18. The harms caused by different forms of gambling are not equal, as evidenced by the different classifications of gambling within the Gambling Act 2003.
19. Class 4 gambling – EGMs in pubs, clubs and TABs – is characterised as high-risk, high-turnover gambling, and is the most harmful form of gambling in New Zealand (3).
20. EGMs are particularly harmful because they are a form of continuous gambling (5). The short turnaround time between placing a bet and finding out whether you have won or lost, coupled with the ability to play multiple games in quick succession makes continuous gambling one of the most addictive forms of gambling available.

#### CLIENT INTERVENTION DATA

21. The Trusts and Societies who hold the licenses for the 14,464 Class 4 EGMs in New Zealand (as at 31 March 2023) (2) often submit that the relatively low number of people who seek help for a gambling problem is a positive indicator about the prevalence of harmful gambling in New Zealand. This assertion is disingenuous and should be disregarded.
22. The Ministry of Health's *Strategy to Prevent and Minimise Gambling Harm* states that "needs assessment and outcomes monitoring reports show that only 16% of potential clients for gambling support services (that is, people whose reported harm results in a moderate to high PGSI<sup>1</sup> score) actually access or present at these services", and that this low service use is also evident for other forms of addiction (3).
23. Furthermore, the Ministry of Health's Continuum of Gambling Behaviour and Harm (Figure 2) estimates the number of people experiencing mild, moderate or severe gambling harm is more than 250,000 – that's more than the population of Wellington (3).

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<sup>1</sup> The Problem Gambling Severity Index (PGSI) is commonly used to screen and categorise three levels of harm: severe or high risk (problem gambling), moderate risk and low risk.

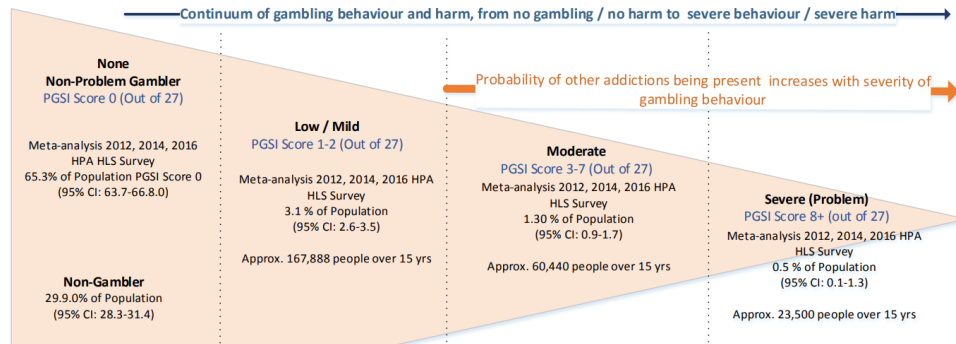


Figure 1: Continuum of Gambling Behaviour and Harm (Ministry of Health, 2019)

24. Moreover, a New Zealand gambling study estimate that 30% of EGM losses is from problem and moderate risk gamblers (6).
25. While the Ministry of Health's client intervention data is not an accurate measure of the prevalence of gambling harm in New Zealand, it can tell us the rate of harm from different classes of gambling amongst those who have sought help.
26. Data for 2021/22 shows that of the 4,534 individuals who received full intervention support for their own or someone else's gambling, 2,111 (46.6%) were for Class 4 EGMs (7).

Primary Mode	Full Interventions	Percentage
Non-Casino Gaming Machines (EGMs or Pokies)	2,111	46.6%
Lotteries Commission Products	535	11.8%
Casino Table Games (inc. Electronic)	388	8.6%
Casino Gaming Machines (EGMs or Pokies)	420	9.3%
TAB (NZ Racing Board)	394	8.7%
Housie	40	0.9%
Cards	41	0.9%
Other	605	13.3%
<b>Total</b>	<b>4,534</b>	<b>100%</b>

Table 1: 2021/22 client intervention data by primary gambling mode.

27. Given that almost half of the clients in 2020/21 sought help due to Class 4 EGMs (7), this indicates the level of harm EGMs are causing in our communities.

#### CLIENT STATEMENTS

28. PGF provides free counselling support to those experiencing gambling harm in Palmerston North.
29. Four of our clients based in Palmerston North provided statements for Council to take into consideration.
30. They have requested to stay anonymous and all identifiable information have been removed.

##### Client 1

*My gambling became a problem after I won a \$1000 jackpot. This was approximately ten years ago... I've come to realise that I use gambling as a way to help cope with my grief and trauma.*

*Unfortunately, I have become absent from my family and friends. I regularly do not attend whānau hui because I can't afford it. All my money is spent on gambling.*

*I would like Council to help restrict access to pokies – whether that can be done by reducing hours of venues or reducing the number of pokies. It would also be great to see the Council taking responsibility by helping educate the community about pokies and the harm that can be caused by pokies.*

##### Client 2

*As soon as I was old enough, I started gambling on the pokies. My mum was a gambler, so when I moved away, I played on the pokies as a way to be close to her.*

*But it's been hard... the pokies have isolated me from my family and friends. It also helps me keep my gambling a secret. I often lie to them... letting them think that I'm busy. In reality, I have been gambling and have no money left.*

*If the Council could help limit the number of pokies, or even take them away, it would help me stop gambling and help me feel less anxious, especially when I am out of the house.*



**Client 3**

*I started gambling on the pokies after I went through some major changes in my life. This was over a decade ago.*

*Gambling is normalised within my family. My dad was a gambler. Looking back, I remember he would become violent when he lost. Now, I'm a gambler too – although I'm not violent like him. I tried my best to protect my kids from gambling by going to counselling... but I've noticed that my kids have started showing an interest in the pokies too.*

*So, we're in a destructive cycle. It's costing all of us our health, our savings, and our mana.*

*My one request to Council is to make pokies less accessible. The pokies are everywhere and it's actually hard to avoid them.*

**Client 4**

*Since I was old enough to know what pokies were, I saw people playing on the pokies and some even won big. I wanted to be like them and experience the big win.*

*But it hasn't been like that for me. I've been to prison multiple times because of my gambling. I've missed numerous birthdays, Christmases, and other special events. I've lied to my family and friends countless. I abused their trust, disappointed them, and hurt them in so many ways because of my gambling.*

*Please – I would like Council to do anything and everything they can to better protect people like me from experiencing harm from the pokies.*

**ONLINE GAMBLING**

31. Online gambling is the purview of the DIA who have indicated that they will address online gambling within legislation.
32. We also note that online gambling is not within the scope of the Council's Class 4 gambling policy review.

33. In its submissions, the Gaming Machine Association of New Zealand (GMANZ) and other industry proponents suggest that an 'unintended consequence' of a reduction in physical gaming machines could be an increase in online gambling. There is no evidence that this occurs more rapidly due to a sinking lid policy.
34. Rather, the COVID-19 lockdowns have shown that while there was an increase in online gambling during lockdown (namely, MyLotto sales) (8, 9), people returned to Class 4 gambling after the lockdown. This was highlighted when the DIA saw an increase in GMP by 116% in the June to September 2020 quarter, which followed the COVID-19 lockdown in 2020 (10).

#### DENSITY OF CLASS 4 GAMBLING VENUES

35. What makes Class 4 EGMs more harmful than casino EGMs is their location within our communities and the design of EGM rooms within Class 4 venues.
36. Data published by the DIA shows that almost 61% (623 out of 1,023 as at 31 March 2023) of Class 4 gambling venues in New Zealand are located in medium-high or very-high deprivation areas (2).

Very Low Decile 1–2	Medium Low Decile 3–4	Medium Decile 5–6	Medium High Decile 7–8	Very High Decile 9–10
69	140	191	282	341

Table 2: Class 4 gambling venues as at 31 March 2023 by deprivation score.

37. In Palmerston North, 19 out of 21 (90%) Class 4 gambling venues (as at 31 March 2023) are located in medium-high and very-high deprivation areas (2).
38. A report commissioned by the Ministry of Health notes that EGMs in the most deprived areas provide over half of the total Class 4 EGM expenditure (11).

#### IMPACT OF GAMBLING HARM TO VULNERABLE POPULATION GROUPS

39. It is unethical that the majority of Class 4 EGM expenditure is coming from our lowest income households who can least afford it.

40. This is particularly concerning given that this disproportionately impacts Māori who generally live in the areas where many of these machines are situated. We note that 18.7% of Palmerston North's population are Māori (4).
41. The 2020 Health and Lifestyles Survey estimates indicated that Māori were 3.13 times more likely to be moderate-risk or problem gamblers than non-Māori and non-Pacific peoples (12).
42. Asian peoples also experience gambling harm differently. The 2018 Health and Lifestyles Survey found that Asian people's risk factor of harmful gambling was 9.5 times higher when compared with European/Other New Zealanders (13). Given that Palmerston North has a growing Asian population – making up 12.0% of Palmerston North's population according to the 2018 Census (4) – consideration around how Class 4 gambling affects vulnerable groups must be deliberated.
43. Research indicates that Māori and Asian peoples experience harmful gambling differently, and that this disparity has not diminished over the years. This is a systemic issue that is inequitable.

#### EFFICACY OF A SINKING LID

44. From a public health perspective, there's a generally held view that the easier it is to access an addictive product, the more people there are who will consume that product.
45. It follows then that stronger restrictions on the number and location of addictive products, such as EGMs, constitute a public health approach to the prevention and minimisation of gambling harm.
46. Sections 92 and 93 of the Gambling Act mandate the maximum number of pokie machines a Class 4 venue can host (18 if the venue licence was held on or before 17 October 2001, nine if the licence was granted after that date). This is the minimum regulation a TLA must implement in its Class 4 gambling policy, however many TLAs have chosen to adopt stronger regulations.
47. The Auckland University of Technology's New Zealand Work Research Institute recently published a research paper, *Capping problem gambling in New Zealand: the effectiveness of local government policy intervention*, which aimed to understand the impact of public policy interventions on problem gambling in New Zealand (14).
48. This research focussed on Class 4 gambling to assess the impact of local government interventions (absolute and per capita caps on the number of machines and/or venues and

sinking lid policies) on the number of machines/venues and the level of machine spending over the period 2010-2018.

49. Key findings from this research include:

- a. All three forms of policy intervention are effective in reducing Class 4 venues and EGMs, relative to those TLAs with no restrictions beyond those mandated by the Gambling Act.
- b. Sinking lids and per capita caps are equally the most effective at reducing machine spending.
- c. Those TLAs who adopted restrictions above and beyond those mandated by the Gambling Act experienced less gambling harm than those TLAs who have not.

#### THE FUNDING SYSTEM

50. Following the removal of tobacco funding, EGMs were introduced with the primary purpose of funding communities.
51. Trusts and Societies are required to return 40% of GMP to the community by the way of grants or applied funding. This has inextricably linked gambling harm with the survival of community groups, sports and services.
52. However, it cannot be guaranteed that the GMP lost in Palmerston North is returned to groups in Palmerston North. For example, of the \$22.2 million lost in Palmerston North in 2022 (2), around \$5.8 million was returned to organisations based in Palmerston North (15). This is only around 26% of the amount lost in 2022.
53. Moreover, the unethical nature of the funding model cannot be ignored. The *Gambling Harm Reduction Needs Assessment* (2018), prepared for the Ministry of Health, raises fundamental questions about the parity of this funding system (16).
54. Further research commissioned by the DIA revealed that there is a very strong redistributive effect from more deprived communities to less deprived communities when examining the origin of GMP and the destination of Class 4 grants (17).

55. Overall, less deprived communities (decile 1-5) provided 26% of the GMP but receive 88% of the grants. Conversely, more deprived communities (decile 6-10) provide 74% of the GMP but receive only 12% of the grants (17).

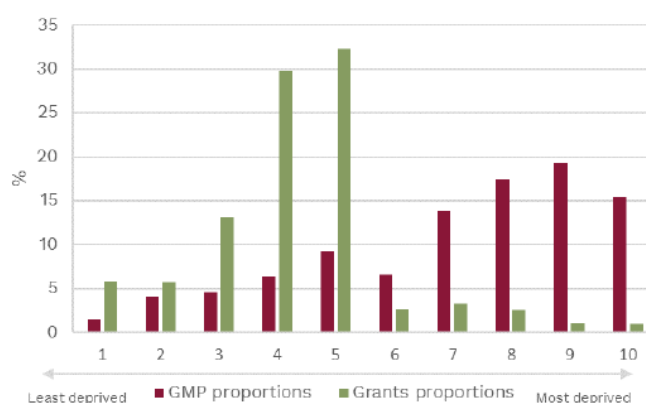


Figure 2: The origin of GMP and the destination of Class 4 grants by socio-economic decile (BERL, 2020)

56. There is a need for a transparent and sustainable funding system to support groups in our communities. This is a sentiment that is shared by other councils, including Hutt City Council, who have decided to take proactive steps to not apply for and accept Class 4 funding.

#### PRIORITISING THE PREVENTION OF HARM

57. While a sinking lid is at present the best public health approach available to TLAs to prevent and minimise gambling harm in their communities, we contend that such a policy does not go far enough – or work fast enough – to do this.

58. Several councils have already expressed their frustration at the limited opportunities available to them in their attempts to reduce the harm from Class 4 gambling in their communities.

59. We also encourage the Council to advocate to central government for the following:

- a. Adoption of a more sustainable, ethical, and transparent community funding system.
- b. More powers for councils to remove EGMs from their communities.

- c. The urgent removal of Class 4 EGMs from high deprivation areas 7-10 in New Zealand.

## CONCLUSION

- 60. The Gambling Act 2003 was enacted to provide a public health approach to the regulation of gambling and to reduce gambling harm.
- 61. A sinking lid – with no relocations or venue mergers permitted – is the best public health approach available to councils who wish to prevent and minimise gambling harm in their communities.
- 62. PGF appreciates the opportunity to make a written submission on the Council's proposed Class 4 gambling and TAB venue policy.

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17. Cox M, Hurren K, Nana G. Assessment of the effects of Class 4 gambling on Wellbeing in New Zealand: Final Report. Wellington: Business and Economic Research Limited; 2020.

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Shane
Last name	Casey
Organisation you represent	Youthline Central North Island Inc
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	Youthline Central North Island Inc supports the submission made by Pub Charities regarding the Palmerston North City Council Gambling Venue Policy Review 2023
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	



## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Tracy
Last name	Lynn
Organisation you represent	Alzheimers Society Manawatu Inc
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	Gambling in any form needs to be a choice...yes, harm may occur however it appears a sinking lid policy may make no difference. What will make a difference is the reduction in \$\$ available from grants that are vital to allow charities, sports clubs, small community organisations etc., including those that help people with gambling and other issues, to remain viable. It would be counterproductive to impose a policy that would have such a large impact.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	Concern that making it clearer equates to changing it.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Just be fair about it and remember we have choices that are slowly but surely being eroded. Pub charities bought our office chairs.....a small thing however that was \$3k we could spend on resources for our day programs.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Lin
Last name	Tozer
Organisation you represent	Dannevirke ASC
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I support this
Comments:	However, this will mean a significant reduction in the amount of available funding for sports organisations etc. How does PNCC expect to make up this shortfall for clubs in the region?
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	My only fear is that while reducing the potential harm done by gambling activities in the region, the reduction in available funding support for sporting clubs etc will be significantly reduced over time. Does PNCC have any plans to make funding opportunities available to clubs to cover this potential reduction? It is difficult to obtain any kind of funding other than from gambling bases funds, as objectionable as that might be. Financial support for sport must be considered by someone in all of this.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	David
Last name	Edge
Organisation you represent	Manawatu Jazz Club Incorporated
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I don't know/no opinion
Comments:	Though I am concerned about problem gambling, I feel that the policy adopted by The Pub Charity Ltd to raise user awareness of the problem and offer suggestions to curb excessive spending is sound. Their use of profits to provide generous funding for Community, Sports and Arts projects is exemplary and vital to the survival and development of all these organisations.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Setting spending limits, promotion of awareness of, and strategies to support those suffering from excessive gambling is vital, and has been instituted by The Pub Charity Ltd for many years. Their generous funding scheme is the mainstay of many small and large Community, Sports and Arts organisations in this difficult economic environment.
Supporting information	

50-1

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Michael
Last name	Sheridan
Organisation you represent	Palmerston North United F.C.
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	Strongly oppose, see our letter for further explanation.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	Your whole policy is intended to focus on harm minimisation, it would make complete sense to be able to relocate a premises from a deprived area to a more affluent area where it is assumed that constituents have more resources available to consume the entertainment.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	See letter attached.
Supporting information	

51-1

**Palmerston North City District Council**  
**Gambling Venue Policy Review 2023**

**Submission of Pub Charity Limited**

PO Box 27009

Wellington

Contact: Martin Cheer

Managing Director

[martin@pubcharitylimited.org.nz](mailto:martin@pubcharitylimited.org.nz)

(04) 385 6100

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## 51-2

### Policy Response

The PNCC is conducting the triennial review of its Class 4 Gambling Venue Policy for the period 2023-2025.

This will be the Councils seventh opportunity to review this policy and Council are proposing to impose a sinking lid policy and some minor changes to the relocation policy.

**There is no clear evidence presented by Council staff for proposing a change of policy to a sinking lid policy, as such Pub Charity Limited (PCL) opposes the proposed Policy and would like to speak to these submissions.**

### Relocations

Expanding the relocation provision to enable venues to move if the new location is in a lower deprivation area, to move out of residential areas, 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 Council has raised a concern about the location of venues in higher deprivation areas. The intent of the amendment to the Act allowing venue licensed to be relocated was to address exactly those concerns and allow licenses to be relocated to more commercially suited locations.

Instead, the Council is proposing to limit grounds for relocation to emergency situations like fire, flood, or public works acquisition. Making it harder or less likely to relocate a license is both counterintuitive and counterproductive.

### Consultation

Despite the Council launching the consultation process on 7 June 2023 PCL did not receive notification from the Council till 23 June 2023, by way of an email sent to a generic email address linked to grants.

I personally did not receive the email until the 26<sup>th</sup> of June. I can find no evidence of any effort to notify the over 7,000 people of Palmerston North City who play gaming machines and the many thousands who benefit from the proceeds.

These are the stakeholders who deserve to be heard. This is not a debate limited to those who operate gaming machines within the TLA and those oppose them doing so.

### Social Impact Assessment

The Council appears to be relying solely on the social impact assessment (SIA) prepared by Council staff in undertaking the cost benefit analysis that underpins the proposed change in policy. No industry input was sought on the content of the document which might have address the unconscious bias of the information it.

The SIA consistently overstates the harm associate with class 4 gambling, underreports the benefits, and overestimates the efficacy of the proposed policy. The specific error are outlined within this submission.

## 51-3

### Executive Summary

- Pub Charity Limited (PCL) currently operates a total of 5 venues and 77 gaming machines within the Palmerston North City Council TLA.
- In the 12 months from July 2022 to June 2023 PCL distributed \$2,275,266, in 154 grants benefitting the PNCC TLA.
- The SIA reports that unmonitored, uncontrolled and unsupervised online gambling is now the second highest gambling activity in New Zealand.
- Despite the amount spend on offshore websites by New Zealanders estimated to be \$650M annually, and predicted to \$1B by 2025<sup>1</sup>, the Council is proposing to impose limitations on local business from offering controlled and supervised community gambling environments that support jobs and generate grant funding and taxes.
- There is no evidence that *'limiting the availability of class 4 gambling opportunities'*, by imposing a sinking lid policy is an effective way for the Council to minimise harm from problem gambling, and Council staff offer no empirical evidence to support of the claim.
- Council reports of increased and higher than average class 4 gambling spend in Palmerston North are seriously flawed, failing to take into account, the urban demographic compared to District TLA's, inflation, the impact of COVID lockdowns on prior periods of spending, and the Governments quantitative easing over the 2020 – 2022 period which saw all retail spending increase.
- The reported increase in help seeking<sup>2</sup> in Palmerston North (for all forms of gambling) is either an error or an anomaly when compared to the national trend.
- The Te Whatu Ora reports that 56% of help seeking for gambling is for TAB, Casino and lotteries gambling. The claim by Council staff that problem gamblers are 4 x more like to be linked to Class 4 gambling<sup>3</sup> than other forms of gambling is flawed. When 'Other' forms of gambling like offshore online gambling the proportion falls even further.
- Council staff failed to utilise the Department of Internal Affairs/KPMG Local Government Gambling Policy guidelines which indicates Palmerston North is moderate/low risk.
- In the context of those who suggest a sinking lid is required;

<sup>1</sup> NZ TAB, HNZ Conference June 2023

<sup>2</sup> Palmerston North CC Social Impact Assessment, Pg 15

<sup>3</sup> Palmerston North CC Social Impact Assessment, Pg 3

## 51-4

- New Zealand has one of the lowest problem gambling rates in the world<sup>4</sup> at 0.2% of the adult population
  - Contrary to the Council's advice per capita spend on class 4 gambling in New Zealand reduced by 50% in inflation adjusted terms between 2004 – 2023 however the problem gambling prevalence rate is unchanged since the late 1990's.
  - Class 4 gambling for the overwhelming majority of the community provides a safe vehicle for entertainment, socialising, recreation, and a source of fundraising for the community. It also creates jobs and economic stimulus for local businesses.
  - Calls for a sinking lid are based on the claim of a link between reduced community access to gaming and problem gambling despite the halving of per capita exposure in NZ with no reported reduction in problem gambling prevalence in the community<sup>5</sup>.
    - *.. the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing.*<sup>6</sup>
  - Calls for a sinking lid also ignore the counter narrative of such a policy which would accelerate the existing trends towards gambling in uncontrolled and unsupervised environments like off shore online gambling which produce worse health outcomes.
  - The single largest contributor to problem gambling rates is failed treatment strategies, with AUT reporting that 2 of every 3 people scoring as problem gamblers are known in the 'system' as having received treatment in the past.
- The call for a sinking lid suggests demand outstripping supply but current gaming numbers at 295 sit 52 machines below the current cap.
  - Any suggestion that there is no risk of migration to online gambling is out of touch with clear evidence to the contrary. Anybody suggesting that class 4 venues are the main source of gambling opportunities in Palmerston North need to take a look at their mobile phones.
  - Reports from examining published grants of a rate of return of 25% are flawed. The calculation was in all likelihood based on published GMP figures which are GST inclusive. There are also 5 venues (2 x TAB & 3 x Clubs) operating 40 machines (14% of the total) that are not required to publish the application of their funds for their own use.
  - The 2021 year highlighted was also subject to substantial reductions in gross revenue from COVID lockdowns that reduced profitability.

<sup>4</sup> <http://www.health.govt.nz/publication/problem-gambling-new-zealand-preliminary-results-new-zealand-health-survey>

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

<sup>6</sup> <https://www.health.govt.nz/system/files/documents/publications/national-gambling-study-final-report-report-no-5.pdf>



**51-5**

- The Gambling Act 2003 which has a balanced set of objectives and anticipated the controlled growth, not a decline, of approved gambling like community-based gaming machines<sup>7</sup>.
- Class 4 venues must under the Gambling Act and Regulations have trained staff on duty who are obligated to intervene on witnessing signs of problem gambling and exclude persons they believe are problem gamblers.
- PCL's venues have some of the most effective harm minimisation regimes in the country.
- Research by AUT Professor Erwin quoted by Council found no evidence of a decline in problem gambling or problem gambling prevalence from sinking lids but some minor impact on expenditure on class 4 gambling which he qualified by saying (pg. 31);

*'We don't have information on other forms of gambling activity. Therefore, we don't know if the drop in [class 4 machine] spending created spillover effects such as a rise in online gambling'.*

- The DIA reports an increase in all other forms of gambling including online, as spending on class 4 has declined, while the MoH reported no corresponding reduction in problem gambling prevalence.
- Sinking lid policies have all but destroyed fundraising opportunities represented by Class 4 venues in some areas while gambling spending in the community on all the other forms of gambling with little or no local focus, like LOTTO, TAB and online gambling, increased and continues to grow.

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<sup>7</sup> S.3(a) & (c) of the Gambling Act 2003

## 51-6

### Introduction

Public Policy is by nature a balancing act between the interests of different parties. In the case of community-based gaming machines there are multiple stakeholders;

- Those that play the machines for enjoyment
- Businesses that host the machines and derive income
- People whose employment is dependent on the activity
- Community groups and their beneficiaries that received grants from the proceeds
- The general public expecting authorities to provide a safe environment
- Those that are harmed from their gambling and those that advocate for them

Empirical evidence, known for some time in the problem gambling sector, shows that there is no direct correlation between harm and exposure to gaming machine and gaming venue numbers.

The flawed ideology behind the concept encourages those opposing the presence of gaming machines in the community to suggest if a reduction in numbers is beneficial then outright prohibition is better.

Prohibition was not envisaged by the Gambling Acts 2003, quite the opposite, and such an objective sits outside of the legislated mandate.

The Gambling Commission determined as much in GC 03/07<sup>8</sup> when it found;

*'The Gambling Commission considered that the effect of the condition was to reduce gambling generally, and that it cut across what the Commission considered one of the primary purposes of the Gambling Act: to permit gambling.'*

### Sinking lids - Exposure Theory and the Prevalence of Problem Gambling

The headline of Stuff journalist Janine Rankin's, recent article reporting on the proposed sinking lid for class 4 venues stated;

## Sinking lid on pokies a meagre attempt to reduce gambling harm

Janine Rankin 05:00, May 29 2023

Sinking lids and other central government policies have reduced total expenditure on gaming machines and machine/venues numbers, and reduced grants accordingly, but despite a 50% reduction per capita in exposure problem gambling prevalence rates are unchanged because the strategy completely misses the underlying nature of the problem.

Sinking lids are a meagre attempt to reduce harm but not for the reasons that motivated Janine Rankin's Editor to post that headline.

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<sup>8</sup> The Gambling Commission, GC 03/07 *Lion Foundation v DIA*

## 51-7

While Council staff have formed the view that a sinking lid is required, based on the belief that there is a linear relationship between exposure to gaming machines and levels of problem gambling in the community, there is absolutely no evidence to support that claim and none is offered.

In fact, between the Department of Internal Affairs, the Ministry of Health, and leading problem gambling researchers we have known for many years that there is no evidence that sinking lids have had any impact on total gambling spend or problem gambling prevalence a fact recognised by researchers over the years as a false premise.<sup>9</sup>

Common sense would say a product that almost the entire adult population is aware of or exposed to, that is associated with a problem gambling prevalence rate of 0.08% (0.2% x help seeking rate of 40%) does not justify a prohibition policy on public health grounds.

With off shore online gambling spend by New Zealander's in 2023 estimated at over \$650M p.a. and forecast to exceed \$1B in the next 2 years<sup>10</sup> the control and supervision, and community returns, of a class 4 venue is vastly superior to the alternative.

It should also be noted the proposed Class 4 Gambling 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 11% of all problem gambling help seeking annually (and growing rapidly)
- NZ Racing Board on track and mobile based sports betting, associated with 7.8% of problem gambling help seeking
- Casino gambling responsible for 21% of problem gambling help seeking
- 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.

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 2023 is outdated.

The imposition of sinking lids on community gaming machines in a number of jurisdictions, including the two largest markets, Auckland and Christchurch, has led to a decline by over one third, or about 8,000, of the community gaming machines since 2004 in the New Zealand Market.

<sup>9</sup> 'Do Problem Gambling and EGM's Go Together Like a Horse and Carriage'; Abbot, M; 2006

<sup>10</sup> TAB, Hospitality New Zealand Conference, June 2023

## 51-8

Over that time total spending, in inflation adjusted terms, on community gaming machines has fallen by \$512M or 36% since 2004.

Despite this reduction in Class 4 spending the total spending on gambling in New Zealand has actually increased by over \$300M annually.

Some submitters, even those funded within the Ministry of Health framework, claim that reducing community gaming venues and machines leads to better health outcomes. This is not evident in Ministry of Health's own statistics for problem gambling prevalence rates on a national or local level.

After numerous and regular studies the NZ Ministry of Health/Te Whatu Ora states;

- *'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 has 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.<sup>11</sup>*

If historical findings 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 TLA's.

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

<sup>11</sup> 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

## 51-9

### 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 specifications, bet sizes and prizes are limited, and the issuing of credit to gamble is prohibited.

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 2003 and 2004 several Councils, 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 13 years of such policies, and a reduction of over 10,000 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.'*<sup>12</sup>

*'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/debonus](http://tab.co.nz/debonus). 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.

<sup>12</sup> NZ Racing Board CEO John Allen, Sunday Star Times, November 12, 2017

## 51-10

*'Interactive and online gambling is having devastating consequences; new gamblers are more easily recruited online and gambling sites are accessible 24 hours per day.'*<sup>13</sup>

### The Counterfactual

Class 4 gambling does not operate in a vacuum and as spending had declined on Class 4 gambling it has increased in all other formats, including online gambling. Any transition to unsupervised and uncontrolled gambling environments will be to the detriment of public health and lead to a decline in community funding, tax revenue, Problem Gambling Levy, venue payments and employment.

These risks were evident following the closures of Class 4 venues during COVID 19 lockdowns which resulted in an alarming rise in online gambling. A concern noted by the previous Minister of Internal Affairs Tracey Martin, in a television interview in 2020.

*'I can tell you we already know what would happen if we did that because when we had lockdown [COVID Level] Four we closed all Class 4 venues and what we saw was the demographic of New Zealanders who want to or need to gamble in that way shift online. So, we already know that prohibition won't stop a certain group of New Zealanders gambling in this way. ...*

*But at the moment online is literally unregulated. So, I think we have 700,000 New Zealanders who have been gambling online, two hundred and something millions of dollars gone offshore in one financial year and there is literally no regulation around it.'*<sup>14</sup>

Problem gambling providers also expressed concerns about migration to online gambling<sup>15</sup>;

## Covid-19 lockdowns causing more Pasifika to turn to online gambling

3:02 pm on 8 October 2021

Share this     



Eleisha Foon, Journalist

[@eleishafoon](#)

[eleisha.foon@rnz.co.nz](mailto:eleisha.foon@rnz.co.nz)

Concern is growing that prolonged Covid-19 lockdowns are causing an increase in online gambling within Pacific communities, according to a problem gambling support service.

Problem gambling support service Mapu Maia is reporting more people are gambling online over lockdown, and the impacts will be detrimental if government policy isn't changed to better help the most vulnerable.

<sup>13</sup> The Royal Australian & New Zealand College of Psychiatrists, September 2017

<sup>14</sup> Hon Tracey Martin, Minister of Internal Affairs, Interview Breakfast Show TV3, 26 August 2020.

<sup>15</sup> Radio New Zealand, 8 October 2021

## 51-11

Accelerating the existing trend of decline in Class 4 gambling by intentionally reducing its appeal as proposed will simply speed up the migration of gamblers to online options with inferior health outcomes and no community benefits.

Prior to the pandemic Sky City established an offshore online gambling site which saw exponential growth, described as 'exceeding expectations', when physical venues were closed.

## SkyCity reports \$22M loss in H2 amid pandemic uncertainty; online casino exceeds expectations

The business lists the performance of its **SkyCity Online Casino** as a "highlight for the period," exceeding expectations and delivering significant growth in revenue, EBITDA and customer numbers. The product was launched offshore in August 2019, and the company has seen "a significant correlation" between iGaming and lockdowns.

KiwiBank recently released data showing a trend of increasing spend on both domestic and offshore online gambling.

### KiwiBank customers spending \$30m every month playing on online gambling sites 30/03/2022

Newshub can reveal that customers of KiwiBank are spending around \$30 million every month playing on online gambling sites.

And that's just one bank's data.

It comes as Internal Affairs says a review to regulate online gambling is "ongoing", despite it being three years since the review was first announced. <sup>16</sup>

<sup>16</sup> Source: Newshub, 30 March 2022

## 51-12

### Myths About Community Based Gaming Machines

During TLA gambling policy hearings a number of false claims are consistently repeated by those who oppose gaming machines in the community and it is clear from comments made from time to time by some Councillors that these claims are given an unwarranted degree of credibility.

#### Myth #1 – Gaming machines are designed by psychologists to be addictive.

In my 16 years of industry experience, I have visited gaming design studios in Australia and the United States, and some of the world's major gaming machine manufacturers.

I am yet to meet a psychologist and I am not aware of any being employed.

Gaming machine games must meet strict technical design standards published by the State, Federal or Government Regulator for each jurisdiction.

All gaming machine games in operation in New Zealand, including all design features, pay tables graphics, must meet the Australasian Technical Standards for fairness and compliance set by the Federal Government of Australia and the Government of New Zealand administered by the Department of Internal Affairs.

The claim that gaming machines are 'designed to addict' was tested formally in a recent High Court case in the state of Victoria, Australia.

In *Guy vs Crown Melbourne Ltd No. 2 (2018) FCA 3* a player claimed that she had developed a gambling addiction as a direct consequence of the design elements of the gaming machine and that Crown Casino had failed in its duty of care to her by deploying the machines.

In dismissing the claimant's case in its entirety, the presiding Judge Justice Mortimer stated;

*"I have concluded that none of the applicant's causes of action are made out."*

As far as New Zealand is concerned the Ministry of Health reports that gambling addiction from all types of gambling affects 0.2% of the adult population and the Ministry of Health reports of that 0.2% two thirds are relapsed addicts already known to the system.

Despite over 500,000 people playing gaming machines annually the incidence rate of gambling addiction is less than 0.1% of the adult population which is one of the lowest rates in the world and of that 0.1% less than half are associated with community-based gaming machines so 1 in 2,000.

In light of the fact that the adult population has a reasonable degree of exposure to these machines in licensed premises the suggestion that an incidence of addiction of 1 in 2,000 people hardly supports the argument that they are designed to addict.

#### Myth #2 – Gaming Trusts Target the Poor

The location of potential gaming venues is not set by the licence holders like Pub Charity but by central and local Government statute, regulation and policy.

Under the current Gambling Act 2003 the only venues considered suitable for class 4 gaming were licensed premises.

The underlying thinking is these are locations already focused on an activity for persons of or over 18 years of age with staff already trained in host responsibility. In addition, the Act prohibits gambling being the primary activity of the venue so a dominant primary activity is required.



**51-13**

These regulatory restrictions mean the majority of suitable premises to host gaming machines are Taverns, Pubs and Hotels located in areas zoned commercial or mixed use.

**Myth #3 – The Proceeds Do Not Benefit the Community**

Unlike LOTTO which applies 82% of the funds its raises to national groups most Class 4 gaming societies have policies that ensure the majority (90% for PCL) of funds raised within a TLA are returned to local organisations within that TLA.

The remainder is set aside for regional and national groups.

In addition to these funding outcomes PCL and other societies were taxed over \$300M (\$30.9M for PCL) by central Government as well as paying over \$12M annually towards the costs of problem gambling research, intervention and public awareness.

On an EBITDA basis Class 4 gaming has the most efficient rate of return.

**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.

There is little risk in the PNCC retaining the current policy and proposals to further restrict relocations will prevent machines being move from higher deprivation areas.

## 51-14

**Pub Charity Limited Grant Benefitting Palmerston North TLA July 2022 - June 2023**

Date	Recipient	Purpose	Amount
22/07/2022	Carncot Private School Trust	To purchase a van for school and community use	\$8,696.00
22/07/2022	Central Normal School	We would like to install a new playground for our ORS/Special Needs Children	\$26,804.00
22/07/2022	Hockey Manawatu Incorporated	National Hockey Championship Tournament	\$26,500.00
22/07/2022	Kiwi West Aquatics Incorporated	6 months funding for Pool and lane hire at Westend Aquatics Centre.	\$15,000.00
22/07/2022	Learning and Growing Together Trust	Registration, accommodation & travel for kaiako to attend the Early Childhood Council Conference	\$4,443.00
22/07/2022	Legacy Housing	Funds of \$10,000 to be contributed towards the essential power costs of Legacy Housing.	\$10,000.00
22/07/2022	Manawatu Golf Club Incorporated	Purchase a new verti-drain renovating machine, the previous one at the end of its economic life.	\$35,000.00
22/07/2022	Manawatu Scottish Society of New Zealand Incorporated	Accommodation for judges for our pipe band competition in December.	\$2,864.00
22/07/2022	Manawatu Smallbore Rifle Association Incorporated	Hire of three Vans to transport competitors at this Years Interisland match to be hosted by the MSRA	\$2,087.00
22/07/2022	Massey University Netball Club	To encourage opportunity for our best students to play whilst minimizing costs and keeping them low	\$2,824.00
22/07/2022	Motor Neurone Disease Association of New Zealand	A contribution towards the salaries of our eight support team members.	\$30,000.00
22/07/2022	Netball New Zealand Incorporated	Travel, accommodation and venue costs for the Netball NZ Open Champs	\$30,000.00
22/07/2022	New Zealand Land Search and Rescue Incorporated	By Board resolution 24/6/22 LandSAR to apply to Pub Charity Ltd for \$250K vital national equipment	\$50,000.00
22/07/2022	New Zealand School Cycling Association Incorporated	Event costs for delivery of the 2022 National School Road Championships	\$27,000.00
22/07/2022	Palmerston North Girls' High School	NZSS Winter Tournament for badminton, netball, basketball, football and hockey.	\$30,618.06
22/07/2022	Palmerston North Intermediate Normal School	AIMS Games 2022	\$5,000.00
22/07/2022	Pukaha Mount Bruce Board	To protect the taonga species of the Pukaha forest through predator control and survey	\$70,000.00
22/07/2022	St John Palmerston North Area Committee	Cover costs to support school leavers attend a free St John Level 2, First Aid Courses	\$12,000.00
22/07/2022	Te Ha Ora the Asthma and Respiratory Foundation Charitable Trust	respiratory illness education , partial salary and operational costs.	\$5,000.00
22/07/2022	The Palmerston North Boys' High School Board of Trustees	Transportation costs for winter sport and school tournaments	\$26,724.20
22/07/2022	The Palmerston North Brass Band Incorporated	Cover costs of accomodation for a band contest in Hāwera	\$2,700.00
22/07/2022	Wellington and Central Powerlifting Association Incorporated	Venue charge for National event	\$4,421.75
26/08/2022	Anomaly Dance Group	Our dance crew of 8 girls aged 15 - 17 have qualified to represent New Zealand in Sydney Australia.	\$1,000.00

## 51-15

26/08/2022	Arohanui Hospice Service Trust	Request for funding for salaries of clinical, family support and administrative staff	\$300,000.00
26/08/2022	Digits Charitable Trust	For chromebook devices to distribute to nominated school aged children who are disadvantaged	\$9,487.00
26/08/2022	Freyberg Cricket Club Incorporated	Hirage of Manawaroa Pavillion and Manawatu Training Centre for Freyberg Cricket Club 2022/23 season	\$1,641.50
26/08/2022	Manawatu Blokart Club Incorporated	To assist with overall event costs for running Blokart World Championship and NZ Open 2022	\$2,772.00
26/08/2022	Manawatu Freshwater Anglers Club Incorporated	Purchase and transport of 750 2-year-old trout	\$4,000.00
26/08/2022	Performing Arts Competitions Association of New Zealand Incorporated	To run the MEGA+ National Young Performer Awards	\$20,000.00
26/08/2022	Special Olympics Manawatu	Registration costs for Manawatu team to attend the Summer National Games & Basketball Venue hire	\$15,716.00
26/08/2022	The Palmerston North Methodist Social Services Trust	To purchase two free standing double doors commercial freezers	\$12,290.00
26/08/2022	The Queen Elizabeth College Board of Trustees	One life and financial skills programme for Queen Elizabeth Colleges Services Academy students.	\$7,245.00
29/08/2022	Vision Community Trust	Wages for three months of Salary for the Director + Associate Director	\$20,000.00
23/09/2022	Freyberg High School	Equipment for our Ka Ora, Ka Ako/Healthy School Lunch Programme	\$23,348.00
23/09/2022	Manawatu Tramping and Skiing Club Incorporated	Payment of annual insurance premium for our ski lodge Annual insurance	\$24,421.36
23/09/2022	Manfeild Park Trust	We are seeking \$417,000 to support 8 projects that will benefit our regional community.	\$80,000.00
23/09/2022	Meehan's Boxing Club	Provide transport & accommodation for team selected to compete in National Boxing Champs Whanganui	\$3,465.00
23/09/2022	Monrad - Te Kura Waenga o Tirohanga Board of Trustees	This application is to enable each student at Monrad to participate in professional swimming lessons	\$20,412.00
23/09/2022	Old Boys Cricket Club (Palmerston North) Incorporated	Junior and Senior Training Equipment	\$13,250.00
23/09/2022	PN Marist Football Club Incorporated	Grounds Fees	\$25,000.00
23/09/2022	Takaro Association Football Club Incorporated	End of year Prizegiving for Juniors & Seniors - Players & Coaches	\$4,278.09
23/09/2022	Youthline Central North Island Incorporated	Salary for General Manager, Volunteer Coordinator Administrator and the Business Development Manager	\$57,330.00
20/10/2022	Community Choice Trust Palmerston North (Pn)	To employ a Store Manager for 16 hours/week at \$23.65/hr, to manage our volunteer staff & Op Shop	\$9,400.65
20/10/2022	Manawatu Horowhenua and Taranaki Diabetes Trust	Education programme costs	\$3,500.00
20/10/2022	NZ Rural Games Trust	Big screen hire, sound system, television production, fencing, security, first aid, caps	\$20,000.00
20/10/2022	Palmerston North Theatre Trust	Assistance with the Outreach Coordinator (community development) salary	\$10,000.00
20/10/2022	PISA INCORPORATED	Agreed to apply to cover the accommodation costs for the Under 19's team.	\$3,280.00

## 51-16

20/10/2022	She Charitable Trust	Wages to employ a coordinator	\$4,000.00
20/10/2022	Snapback Gym 'Toe A'e Se Tofa' Gym Trust	Salary Cost for ongoing community coach salary	\$10,000.00
20/10/2022	St James Catholic School (P North)	Purchase of a Replacement Shade Sail	\$3,270.00
20/10/2022	Te Roopu Oranga O Highbury Community Trust	upgrading our food storage appliances and shelving for the free food we proved the community	\$4,500.00
20/10/2022	Wanderers Cricket Club	We are a sports club, giving opportunities to as many folk who wish to play	\$1,976.74
26/10/2022	Alzheimers New Zealand Incorporated	Promote the Dementia Mate Wareware Plan, build understanding and improve care and support	\$50,000.00
22/11/2022	Ccs Disability Action Manawatu / Horowhenua Incorporated	Funding is sought toward forward-based, IT costs.	\$3,500.00
22/11/2022	Exmed For Cancer	To purchase a testing cycle ergometer that can be interfaced with an ECG and CPET	\$9,850.00
22/11/2022	Kartsport Manawatu Incorporated	Track Repairs and Crash Bag Replacement to meet H & S Standards	\$10,000.00
22/11/2022	Legacy Centre	Wages for Senior Administrator	\$8,000.00
22/11/2022	Manawatu Softball Association Incorporated	U19 Girls National Championships	\$3,676.63
22/11/2022	Manawatu Touch Association Incorporated	Support the hirage of venues, facilities and grounds in the Manawatu for Community use.	\$6,000.00
22/11/2022	Palmerston North Dance Association Incorporated	Venue and accommodation costs for PNDA Tap and Impromptu Dance Competition 17-19 February 2023	\$2,821.25
22/11/2022	The West End School (P North) Board of Trustees	15 Smart Tvs for our classroom	\$20,000.00
22/11/2022	Work Manawatu	We have secured funding for just over 2/3 of our annual lease and require funding for the remainder.	\$6,700.00
23/11/2022	Taekwondo Union Of New Zealand Incorporated	Funding for our annual Instructors Camp for our 25 member clubs from throughout New Zealand.	\$10,000.00
24/11/2022	Manawatu Regional Volleyball Association Incorporated	Venue hire for our volleyball junior programmes	\$20,000.00
24/11/2022	Palmerston North Canoe Club Incorporated	Replacement of old wooden framing and windows along the main frontage of the Canoe Club building.	\$35,000.00
24/01/2023	Alliance Francaise Palmerston North Incorporated	New library computer and equipment and two months' librarian-administrator salary	\$15,000.00
24/01/2023	Badminton Central Region Incorporated	Youth Badminton Teams participating in Inter-Regional Team Competition in Christchurch February 2023	\$15,000.00
24/01/2023	Hokowhitu School	Education outside the class room - Water Safety and beach Safety Programme	\$11,795.00
24/01/2023	Manawatu Scottish Pipe Band Incorporated	For accommodation at the National Pipe Band Championships in Christchurch	\$18,644.00
24/01/2023	Manawatu Smallbore Rifle Association Incorporated	Purchase Medals and Rep Badges	\$2,561.70
24/01/2023	Moneywise Manawātū	To buy secure filing cabinets (client info) and furniture for Financial Mentoring meeting spaces	\$12,183.88
24/01/2023	Newbury School	Swings and a sandpit	\$15,000.00
24/01/2023	Te Pae Poitarawhiti O Ikaroa Ki Te Raki	New playing uniforms required to cover all of our teams within the club.	\$5,239.00

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26/01/2023	Amputee Society of Manawatu and Districts Incorporated	4 members to attend the Amputees Federation Conference in Christchurch 14-16 April 2023.	\$3,330.00
26/01/2023	Chamber Music New Zealand Trust Board	2023 NZTrio concert tour - artist fees	\$5,000.00
26/01/2023	Kiwi West Aquatics Incorporated	6 months funding for Pool and lane hire at Westend Aquatics Centre.	\$16,350.00
26/01/2023	The Feilding and District Art Society Incorporated	Help to cover the costs of advertising nine exhibitions by guest artists in 2023.	\$2,000.00
21/02/2023	Abbeyfield Palmerston North Incorporated	To upgrade our kitchen facilities in our NFP house to include a double oven and 5 burner cooktop.	\$10,525.00
21/02/2023	Alzheimers Society Manawatu Incorporated	Replace old office chairs for staff	\$2,937.76
21/02/2023	Ashhurst Bowling Club Incorporated	Replace water tank	\$8,539.90
21/02/2023	College Old Boys Rugby Football Club Incorporated	Player rehab and physio, pre season and seasons bus hire and pre season venue hire	\$12,000.00
21/02/2023	Grey Power Manawatu Incorporated	The Association wishes to publish a newsletter to inform members.	\$5,032.56
21/02/2023	Manawatu Fourwheel Drive Club Incorporated	Costs to run a national 4wd event	\$7,646.76
21/02/2023	Manawatu Highland and National Dancing Teachers and Judges Association Incorporated	Airfares to invite Christchurch adjudicator to judge competition	\$570.00
21/02/2023	Manawatu Mountain Bike Club Incorporated	Creation of new Mountain Bike trails to extend Arapuke MTB Park as described in the 2023 Plan	\$20,000.00
21/02/2023	Manawatu Paraplegic & Physically Disabled Association Incorporated	To cover the costs of our team of young disabled members to go to the Halberg Games in Auckland	\$10,000.00
21/02/2023	Manawatu Performing Arts Competition Society Incorporated	Event venue hire. Adjudicator fees	\$5,800.00
21/02/2023	Manawatu Rugby Union Incorporated	Replacement of equipment that is near end of life, medical equipment to support participant health	\$17,724.00
21/02/2023	Northern Club (Manawatu) Incorporated	Purchase of sets of Community Twilight Bowls	\$7,300.00
21/02/2023	Onboard Skate NZ Incorporated	Instructor wages to assist with the cost of programme and event delivery	\$7,000.00
21/02/2023	Palmerston North Fire Brigade Vintage Equipment Society Incorporated	To restore a Vintage Fire Engine this Pub Charity grant will be used to purchase fundraising goods	\$1,871.57
21/02/2023	Palmerston North Street Van Incorporated	to pay for rent of the premises where our volunteers meet, before we go out on the van on s	\$10,000.00
21/02/2023	Takaro Sports Club Incorporated	To repair and paint the entire roof on the clubhouse - about 700 square metres	\$8,000.00
21/02/2023	The New Zealand Academy of Highland & National Dancing Incorporated	Funding for costumes/uniforms and transport costs for the Academy's "Highland Dance Company of NZ"	\$7,000.00
22/02/2023	Ice Breaker Aquatics Incorporated	Funding to help cover lane hire for swimming for both club and competitive swimmers	\$10,000.00
22/02/2023	Manawatu Cricket Association Incorporated	To gain funding for our Use Ground Fees we pay to the council each year for the lease of grounds	\$25,000.00
22/02/2023	Te Ha Ora the Asthma and Respiratory Foundation Charitable Trust	Health Education	\$10,000.00
21/03/2023	Carncot Private School Trust	Swimming lessons, swimming carnival, transportation to and from activities	\$7,813.00

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21/03/2023	Palmerston North Cat Club Incorporated	We applying for a grant for our venue hire costs for our 2023 annual championship show.	\$1,805.77
21/03/2023	Youthline Central North Island Incorporated	Salary for CEO, Administrator, Business Development Manager, Lead Youthworker and Lead Counsellor	\$20,000.00
22/03/2023	Manawatu Overtones (Sweet Adelines Chorus)	perform at National sweet adelines convention in auckland	\$5,000.00
23/03/2023	Basketball Manawatu Incorporated	Facility Hire & Rent for Community Programs and Events	\$50,000.00
23/03/2023	High School Hockey Club Pn Incorporated	Community participation in hockey supporting 160 members. Development and progression of hockey	\$2,077.72
23/03/2023	Legacy Centre	Contribution towards Senior Administrator wages.	\$5,000.00
23/03/2023	Manawatu Badminton Association Incorporated	Rangatahi and Tamariki Development Programmes	\$20,000.00
23/03/2023	Manawatu Striders Incorporated	Costs of official timing for marathon/half marathon	\$5,219.40
23/03/2023	Parentline Manawatu Incorporated	Wages, SSPA conference costs & 2 laptops for staff	\$10,000.00
23/03/2023	Red Sox Sports Club Incorporated	Netball equipment required for the 2023 season	\$11,400.76
23/03/2023	Special Olympics Manawatu	Venue hire for swimming and bocce competition events & bocce weekly training & van hire	\$2,585.66
23/03/2023	The Rugby Museum Society of New Zealand Incorporated	Updating historical rugby displays, improving storage of old rugby caps, and new rugby memorabilia.	\$10,000.00
15/04/2023	Manawatu Jazz Club Incorporated	56th Annual Manawatu International Jazz and Blues Festival Promotion Festival Promotion	\$5,648.00
19/04/2023	Aotearoa Jazz Education and Performance Charitable Trading Trust	Delivery of a national competition for high school and intermediate school jazz bands.	\$20,093.48
19/04/2023	Central Districts Indian Sports Club Incorporated	Accommodation and Travel to play in the National Indian Hockey Tournament	\$5,306.00
19/04/2023	Dannevirke Amateur Swimming Club Incorporated	We wish to hire 2 x Mini vans to transport our team of 20 swimmers to swim camp in July 2023	\$6,173.00
19/04/2023	Legacy Housing	Contribution towards Business Manager's wage.	\$8,000.00
19/04/2023	Manawatu Concert Band Incorporated	Sheet Music	\$2,000.00
19/04/2023	Manawatu Multicultural Council Incorporated	World on Stage - MMC's flagship performance showcasing cultural diversity of songs, dance and music.	\$5,000.00
19/04/2023	Manawatunes Barbershop Chorus Incorporated	Contribute to costs of attending National Barbershop Convention	\$2,200.00
19/04/2023	Massey University Football Club Incorporated	League entry and ground fees	\$17,000.00
19/04/2023	Netball Manawatu Centre Incorporated	Representative Netball Tournament costs for U14, U16, U18 and Open Teams.	\$30,000.00
19/04/2023	Palmerston North College Hockey Club Incorporated	Hockey, Safety and Protection Equipment for all teams	\$5,000.00
19/04/2023	Palmerston North Operatic Society Incorporated	This grant is to help support us with a year's worth of administration costs.	\$3,138.01
19/04/2023	Palmerston North Parents Centre Incorporated	Costs associated with running our Baby and You courses	\$3,900.00
19/04/2023	PISA INCORPORATED	Agreed to apply for funding to cover cricket ball costs for the Men's Premier Indoor Cricket Team.	\$786.60

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19/04/2023	PN Marist Football Club Incorporated	Grounds Fees for Winter season - senior teams	\$17,050.00
24/04/2023	Diabetes New Zealand	Public education campaign, strengthening and supporting our awareness, and information delivery	\$20,000.00
22/05/2023	St John Feilding Area Committee	Cover costs to support First Aid Course for Manchester House Social Services	\$1,452.00
26/05/2023	Epic Music Foundation	Music tuition costs for children to learn whist at school.	\$2,608.00
26/05/2023	Freyberg Old Boys' Rugby Football Club Incorporated	To provide our members with a shared place to connect with one another and the wider community.	\$16,596.00
26/05/2023	Hockey Manawatu Incorporated	Flights for our U18 Boys Team to attend national tournament.	\$5,000.00
26/05/2023	Manawatu Blokart Club Incorporated	To purchase 2 complete landsailing blokarts for use by our Youth academy sailors.	\$11,223.38
26/05/2023	Milson Playcentre	To replace the roof of our building	\$21,300.00
26/05/2023	New Zealand Canoe Polo Association Incorporated	NZ Canoe Polo would like to apply for 19 Personal floatation devices used when playing canoe polo	\$3,386.96
26/05/2023	Special Olympics Lower North Island Regional Council	Medals and Ribbons for place getters in sports events	\$15,000.00
26/05/2023	St John Palmerston North Area Committee	Cover costs to support school leavers attend a free St John Level 2, First Aid Courses	\$17,339.22
26/05/2023	Swamp City Roller Rats Incorporated	Venue hire for roller derby training and hosting games/competitions	\$8,270.04
26/05/2023	The Palmerston North Brass Band Incorporated	To host the Central Districts Brass Band competition.	\$4,616.40
30/05/2023	Deaf Sports New Zealand Incorporated	Uniforms to represent and unite the team at upcoming event at Australia Deaf Games.	\$10,000.00
30/05/2023	Taekwondo Union Of New Zealand Incorporated	Funding for our annual Instructors Camp and 30th Anniversary celebrations for our 25 member clubs.	\$7,520.00
21/06/2023	Hockey New Zealand Incorporated	Secondary School and National U18s Tournament's First Aid Services	\$10,000.00
21/06/2023	Manawatu Lawn Tennis Club Incorporated	To replace the court surface of 5 tennis courts	\$31,778.48
21/06/2023	Massey University Netball Club	Apply for accommodation (incl food) for NZ University games held in Wellington Sept 23-24th 2023	\$4,968.00
21/06/2023	Palmerston North Bird Club Incorporated	Grand National Bird Show which is the main show of the year,	\$7,710.00
21/06/2023	Palmerston North Fire Brigade Vintage Equipment Society Incorporated	To restore a 1950 Vintage Fire Engine this grant will be used to purchase fundraising goods to sell	\$4,035.73
21/06/2023	Palmerston North Girls' High School	NZSS Winter Tournament for badminton, netball, basketball, football and hockey.	\$29,233.04
21/06/2023	The Free Store Charitable Trust	For a defibrillator to help ensure the health and safety of people who visit Just Zilch.	\$2,850.00
21/06/2023	The St Peter's College (Palmerston North) Board of Trustees	Accommodation and entry costs linked to attending the Senior Netball Tournament in Wellington.	\$2,465.22
23/06/2023	Ashhurst School Board of Trustees	We are offering every child a chance to do EOTC and we would like a help with transport costs	\$16,500.00
23/06/2023	Badminton Central Region Incorporated	Junior and Coach Regional Badminton Development Camps	\$3,442.00

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23/06/2023	Meehan's Boxing Club	To pay for 2023 gym rent & transport & accommodation for team at National Boxing Champs in Tauranga	\$21,312.00
23/06/2023	Mentored Charitable Trust	funding to help pay our only paid staff member	\$10,000.00
23/06/2023	The Palmerston North Boys' High School Board of Trustees	Transportation costs for winter sport tournaments and school activities	\$30,168.04
23/06/2023	Whāngai Ora	Safe distribution of pasteurised human donor milk	\$2,550.00
23/06/2023	Youthline Central North Island Incorporated	Purchase of Vehicle for Youthwork teams to travel to our central regions schools,	\$33,980.00
<b>Total</b>		<b>154</b>	<b><u>\$2,275,366.27</u></b>



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## Hospitality New Zealand

TO PALMERSTON NORTH CITY COUNCIL

SUBMISSION ON THE  
'GAMBLING POLICIES REVIEW'

10<sup>TH</sup> July 2023

**CONTACT DETAILS:** Hospitality New Zealand

Contact: Adam Parker

Phone: 0800 500 503

[www.hospitality.org.nz](http://www.hospitality.org.nz)

## 52-2

**About Hospitality New Zealand:**

1. Hospitality New Zealand ("Hospitality NZ") is a member-led, not-for-profit organisation representing around 3,000 businesses, including cafés, restaurants, bars, nightclubs, commercial accommodation, country hotels and off-licences.
2. Hospitality NZ has a 121-year history of advocating on behalf of the hospitality and tourism sector. We work tirelessly on behalf of our members to promote the industry, partner with government to prevent restrictive legislation, protect commercial interests and to spearhead innovation for a sustainable future.
3. As the trusted body, we seek to unlock the industry's full potential as a significant engine for growth in the New Zealand economy and to ensure that the industry's needs are represented by engaging with the Government and wider industry.
4. Hospitality NZ has recently launched the Accommodation Association NZ. The purpose of the Accommodation Association is to ensure that the accommodation sector is well understood by central, local government and the regulators.
5. This submission relates to the Gambling Policies Review.
6. Enquiries relating to this submission should be referred to Adam Parker, Lower North Island Regional Manager at Hospitality New Zealand.

**Specific Comments:**

7. The Hospitality industry is not only a significant employer in New Zealand, but it is the cornerstone of our culture and plays a vital role in our social life.
8. Hospitality New Zealand and its members support the minimisation of harm caused by gambling however, the Number of Class 4 Gaming Machines available in New Zealand has had no discernible effect on the number of problem gamblers identified.<sup>1</sup>
9. Department of Internal Affairs (DIA) statistics show that, between 30 June 2003 and 31 March 2020: the number of gaming venues naturally reduced from 2,122 to 1,074 (a 49% reduction)<sup>1</sup>. The number of gaming machines operating reduced from 25,221 to 14,847 (a 41% reduction)<sup>1</sup>.
10. Over the past 15 years, more than 10,000 gaming machines have been removed from New Zealand communities, but the problem gambling rate has remained static at an average of around 0.5% of the adult population over this time (currently 0.1%–0.2%, according to the most recent studies). This is among the lowest problem gambling rates in the world. Canada's, for example, is 3%.
11. There appears to be no direct correlation between gaming machine numbers and problem gambling rates. Over the last ten years, the problem gambling rate has remained static, despite gaming machine numbers declining rapidly (4,472 gaming

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machines have been removed from the market)." Such limitations will simply reduce grants available to the community.

12. Statistics have shown that through natural attrition, the number of gaming machines have fallen dramatically since 2004. In fact, in the last three years from 2020 to 2023, the number of venues has declined from 22 to 21 and the number of machines has declined from 313 to 295 without any intervention.
13. Furthermore, there does not appear to be any evidence that a sinking lid policy is the best option for Palmerston North. A sinking lid simply reduces community funding by reducing the fundraising infrastructure. This does nothing to tackle the complex addiction that is problem gambling
14. If gaming venues were to be removed (*or significantly capped*) from the community, gamblers will most likely move to the online environment where gambling is unregulated and unmonitored. There are no harm minimisation measures in the online world, and returns nothing to the New Zealand community.
15. Offshore gambling entities do not:
  - Return proceeds to our communities
  - Pay GST or provisional tax to the central government
  - Pay the problem gambling levy that New Zealand operators do
  - Operate under any gambling harm minimisation programme or restrictions around vulnerable users
  - Have a closing time
  - Have any control mechanisms around trained staff physically monitoring customers
  - Provide information for problem gambling help to New Zealanders
  - Have restrictions on credit card use for gambling
16. According to new information released by DIA in June 2019, New Zealanders spent more than \$2m dollars per month or \$381m over 18 months on unmonitored offshore gaming<sup>2</sup>
17. All Class 4 venues are strictly supervised by the Department of Internal Affairs (DIA) and controlled through electronic monitoring, trust auditing and enforcement testing to rigorously minimise gambling harm. Hospitality NZ embraces these requirements by delivering quality training in Harm Minimisation, Host Responsibility, and supporting our members to operate at Best Practice level.
18. Problem gambling, like any addiction, requires focused treatment and attention. Information on responsible gambling at venues, the use of personal exclusions and player information displays (PID's or 'pop ups') and displaying personal statistics to machine users, are all current measures to inform people around the topic of problem gambling. On-site venue training through the Gaming Trusts and HNZ (in collaboration with DIA) ensures that venues are actively managing their legislative responsibilities towards their guests to ensure a safe community environment.
19. The objective of the Palmerston North City Class 4 Gambling Venue Policy is 'to ensure Palmerston North City Council and the community have influence over the location of new Class 4 gambling venues in the city. The word "Influence" has a very different

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meaning to “complete control”. Hospitality New Zealand a sinking lid policy goes further than just having an “influence” and instead, allows Palmerston North City Council complete control with an irreversible nature on the Class 4 Gaming landscape in Palmerston North City.

20. Palmerston North City Council appear to be suggesting that the number of problem gamblers in Class 4 Gaming venues across the city is increasing, but the number of gaming machines is naturally decreasing. Considering that 10 years ago there was significantly more gaming machines available in venues across Palmerston North, yet rates of problem gamblers was arguably the same as it is today in 2023 or less. Based on this information, Hospitality NZ believe that Palmerston North City Council will not achieve the desired outcome by implementing a sinking lid policy the Palmerston North City.
21. Hospitality New Zealand believe that there is no actual justification for a sinking lid policy, other than to completely restrict Class 4 Gaming in Palmerston North for the future which could be seen as an overreach of authoritarian control.

**Recommendations:**

22. Hospitality New Zealand recommends that Palmerston North City Council considers working with associations such as Hospitality New Zealand in order to increase professional training for the employees of Class 4 Gaming venues, to increase efficiency and quality of their monitoring procedures and intervene with potential problem gambling situations. This approach would take a ground up approach with a less top-down authoritarian style, in favour of a more proactive and educational approach from the ground up. The former approach will simply push people to continue their habits of gambling online, in an unregulated format.
23. Finally, Hospitality New Zealand suggests that Palmerston North City Council Palmerston North City Council cease their continued attempts to implement policy that neglects to be backed by sufficient evidence in order to produce the desired outcome.

**Conclusion:**

24. We would like to thank Palmerston North City Council for an opportunity to comment on the Gaming Policies Review consultation.
25. We would be happy to discuss any parts of this submission in more detail, and to provide any assistance that may be required, including an oral submission.

**Reference list**

1. **DIA statistics:** [https://www.dia.govt.nz/diawebsite.nsf/wpg\\_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict](https://www.dia.govt.nz/diawebsite.nsf/wpg_URL/Resource-material-Information-We-Provide-Summary-of-Venues-and-Numbers-by-Territorial-AuthorityDistrict)
2. <https://assets.mylotto.co.nz/assets/uploads/f1ecf8c6-e22b-11e8-8852-eeb1d7d3b241.pdf>

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## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Lukas
Last name	Dreyer
Organisation you represent	ExMed for Cancer charity
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	Yes
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	These gambling machine supported charities provide essential funding for the work we do with Cancer patients that are otherwise not available. There is no official funding for exercise treatment of Cancer patients and without these gambling machine generated charities no support will be available for patients. The same applies to Parkinson's and Alzheimer's patients.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	I support more clarity with the wording of the proposed changes. It is very vague as it stands at the moment.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Big daddy legislation which essentially want to enforce limitations on people is based on a foundation that people are to 'stupid' to look after themselves. These sort of legislation does not cure a problem it suppress human rights. Problem gamblers will find other ways to gamble. Stop looking for easy and cheap solutions that will most likely make no impact on

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	the part of the population who really have a gambling problem.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Peter
Last name	Russell
Organisation you represent	Palmerston North Bird Club Inc
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	The money that we get from Pub Charity has made the difference in running a successful National bird show.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Rachel
Last name	Findon
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	<p>Pub funding provides our Sports Club and the community with grants/funding that allows us to subsidise player registration fees, pay for equipment, coaching and ground hire (amongst many other things) Simply put, less machines = less profits to be shared in our community.</p> <p>Without funding to assist with community events/sports individuals will need to pay full costs which would hugely reduce player numbers.</p>
Supporting information	



## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Loren
Last name	Goss
Organisation you represent	Te Pae Poitarawhiti o Ikaroa ki te Raki
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I don't know/no opinion
Comments:	Alot of fundung required for groups is grateful to Pub Charity enabling grants that are available
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	If moving to a new premises, current machines should go with them
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Heather
Last name	Verry
Organisation you represent	Diabetes New Zealand
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	The grant funding provided by these machines is significant for the not for profit sector. Reducing this funding will mean a reduction in services provided. Our organisation receives little government funding, but is expected to support over 300,000 people with diabetes to prevent the costly complications such as stroke, renal failure, blindness and lower limb amputations.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Donna
Last name	Cardno
Organisation you represent	Legacy Centre, Legacy Housing, Legacy Property Group
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I don't know/no opinion
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Christine
Last name	Quinn
Organisation you represent	Northern Club (Manawatu) Inc.
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	There is no clear evidence presented by Council staff for proposing a change of policy to a sinking lid policy, as such Northern Club (Manawatu) Inc. opposes the proposed Policy. Recipients of these grants rely heavily on these funds and any cap would result in less funds being available to the community, putting more pressure on already strained budgets.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

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## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Pam
Last name	Francombe
Organisation you represent	Te Ha Ora The Asthma and Respiratory Foundation
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	<p>Asthma and Respiratory Foundation NZ receives no government funding. Annually we apply for around 30 grants to raise about \$534,000. If gaming organisations, like Pub Charity Ltd, were to be removed our income would greatly reduce, which would have a significant impact on our ability to provide vital services to the Palmerston North community.</p> <p>A reduction in grants would affect several areas of their work:</p> <ol style="list-style-type: none"> <li>1. Advocacy: The Foundation engages in advocacy to raise awareness about respiratory conditions and advocate for policies and initiatives that support the well-being of affected individuals. With reduced funding, our ability to advocate effectively may be compromised. We would have limited resources to dedicate to advocacy campaigns, resulting in less attention on respiratory health issues in the Palmerston North community.</li> <li>2. Education and Training: The Foundation conducts educational programmes to empower individuals with respiratory conditions to manage their health effectively. These programmes provide valuable information and resources that help improve the lives of those affected. A reduction in funding would likely force the foundation to scale back or even stop these initiatives, limiting access to essential education and training opportunities for the Palmerston North community.</li> <li>3. Resources: Pub Charity's grants contribute to the development and distribution of resources such as brochures, pamphlets, and online materials that provide important information about respiratory conditions. A reduction in funding would limit the availability of these resources, making it more difficult for individuals to access relevant and up-to-date information about their condition, treatment options, and self-care practices.</li> <li>4. Awareness: The foundation relies on funding to raise</li> </ol>

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	<p>awareness about respiratory conditions within the community. This includes organising events, campaigns, and initiatives to increase public knowledge and understanding of respiratory health. A decrease in funding would decrease the capacity to run awareness programmes, reducing the visibility of respiratory health issues and potentially leading to decreased public awareness and support for affected individuals.</p> <p>In summary, a reduction in community grants from Pub Charity would significantly impact the Asthma and Respiratory Foundation's ability to provide crucial services to the Palmerston North community. The Foundation's work in advocacy, education and training, health literacy, resources, raising awareness, and research would all be compromised, potentially leading to decreased support, knowledge, and overall well-being for individuals with respiratory conditions in the community.</p>
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	The reality is that people will gamble - at least a percentage of on-site gambling proceeds do go back into the community and can assist charities to do some amazing mahi, unlike online gambling where all the money goes immediately overseas.
Supporting information	

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## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Alex
Last name	Sinclair
Organisation you represent	Vision Community Trust
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	As a community organisation who is reliant on funding from organisations such as Pub Charity, Mainland Foundation, NZCT, Lion Foundation, we are concerned about the prospect of having access to some of this much needed funded cut due to the proposed sinking lid policy.  We like many organisations in our city would like to see a reduction in gambling amongst at-risk communities, however we have also seen through families that we engage with that they use online gambling platforms, rather than gambling machines in these local venues. Unlike gambling machines where money is going back into the community via organisations like our, online gambling goes overseas for profit.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	

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Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	



## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Lucy
Last name	Terry
Organisation you represent	Snapback Gym
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	We receive funding support from Pub Charity - this allows us to continue to provide support to our local community, particularly youth who are at risk. Without such funding it may limit our ability to provide services to young people which are much needed in Palmerston North
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Pub Charity has supported the work we do with young people at Snapback - we value their continued support and would have concerns if we are unable to continue to receive funding.
Supporting information	

### Submission on Draft Gambling Policies 2023

Your contact details	
First name	Sarika
Last name	Rona
Organisation you represent	Massey Netball Club
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Deb
Last name	Burgess
Organisation you represent	Palmerston North Boys' High School
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	I can advise that as an Educational facility the funding that we receive is put to great use within the school and also helps students and families attend sporting and cultural fixtures that would otherwise be impossible for them. The funding the whole community receives through these grants is fantastic and always goes to great projects. Without the funding many community groups and facilities would not exist. With the cost of living being at an all time high, this is the time that we need venues operating to give grants back to worthwhile community groups and schools.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Simon
Last name	Peterson
Organisation you represent	Cycling NZ
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	The community value provided through the current distribution model is a wonderful way to support community activities. Our activities will reduce (at best) and likely not continue in the region should the proposed policy proceed.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	1. The 'actual' evidenced research into Class 4 does not support the proposed policy change. 2. The negative impact on community activities would be very real and would require council to provide new funding to hold status quo on activities.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Nikki
Last name	Cunningham
Organisation you represent	PACANZ
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	As long as the Gaming Organisations continue to maintain a large % of profits to Community Organisations AND continue to ensure that problem gambling is monitored and supported, then this funding stream to the Community, should not be curtailed
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Until the value and productivity of the Community sector is recognised and supported fully by Central and/or Local government, then Gaming funding needs to be maintained as a vital funding opportunity for Community Organisations. These Organisations can generate amazing triple bottom line returns for every dollar invested and their contribution should not be underestimated or jeopardised.
Supporting information	

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## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Jeanette
Last name	Franklyn
Organisation you represent	Motor Neurone Disease New Zealand Charitable Trust
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	There is no evidence that 'limiting the availability of class 4 gambling opportunities', by imposing a sinking lid policy is an effective way for the Council to minimise harm from problem gambling, and Council staff offer no empirical evidence to support of the claim.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	As a small national charity, we rely heavily on funding from Class 4 Gambling venues to enable us to be able to provide the high level of support for people living with MND in the community. There is increasing evidence of a rise in online gambling across the country, a lot of which is off-shore, and we imagine that this is the same in the Palmerston North region. There is no community benefit from this type of gambling, either for organisations such as ours, or in providing local employment opportunities, and we do not support the council

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	implementing a sinking-lid policy on gambling machine venues in the Palmerston North City Council region.
Supporting information	

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Bruce
Last name	Marchant
Organisation you represent	Manawatu Smallbore Rifle Association
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	As one of the many Associations that benefit from Grants received by Pub Charity we would support their submission on the Policy. As a minority sport with only 90 Members in the Manawatu we would be unable to provide benefits to our Members and would struggle to host National events without this funding. Although we do not receive major amounts of money from our Grants it means that we can continue to function as a viable Association.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I oppose this
Comments:	See Pub Charity submission
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	As I have said in my opening statement our Association would be disadvantaged by a reduction in the availability to access Grants to support the many Members and general public that benefit by our continuing operation in our chosen sport. Because we are a shooting sport many of the funding options that used to be available are now restricted, Pub Charity is one of the few remaining we can count on.
Supporting information	



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## Submission on Draft Gambling Policies 2023

Your contact details	
First name	David
Last name	Cooper
Organisation you represent	NNZ
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	<p>A "sinking lid" policy creates a problem for local organisations who support good outcomes in the community by potentially diminishing their access to funds.</p> <p>While we support measures to decrease problem gambling, is this a proven way of succeeding with this, especially while online gambling remains easily accessed with no local controls in place.</p> <p>Effectively a sinking lid policy has the potential to lower participation rates, particularly in sport, due to larger entry fees, leading to other societal problems.</p> <p>Before enacting a sinking lid policy, has council considered how the lowering of funding will be offset? Or is that just seen as an issue for those organisations who provide significant good from the proceeds.</p>
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I don't know/no opinion
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	

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## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Andrea
Last name	Jackson
Organisation you represent	Manawatū Rugby Union
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I oppose this
Comments:	While we believe reducing the harm of problem gambling is important to our community, we do not believe the best solution is to use a sinking lid policy. Our concern is with fewer gambling machines available in venues, it would continue to push gamblers online. While gambling can be an issue, there are a large number of community organisations who rely heavily on Class 4 gaming grants to offer their services.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I support this
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	Overall, we would like to endorse the feedback provided to PNCC by Sport Manawatū. While gambling is an issue, there are a large number of community organisations who rely heavily on Class 4 gaming grants to offer their services. If Council reduces the number of gaming machines, what work would council do to cover the short-fall? We agree that problem gambling is a significant issue in the community and would support increased programs to help problem gamblers and the negative social impacts caused by gambling.

## Submission on Draft Gambling Policies 2023

Your contact details	
First name	Kathy
Last name	Gibson
Organisation you represent	Manfeild Park Trust
Hearing	
Would you like to make a personal presentation in support of your submission at one of our hearings to the Mayor and Councillors?	No
Class 4 Gambling Venues Policy: "Sinking lid"	
We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.	I don't know/no opinion
Comments:	It is noted that a Social Impact Assessment has been prepared internally by Council staff to support this policy change. Did PNCC consider commissioning an independent Social Impact research study that included discussion with users of these machines so that their views could be considered as part of this policy change process? There are numerous examples where proceeds do provide significant community good to the communities where these funds are raised.
Class 4 Gambling Venues Policy: Relocating existing venues	
We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.	I support this
Comments:	There is benefit in progressive Councils allowing a licensed venue to be relocated to a more commercially suitable location within that TA.
TAB Venue Policy: Minor naming changes	
We're not proposing to make any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.	I don't know/no opinion
Comments:	
General comments	
Please note here any general comments you may have about the draft gambling policies 2023.	
Supporting information	



## Procedure Sheet Hearing of Submissions

### Presenting your submission

You have indicated a wish to present your submission before a Committee of Councillors, you can do this either in-person or online. You may speak to your submission yourself or, if you wish, arrange for some other person or persons to speak on your behalf.

We recommend that you speak to the main points of your submission and then answer any questions. It is not necessary to read your submission as Committee members have a copy and will have already read it.

Questions are for clarifying matters raised in submissions. Questions may only be asked by Committee members, unless the Chairperson gives permission.

### Time Allocation

10 minutes (including question time) will be allocated for the hearing of each submission. If more than one person speaks to a submission, the time that is allocated to that submission will be shared between the speakers.

### Who will be there?

The Community Committee will hear the submissions. The Committee comprises of elected members as identified on the frontispiece of the Agenda.

There will also be other people there who are presenting their submission. The Hearing is open to the media and the public.

### Agenda

An Agenda for the meeting at which you will be speaking will be publicly available at least two working days prior to the meeting. It will be published on the Palmerston North City Council website ([Agendas and minutes](#)) and available to view at the Customer Service Centre. The Agenda lists the submissions in the order they will be considered by the Committee, although there may be some variation to this.

### Venue

The meeting will be held in the Council Chamber, First Floor, Civic Administration Building, Te Marae o Hine, 32 The Square, Palmerston North.

The Council Chamber will be set out with tables arranged appropriately. You will be invited to sit at the table with the Councillors when called.

<b>Tikanga Maori</b>	You may speak to your submission in Maori if you wish. If you intend to do so, please contact us no later than four days before the date of the meeting (refer to the "Further Information" section below). This is to enable arrangements to be made for a certified interpreter to attend the meeting. You may bring your own interpreter if you wish.
<b>Visual Aids</b>	A whiteboard, and computer with PowerPoint will be available for your use. We prefer you notify us before the day if you will require these.
<b>Final Consideration of Submissions</b>	Final consideration of submissions will be at the ordinary meeting of the Community Committee on 27 September 2023. The media and public can attend these meetings, but it will not be possible for you to speak further to your submission or participate in the Committee deliberations.
<b>Changes to this Procedure</b>	The Committee may, in its sole discretion, vary the procedure set out above if circumstances indicate that some other procedure would be more appropriate.
<b>Further Information</b>	If you have any questions about the procedure outlined above please contact Sina Lome, Democracy & Governance Administrator, phone 06 356-8199 extension 7152 or email <a href="mailto:sina.lome@pncc.govt.nz">sina.lome@pncc.govt.nz</a> .

## MEMORANDUM

**TO:** Community Committee

**MEETING DATE:** 9 August 2023

**TITLE:** Draft Gambling Venue Policies - Summary of Submissions

**PRESENTED BY:** Stacey Solomon, Policy Analyst

**APPROVED BY:** David Murphy, Chief Planning Officer

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### RECOMMENDATION TO COMMUNITY COMMITTEE

1. That the Committee receive the memorandum titled “Draft Gambling Venues Policies – Summary of Submissions”.
- 

#### 1. ISSUE

In May 2023 Palmerston North City Council (the Council) resolved to consult with the public on its Draft Gambling Venues Policies.

Public consultation has now been completed. This memorandum provides a brief summary of the consultation process and issues which have been raised by submitters (attachment 1).

A detailed summary and advice on the issues raised as well as recommendations for further changes to the draft policies are not provided in this memorandum. Any additional advice will be provided to the September 2023 Community Committee in a subsequent memorandum, as part of the deliberations process.

#### 2. BACKGROUND

Through the Gambling Act 2003 and the Racing Industry Act 2020, the Council is required to have policies for whether and how we issue venue consents for class 4 gambling venues and TAB venues. These policies are required to be reviewed every three years. This is the fifth review of the gambling policies for Palmerston North.

The Council has two gambling policies:

1. The Class 4 Gambling Venue Policy, which relates to pokies (gaming machines) in pubs and clubs. It is used to decide whether the Council will consent to any new venue, and how many gaming machines the venue can operate.

2. The Racing Board Venue Policy, which is used to decide whether the Council will give consent to any new TAB venues in the city. It relates to stand-alone TAB venues, not TAB terminals or kiosks inside pubs.

The policies try to balance the social costs of gambling with the benefits the community receive from the community grants made by gambling trusts.

A social impact assessment was completed as part of this review and is available as part of [the May 2023 Community Committee agenda](#).

### **3. PROPOSED CHANGES TO THE POLICY**

The Council proposed and consulted on the following changes.

#### Draft Class 4 Gambling Venue Policy 2023

The principle change proposed is the introduction of a 'sinking lid' for venues and pokies in clauses 4.1 and 4.2 of the policy. The sinking lid effectively prohibits the granting of new consents for class 4 gambling venues or for any new machines. Existing venues may continue to operate, and in specific circumstances they may be permitted to relocate, but no new venues or machines would be added to the city.

The previous approach of the Council has been to set a cap on the total number of machines in Palmerston North, lowering the cap at each review. Of the two approaches, the sinking lid is the simplest and most effective approach to limiting the growth of class 4 gambling.

The Council also proposed to amend clause 4.3, related to the relocations of venues to new premises. The clause now specifies the occasions where the Council, at its sole discretion, will grant consent for the relocation of a venue. Such occasions would be:

- Due to circumstances beyond the control of the operator or the lessee of the premises, the premises are unable to continue operating at the existing location.
- The Authorised Council Officer deems that the circumstances are exceptional.

Other minor wording changes have also been made.

#### Draft TAB Venue Policy

The draft TAB Venue Policy 2023 changes are minor and include things like the name change of an entity (for example the New Zealand Racing Board is now called TAB NZ).

### **4. SUMMARY OF SUBMISSION PROCESS**

Consultation on the draft policies started on 7 June 2023, and submissions were accepted through to 10 July 2023. The Council consulted with the community using the special consultative procedure ([Local Government Act 2002, s.83](#)), as required by both the [Gambling Act 2003 \(s. 102\(1\)\)](#) and the [Racing Industry Act 2020 \(s.97 \(2\)\)](#).



Notification of the consultation was made via public notice in the Manawatu Standard, supported by posters put up around the city, social media campaign, media release, and direct notification. Consultation material was posted on the [Council's website](#), and printed copies were available at the Customer Service Centre, Central Library, and all other community libraries.

Any community member, business or organisation, other stakeholders or partners identified as being impacted by the proposed amendment were directly contacted with details of the proposal. Any other interested party or person was also able to submit feedback.

The Council received 71 submissions on the draft policies. Attachment 1 to this memorandum identifies the broad themes raised by submitters. The summary should be read in conjunction with the full text of each submission that was made to this consultation (item 6 of the August 2023 Community Committee Agenda).

### Submissions received

Of the submissions received, a narrow majority were in support of the proposed changes to the policies.

Table 1 provides an overview of the total support for proposal to replace the current cap on gaming machines with a sinking lid.

Number of submissions that <b>support the proposal</b>	36
Number of submissions that <b>oppose the proposal</b>	31
Number of submissions that <b>don't know / have no opinion</b>	4
Number of submissions that <b>did not state their support</b> (or it is not clear for staff to accurately determine support)	-
<b>Total number of submissions received on the proposal</b>	<b>71</b>

Table 1: Total support for replacing the cap on gaming machines with a sinking lid.

Table 2 provides an overview of the total support for proposal to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.

Number of submissions that <b>support the proposal</b>	35
Number of submissions that <b>oppose the proposal</b>	21
Number of submissions that <b>don't know / have no opinion</b>	12
Number of submissions that <b>did not state their support</b> (or it is not clear for staff to accurately determine support)	3
<b>Total number of submissions received on the proposal</b>	<b>71</b>

Table 2: Total support for clarifying the wording of clause 4.3.

Table 3 provides an overview of the total support for proposal to clarify the wording of the TAB Venue Policy. The proposed changes are minor, reflecting changes to names.

Number of submissions that <b>support the proposal</b>	36
Number of submissions that <b>oppose the proposal</b>	3
Number of submissions that <b>don't know / have no opinion</b>	26
Number of submissions that <b>did not state their support</b> (or it is not clear for staff to accurately determine support)	6
<b>Total number of submissions received on the proposal</b>	<b>71</b>

Table 3: Total support for clarifying the wording of the TAB venue.

## 5. NEXT STEPS

Staff will prepare advice on the issues raised by submitters in a subsequent memorandum for the Community Committee. Following the consideration of any recommendations made by the Committee to the Council, Council will be able to adopt the reviewed policies.

The reviewed policies will come into effect shortly thereafter.

## 6. COMPLIANCE AND ADMINISTRATION

Does the Committee have delegated authority to decide? Delegations Manual – Part 2, Community Committee pp. 47 - 48	<b>Yes</b>
Are the decisions significant?	<b>No</b>
If they are significant do they affect land or a body of water?	<b>No</b>
Can this decision only be made through a 10 Year Plan?	<b>No</b>
Does this decision require consultation through the Special Consultative procedure?	<b>Yes</b>
Is there funding in the current Annual Plan for these actions?	<b>Yes</b>
Are the recommendations inconsistent with any of Council's policies or plans?	<b>No</b>
The recommendations contribute to Goal 3: A Connected and Safe Community	
The recommendations contribute to the achievement of action/actions in Safe Communities	
The action is: No specific action is given. However, the implementation of the Class 4 Gambling Venues Policy and the Racing Board Policy includes a statutory review of the policies which is required by legislation.	
Contribution to strategic direction and to social, economic, environmental and cultural well-	<p>A regular review of policies ensures that they are up-to-date and are contributing to the outcomes that the Council is working towards. Addressing the availability of gambling opportunities contributes towards the reduction of problem gambling.</p> <p>This supports the Council's strategic priorities for:</p>

being	<ul style="list-style-type: none"> <li>• a healthy community where everyone has access to healthy, safe and affordable housing and neighbourhoods; and</li> <li>• to be a city where people feel safe and are safe.</li> </ul>
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## ATTACHMENTS

1. Summary analysis of submissions - gambling policies [↓](#) 



## Summary Analysis of Submissions

### Draft Gambling Venue Policies' Review 2023

#### Purpose of this document

This document summarises the submissions made to the Palmerston North City Council (the Council) on the proposed changes to the Class 4 Gambling Venue Policy and the TAB Venue Policy.

Information provided in this document is summarised from the feedback of submitters. This document should be read in conjunction with the full text of each submission.

### Overview of the proposal made by Council

The Council is required to have policies to determine whether and how it will give consent for class 4 gambling venues and gaming machines, and TAB venues. The Council is also required to review its policies under the Gambling Act 2003 and the Racing Industry Act 2020 every three years.

Class 4 gambling is any activity that involves the use of an electronic gambling machine (also known as a pokie) outside of a casino. A class 4 gambling venue is a place where gambling machines are located or proposed to be located.

The objectives of the Class 4 Gambling Venue Policy are:

- To ensure the Palmerston North City Council and the community have influence over the location of new Class 4 gambling venues in the city.
- To allow existing class 4 gambling venues to continue operating at their current premises.
- To have regard to the social impact of gambling within Palmerston North, and to minimise the harm to our communities caused by problem gambling.
- To prevent the growth of class 4 venues or the number of gaming machines in existing venues.

The objectives of the TAB Venue Policy are:

- To ensure Palmerston North City Council and the community has influence of the location of new TAB venues.
- To have regard to the social impact of gambling within Palmerston North, and to minimize harm to our communities caused by problem gambling.

### Class 4 Gambling Venue Policy

Council proposed a significant change to the Class 4 Gambling Venues Policy, removing the fixed cap it had on class 4 machines, and introducing a sinking lid to the city.

Where the previous cap meant that the total number of pokie machines in the city could not exceed the specified amount, the sinking lid means that no new venues or machines will be able to be added to Palmerston North.

Further, the Council proposed to amend the Policy, to clarify and specify the occasions where a class 4 venue would be able to relocate to new premises.

### TAB Venue Policy

Council did not propose to make any significant changes to the TAB Venue Policy. Changes that were proposed were minor, and reflected that the Racing Act had been replaced by the Racing Industry Act 2020, and that the NZ Racing Board is now known as the TAB NZ.

The full proposal is available on the [Council's website](#).

### Prior resolutions of Council

Information already provided to the Council as part of this process can be accessed in previous committee reports.

- 24 May 2023 Community Committee report titled [Draft Gambling Venue Policies – Approval to Consult](#).

The May Community Committee report (linked above) also includes the [social impact assessment](#) that has been completed for this review.

#### Summary of submissions

The Council received 71 submissions to its proposal, with 33 submissions made by individuals, and 38 made by or on behalf of groups or organisations. The majority of submissions were in support of the proposed changes.

The issues raised by submitters are summarised thematically in Table 1.

The summary does not replace the detailed feedback provided by individual submitters in their original submissions, which the Committee should refer to in the first instance.

The questions asked of submitters as part of the consultation were:

1. We propose to replace the current cap on gaming machine numbers with a "sinking lid". This means that the Council would not grant consent for any new venues or any additional gaming machines in existing venues.
2. We propose to clarify the wording of clause 4.3 to make clearer when we will grant consent for an existing venue to move to a new location.
3. We're not proposing to many any significant changes to the TAB Venue Policy. All the changes are minor, reflecting changes to names.
4. Please note here any general comments you may have about the draft gambling policies 2023.

For questions one, two, and three, respondents using the online form were given the options:

- I support this;
- I oppose this; or
- I don't know / no opinion.

Question four was an opportunity for respondents to share any other thoughts they had on the proposals made.

#### Summary of submissions by theme

Submissions received commonly included comments or sentiment according to the following themes.

NOTE: the following themes wholly relate to the Class 4 Gambling Venue Policy. Few comments were made on the TAB Venue Policy, other than to signal support, opposition, or no opinion on the changes.

<b>Table 1: Summary of Submissions by Theme</b>		
<b>General Theme</b>	<b>Submission</b>	<b>Total</b>
<b>Theme 1: Relocating Venues</b> Relocating venues should not be able to keep their machines. This goes against the purpose of a sinking lid. <ul style="list-style-type: none"> <li>A true sinking lid would not allow relocating venues to keep any machines.</li> <li>Suggest further strengthening the sinking lid to include no mergers when a venue proposes to relocate.</li> </ul>	1, 9, 18, 29, 36, 42, 45, 46, 51	9
<b>Theme 2: Problem gambling will not be resolved with the proposed policy</b> Removing pokie machines does not mean problem gambling will be solved, it will only move locations. <ul style="list-style-type: none"> <li>Online Gambling is particularly pervasive and harmful – problem gamblers are not easily identified and interventions made to prevent excessive gambling if they are gambling online or in private.</li> </ul>	2, 4, 35, 40, 44, 46, 51, 52, 66, 70	10
<b>Theme 3: Economic benefits for local businesses from pokies</b> Restricting class 4 gambling can be harmful to local business or trade. <ul style="list-style-type: none"> <li>Class 4 gambling is a legal form of recreation and entertainment.</li> </ul> This theme occurred in conjunction with theme 10 related to venues being relocated and improving hospitality and local business areas.	2, 17, 35, 40, 44, 52	6
<b>Theme 4: Gambling can lead to other negative social impacts:</b> In particular family violence, increased health issues (such as drug use) or other illegal activity. Themes 4 and 5 were often linked.	12, 36	2
<b>Theme 5: Gambling causes financial harm</b> Low income, high deprivation, marginalised, more vulnerable communities are particularly affected by pokies and problem gambling.	12, 16, 24, 33, 36, 42, 45	7



<b>Theme 6: Gambling has a significant negative impact on the wider community</b>  Pokie machines are detrimental to individuals and therefore community. Reducing the negative impact of pokie machines for problem gamblers and the community is important for the wellbeing of the community broadly.	3, 5, 9, 10, 11, 12, 18, 32, 42, 43	10
<b>Theme 7: Support should be available for problem gamblers</b>  General agreement that supporting problem gamblers to manage their gambling issues is important. This is easier to do in a monitored or controlled environment.  Comments often occurred alongside theme 2 comments, from those who support, and those who oppose the policy.	5, 48	2
<b>Theme 8: Retain the cap on machines</b>  Gaming machine numbers are naturally reducing over time under the current policy setting. Implementing a sinking lid is therefore unnecessary.	8, 40, 44, 46, 51, 52	6
<b>Theme 9: More evidence is needed for the proposed changes to be made</b>  National figures do not support the changes proposed by the Council, particularly the proposal to introduce a sinking lid.	8, 35, 40, 44, 52, 59, 65, 67, 71	9
<b>Theme 10: Relocation provision should be expanded.</b>  The proposed relocation clauses are too restrictive and should instead enable relocation: <ul style="list-style-type: none"> <li>from areas of high deprivation to areas of low deprivation, and out of residential areas.</li> <li>when tenancy at the current venue is unreasonable.</li> <li>when the current premises are unsuitable / dangerous eg: earthquake prone.</li> </ul> Reasons given: <ul style="list-style-type: none"> <li>Venue relocation can be a harm minimisation tool.</li> <li>Venue relocation can improve business and local economy.</li> </ul>	8, 17, 40, 44, 50, 56, 71	7

<p><b>Theme 11: Funding from gaming machines is significant and important to the community</b></p> <p>Reducing the number of pokie machines means that there will be a subsequent reduction in funds available for the community to access.</p> <ul style="list-style-type: none"> <li>Is the Council prepared to meet the gap in available funding?</li> </ul> <p>Benefits from pokie machines for the broader community should be carefully balanced against the harm they cause.</p>	<p>8, 17, 28, 35, 37, 44, 46, 47, 48, 49, 51, 52, 53, 54, 55, 56, 57, 59, 60, 61, 62, 64, 65, 66, 67, 68, 69, 70, 71</p>	<p>29</p>
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#### Website

Information for the consultation was hosted on the Council website, which showed that 979 people visited the page a total of 2,747 times, and the online form had 503 views in total.

#### Social media engagement

Posts and paid advertisements were made to the Council Facebook page as part of this consultation, with the following combined total statistics:

Reach: 22,704

Impressions: 42,456

Landing page views: 748

Engagement on the post: 1305

Link clicks: 52

Comments made via social media often related to addressing the negative impacts of gambling, problematic online gambling, loss of funding from pokie proceeds, loss of recreation and entertainment opportunities, erosion of freedoms and choices, ongoing impacts on business from fewer machines,

A number of comments were also made on the Council reducing the number of vape and liquor outlets in Palmerston North. The comments made on social media suggest vape and liquor outlets are as much of an issue for the community as gambling is. However, vape and liquor outlets are beyond the scope of this consultation and these policies.

A more detailed sentiment analysis of the feedback received via Facebook will be provided as part of the advice prepared in the subsequent committee report for this process.

## MEMORANDUM

**TO:** Community Committee

**MEETING DATE:** 9 August 2023

**TITLE:** Impact of changes to SuperGold Card and Community Services Card free parking rules

**PRESENTED BY:** Hamish Featonby, Group Manager - Transport & Development and James Miguel, Senior Transport Planner

**APPROVED BY:** David Murphy, Chief Planning Officer  
Chris Dyhrberg, Chief Infrastructure Officer

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### RECOMMENDATION TO COMMUNITY COMMITTEE

1. That the Committee refer the matter of extending free parking provisions for SuperGold Card holders to be included in the development of the Parking Framework.
- 

#### 1. ISSUE

- 1.1 This report is provided in response to the Community Committee's resolution on 24 May 2023 that the Chief Executive provide a report back on the implications of extending free parking for SuperGold Card holders from 9.00am to 12.00 noon, to 9.00am to 3.00pm or 5.00pm, and to extend this to Community Services Card holders.

#### 2. BACKGROUND

- 2.1 Managing Palmerston North's transport system, including carparking, is a complicated process, with many competing demands and users to balance and cater for. Poorly managed public carparking can result in negative outcomes that will undermine the city's desired goals, limit travel choices and further exacerbate the city's car dependency. To avoid these issues parking management needs to be tailored to local conditions with an alignment to wider strategies and planning.
- 2.2 In order to provide a more integrated approach to carparking management, a parking framework is being prepared. The aim of the parking framework will be to ensure that Council decisions and the day-to-day management of carparking give effect to a set of guiding principles which support Council's broader goals and strategies. Development of the parking framework is at the early stages of the process. Initial guidance will be sought from elected members at an upcoming workshop.

2.3 Currently in Palmerston North, parking meter charges are applied from Monday to Saturday. Parking is free until 11am on Saturday, and all day on Sunday and public holidays. Meters are operational during the following hours;

- Monday to Friday: 8.30am to 5.30pm
- Saturday: 11.00am to 3.00pm

2.4 Parking fees are charged at a rate of \$1.70/hour for on-street parking and \$1/hour for off-street parking. Payments can be made at the meter or via the Frogparking mobile app, which allows customers to make payments from wherever they are in the city.

2.5 There are 1,592 sensored parking bays on and within the “ring road”.

2.6 In June 2021 PNCC proposed to increase the parking fees (to the current \$1.70/hour) and extend the operational span of metered parking. This was met with considerable community opposition, and it subsequently resulted in the operational span, outlined in paragraph 2.3, of metered parking not changing. Submissions raised during this process indicated that the community wanted a greater level of involvement in parking management. With a number of key stakeholders for the city (Palmy BID and Manawatu Chamber of Commerce) expressing a desire to be involved in the parking framework.

### **SuperGold cards**

2.7 In 2011 Council passed a resolution that residents of Palmerston North who held a current SuperGold Card would be exempt from paying for parking between the hours of 9 - 11am Monday to Friday. In 2015 this was extended to 9am – noon.

2.8 Annually, SuperGold Card holders who are residents of Palmerston North may apply to Council for SuperGold Parking Permits. The current cost of \$10.00 per permit contributes to the associated administration costs.

2.9 As indicated by the following statistics, the number of SuperGold Parking Permit holders has been reasonably steady over the last three years;

- 2021: 2292
- 2022: 2257
- 2023: 2342

2.10 Between the hours of 9am - noon, Monday to Friday, holders of the SuperGold Parking Permit may display a current Permit on their dashboard and park in any metered car park.

- 2.11 Parking sensors alert parking officers to vehicles that have “overstayed”. Officers then attend the vehicle, sight the Parking Permit ensuring that it is current, before suppressing the alert issued by the sensor to their handheld device. Officers estimate that on average this takes approximately 10 minutes of officer time per alert.
- 2.12 SuperGold parking permits under the current rules are included in the scope of the parking framework and will be reviewed alongside other permits.

### **Mobility Permits**

- 2.13 Mobility Permits are issued by CCS Disability Action.
- 2.14 There are currently 45 Mobility car parks on or inside the “ring road”. Holders of current Mobility Permits may park on any of the Mobility car parks or any metered car park free of charge for the first hour.
- 2.15 As with SuperGold Parking Permit holders, parking sensors alert Parking Officers to vehicles that have “overstayed”. Officers then attend the vehicle, sight the Mobility Permit ensuring that it is current, before suppressing the alert.
- 2.16 CCS Disability Action advise that there are currently 2358 Mobility Permit holders residing in Palmerston North.
- 2.17 Mobility Permits are currently included in the scope of the parking framework and will be reviewed alongside other permits.

### **Community Services Cards**

- 2.18 Currently there are no parking concessions in place for holders of Community Services Cards (CSC).
- 2.19 The Health Entitlement Cards Regulation 1993 govern the authorised uses of a CSC. The uses outlined under regulation 12 allow for a CSC to be produced as evidence of eligibility to access reduced costs for the pharmaceutical, medical, and public transport services. Under regulation 13(3) only an employee of the Ministry of Health and Pharmacists may demand or request to see a CSC as a form of evidence that the individual is a holder of a CSC.

Under the Health Entitlement Cards Regulation 1993, PNCC cannot use the CSC as a way of providing free parking to holders of a CSC.

### **Parking Data**

- 2.20 The following table shows the number of SuperGold Parking Permit suppressions and the assumed monetary value of the suppressions for the last three years.
- 2.21 Available data does not show how long the customer remained in the parking bay. Therefore, two assumptions are made, the first being that the

customer remained for one hour and the second that the customer remained for the full three hours.

Time period	Suppressions by volume	Dollar value (based on one hour parked)	Dollar value (based on three hours parked)
1 July 2019 – 30 June 2020	3194	\$4,791.00	\$14,373
1 July 2020 – 30 June 2021	5822	\$9,897.40	\$29,692.20
1 July 2021 – 30 June 2022	6440	\$10,948.00	\$32,844
1 July 2022 – 30 June 2023	7166	\$12,182.20	\$36,546.6

- 2.22 The following data provides the number of Mobility Parking Permit alerts that have been suppressed and the monetary value of the suppressions for the last three years. Data does not clarify how long the suppression was for and therefore the total by dollar assumes that the customer parked for the maximum free period of one hour.

Date	Suppressions by volume	Dollar value (based on one hour parked)
1 July 2019 – 30 June 2020	253	\$379.50
1 July 2020 – 30 June 2021	488	\$829.60
1 July 2021 – 30 June 2022	511	\$868.70
1 July 2022 – 30 June 2023	580	\$986.00

- 2.23 Usage statistics of Parking from Monday to Friday is shown in the table below. The data shows that the morning has fewer but longer stays compared to the afternoon which has more that stay a shorter time. Please note that this data is heavily 'averaged' in order to show a broad picture but within that usage will be times during the day where there is utilisation at either end of the spectrum from very busy to very quiet.

Period: 1/7/22 - 30/6/23	8am - 12pm	12pm - 5pm
Utilisation Average %	47%	33%
New Occupancies Average	3868	4973
Average Stay Duration (mins)	54	40

### Financial Implications

- 2.24 In total the revenue received from paid parking is circa \$3,885,221 per annum and operating costs associated with parking is circa \$2,380,381 including the enforcement and administration costs with the difference between them being utilised to maintain the parking infrastructure.
- 2.25 The increase in time allowance for any of the parking permits is likely to have only a small percentage impact on the revenue stream from Parking, however we cannot model this with the data we have available. If we presumed the worst-case scenario for SuperGold Card holders of double the number of suppressions for 22/23 financial year in section 2.18 then we would be looking at a total of \$73,093 of lost revenue which would equate to a decrease of just under 1%.
- 2.26 The figures presented do not include the economic impact of parking permits on city centre businesses. As many businesses rely on a high turnover rate of car parks, this could potentially have a negative impact due to more vehicles occupying car parks for a longer period of time. This impact cannot be easily modelled with the information that is currently available.

### Wider Implications

- 2.27 If the Council elected to extend the current SuperGold free parking hours, this decision will be made in isolation from the wider discussion and analysis that will occur as part of the development of the parking framework. This means that the Council will not be able to get the views of other key stakeholders and will be making the decision prior to confirming its objectives for carparking, which should give effect to the Council's broader goals and strategies.
- 2.28 As noted earlier in paragraph 2.6 parking management has a lot of interest for the community, with a diverse range of needs. While extending the free parking SuperGold hours will likely have benefits for those that are able to access it, there is a reputational risk to the council if it makes a decision to extend the scheme without undertaking wider community engagement or consultation. This risk can be avoided by incorporating the request to extend the SuperGold free parking hours into the development of the ongoing parking framework

## 3. NEXT STEPS

- 3.1 Officers will ensure that the scope of the parking framework includes consideration of the request to extend the SuperGold Card free parking hours. This will allow for the impacts to be considered alongside the wider parking rules for the city.
- 3.2 Officers will continue with the development of the Parking Framework, including undertaking a workshop with elected members at the end of August to discuss engagement on the framework.

#### 4. COMPLIANCE AND ADMINISTRATION

Does the Committee have delegated authority to decide? If Yes quote relevant clause(s) from Delegations Manual	<b>Yes</b>
Are the decisions significant?	<b>No</b>
If they are significant do they affect land or a body of water?	<b>No</b>
Can this decision only be made through a 10 Year Plan?	<b>No</b>
Does this decision require consultation through the Special Consultative procedure?	<b>No</b>
Is there funding in the current Annual Plan for these actions?	<b>No</b>
Are the recommendations inconsistent with any of Council's policies or plans?	<b>No</b>
The recommendations contribute to Goal 1: An Innovative and Growing City	
The recommendations contribute to the achievement of action/actions in Transport	
The action is: Develop, maintain, operate and renew the transport network to deliver on the Council goals, the purpose of this plan, and the Government Policy Statement on Transport	
Contribution to strategic direction and to social, economic, environmental and cultural well-being	Ensuring a decision on parking for the city is in line with a parking framework will help align the decision with an overall strategic purpose for the economic wellbeing of the city.

#### ATTACHMENTS

Nil



## REPORT

**TO:** Community Committee

**MEETING DATE:** 9 August 2023

**TITLE:** Review of Companion Card Scheme Trial

**PRESENTED BY:** Ahmed Obaid, Community Development Advisor and Stephanie Velvin, Community Development Manager

**APPROVED BY:** Kerry-Lee Probert, Acting Chief Customer Officer

### RECOMMENDATION TO COUNCIL

1. That Council agree to support the Companion Card scheme for the remainder of 2023/2024 financial year, and hand over delivery from 2024/2025 onwards to an appropriate arts or social sector organisation (Option 1).

### SUMMARY OF OPTIONS ANALYSIS

<b>Problem or Opportunity</b>	Companion Card scheme trial review and options for proceeding
<b>OPTION 1:</b>	<b>Continue to support the Companion Card scheme for the remainder 2023/2024 financial year, and hand over delivery from 2024/2025 onwards</b>
Community Views	<ul style="list-style-type: none"> <li>• Users, venues and Disability Reference Group support continuation of the scheme.</li> <li>• Wider community views have not been sought.</li> </ul>
Benefits	<ul style="list-style-type: none"> <li>• Scheme is maintained; people with disabilities continue to have improved accessibility to community events and activities, and venues have broader customer base</li> <li>• Less Council resource required than current model</li> <li>• Council able to move into the role of supporter, funder and advocate of the scheme, and community able to take more ownership</li> <li>• Maintenance of Council's positive reputation</li> </ul>
Risks	<ul style="list-style-type: none"> <li>• Less direct control of the scheme administration when handed over. Officers would mitigate this risk with a clear contract for services and ongoing contract monitoring.</li> </ul>
Financial	\$15,000 p/a required

<b>OPTION 2:</b>	<b>Continue to deliver the Companion Card with the existing model</b>
Community Views	<ul style="list-style-type: none"> <li>• Users, venues and Disability Reference Group support continuation of the scheme.</li> <li>• Wider community views have not been sought</li> </ul>
Benefits	<ul style="list-style-type: none"> <li>• Scheme is maintained; people with disabilities continue to have improved accessibility to community events and activities, and venues have broader customer base</li> <li>• Direct control and leadership of the scheme would continue to sit with Council and Mana Whaikaha</li> <li>• Maintenance of Council's positive reputation</li> </ul>
Risks	<ul style="list-style-type: none"> <li>• Reduced opportunity for community ownership and leadership of the scheme</li> </ul>
Financial	\$20,000 p/a required
<b>OPTION 3:</b>	<b>Cease the scheme and advocate to central government to adopt a national Companion Card scheme</b>
Community Views	<ul style="list-style-type: none"> <li>• Users, venues and Disability Reference Group do not support discontinuation of the scheme.</li> <li>• Wider community views have not been sought</li> </ul>
Benefits	<ul style="list-style-type: none"> <li>• No further operational costs involved (after 2023/2024), beyond a small amount of staff time to coordinate the correspondence</li> </ul>
Risks	<ul style="list-style-type: none"> <li>• People with disabilities have reduced accessibility to community events and activities</li> <li>• Loss of customer base for city venues</li> <li>• Reputational risk for Council</li> </ul>
Financial	<ul style="list-style-type: none"> <li>• Nil</li> </ul>

## RATIONALE FOR THE RECOMMENDATIONS

### 1. OVERVIEW OF THE PROBLEM OR OPPORTUNITY

- 1.1 Council requested a trial of a Companion Card scheme to reduce barriers for people with disabilities accessing activities and events. The trial has been conducted, and officers have completed an evaluation of the scheme.
- 1.2 The results of the evaluation are presented in this report, alongside options for next steps, for the Committee's consideration.

## 2. BACKGROUND AND PREVIOUS COUNCIL DECISIONS

- 2.1 In 2016, the Ministry of Culture and Heritage (MCH), alongside the Ministry of Social Development (MSD) undertook the initial policy development for a Companion Card scheme in New Zealand. They investigated the feasibility of introducing a Companion Card programme in New Zealand to reduce the cost barrier for disabled people who require a companion to attend paid-entry activities. They reported that while setting up a Companion Card was feasible, there was a limited evidential base at that time to understand the nature and size of the need, and there was a perceived risk of activity providers not joining the scheme. As a result, the MCH and MSD did not proceed with a national scheme.
- 2.2 On 2 September 2019, Council's Disability Reference Group presented to the Community Development Committee on their first year of activity and their aspirations looking forward. In this presentation, they requested that Council champion the concept of a Companion Card scheme to enable those with a permanent disability and a lifelong need for 'attendant care support' to participate in community activities and attend events.
- 2.3 At that meeting Council resolved:  
*"That the Chief Executive be instructed to report back on the feasibility of introducing a Companion Card for those with permanent disabilities".*
- 2.4 On the 5 of August 2020, officers presented a report to the Community Development Committee entitled "[Feasibility of introducing a companion card for those with permanent disabilities](#)".
- 2.5 At that meeting Council resolved:
  1. That Council approve undertaking a partnership with Mana Whaikaha to implement a local Companion Card Scheme (Option 1).
  2. That Council approve \$10,000 unbudgeted expense to implement such a scheme.
  3. That the scheme be reviewed after 12 months as to its effectiveness and report back to the Community Development Committee.
  4. That, at the appropriate time, the Chief Executive write to the cultural CCOs and Council funded ticketed activity providers encouraging them to support the Companion Card scheme.
  5. That the Chief Executive write to the Ministry of Culture and Heritage advocating for the introduction of a nationwide Companion Card scheme and offering the Council and Mana Whaikaha as a pilot scheme.
- 2.6 Subsequently, Programme 1952 was created in the 10 Year Plan 2021-2031, with a budget of \$10,000 in Years 1, 2, and 3.

2.7 This report presents the review of the Companion Card scheme as requested by the Committee on 5 August 2020.

2.8 As previously communicated to this Committee, delays to the start of the Companion Card scheme trial caused by Covid-19 meant the review was unable to be completed in the original timeframes. The scheme has now been in implementation for two years, and it is officers view that there has been sufficient time 'post-Covid' to assess the scheme's effectiveness.

### **3. IMPLEMENTATION SUMMARY**

3.1 Following the August 2020 resolutions, Council officers entered discussions with Mana Whaikaha to set up and administer a Companion Card scheme. A Memorandum of Understanding (MoU) was signed between Council and Mana Whaikaha on 1 April 2021.

3.2 Mana Whaikaha is a disability support service funded by Central Government to give disabled people choice and control over their supports.

3.3 Both partners developed the scheme criteria and application processes. Sporty, an online registration and membership management service provider, was identified.

3.4 Council paid for the establishment and maintenance of the online registration platform in 2021/2022 (\$3,612) and 2022/2023 (\$3,130). In alignment with the MoU agreement, Mana Whaikaha paid for 2023/2024 (\$2,208).

3.5 Mana Whaikaha set up and administered the registration process for disabled people to apply the Companion Card and kept a data base of all registered people throughout the scheme duration.

3.6 The Palmy Companion Card scheme was officially launched in August 2021.

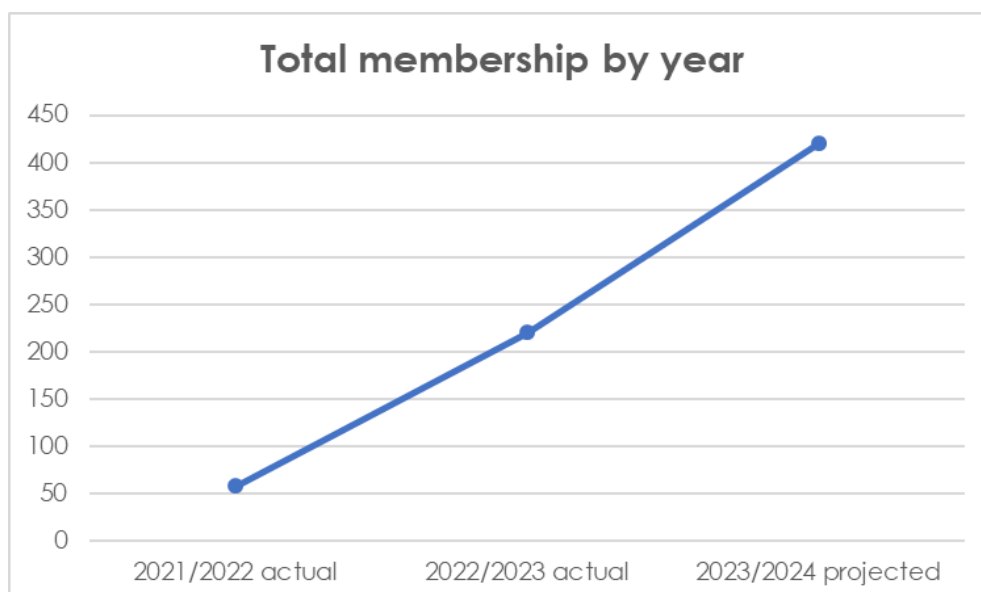
3.7 Both before and after the launch, Council approached venues to be part of the trial, including Council Controlled Organisations (CCO) and other ticketed activity providers across the city. The following venues and activity providers joined the scheme throughout the trial:

1. Regent on Broadway	13 August 2021
2. Globe Theatre	13 August 2021
3. Te Manawa	13 August 2021
4. Palmerston North Theatre Trust (Centrepont)	13 August 2021
5. Focal Point Cinema	1 May 2022
6. Creative Sounds Society Inc. (The Stomach)	30 June 2022
7. Esplanade Scenic Railway	October 2022
8. Swimming Pools (CLM)	7 October 2022
9. CET Arena	May 2023
10. Manawatū Rugby	May 2023
11. Lions Mini Golf in the Esplanade	May 2023

- 3.8 Council used the \$10,000 budgeted funds to compensate a select number of venues for the 'companion' tickets. Given that demand was unable to be anticipated and in order to reduce the administrative burden on staff and venues, officers took the approach of providing funds to some venues at the time they joined the trial. As a result, some venues still have 'credit' remaining for future 'companion' tickets. The total amount paid to the venues to date is \$6,000 (paid in 2021/2022). Officers understand the venues have used approximately half of the funds paid.
- 3.9 Council's communications and marketing division also supported the promotion of the Companion Card scheme trial. Throughout the two-year period various communications methods have been employed, including promotion on Council, Mana Whaikaha and venue social media platforms, emailing through known relevant networks, word of mouth from the Disability Reference Group, radio and newspaper promotion, and promotional posters in the venues.
- 3.10 In addition to the venue and marketing costs, which were provided for by the \$10,000 budget, the scheme has taken a reasonable amount of officer time to establish, coordinate and evaluate. It is estimated that this has taken approximately 560 officer hours across the two-year period, equivalent to around \$21,000 in salary. Note this does not account for Mana Whaikaha staff time.
- 3.11 It is also noted that officers contacted the Ministry of Culture and Heritage following the August 2020 report, and the Ministry confirmed their interest in the findings of the Palmerston North scheme.

#### **4. UPTAKE OF THE SCHEME**

- 4.1 To date, 239 people have obtained Companion Card membership. There have been a further 29 applications which were declined (12 duplications, 10 out of region, 6 not eligible and 1 other).



- 4.2 Rate of new membership over time looks to be trending upwards, with 58 new memberships in 2021/2022, 162 in 2022/2023 and 19 in July 2023.
- 4.3 Four venues have collected usage data to help assess the uptake: The Regent on Broadway have advised that 14 users have used the card 25 times; The Globe Theatre has had 6 users with 24 visits; Centrepont Theatre have recorded 5 users with 10 visits; Focal Point Cinema confirmed there have been 76 visits.
- 4.4 Due to COVID-19, the initial uptake of the Companion Card scheme in the city was slower than originally anticipated. People eligible for the Companion Card, many of whom have additional health vulnerabilities, were hesitant to go out in the community and participate in regular activities long after the formal restrictions had been removed.
- 4.5 Despite the slow start, officers are satisfied that the scheme has now gained momentum, and there are people in the community who are making good use of their membership.

## **5. FEEDBACK**

- 5.1 In order to assess the effectiveness of the scheme, in addition to reviewing membership and usage data, officers have surveyed both users and venues for their feedback and sought the views of the Disability Reference Group.
- 5.2 There is consensus across these three groups, that they see benefit in the Companion Card scheme continuing.
- 5.3 Venues are in support of the scheme continuing as they are now starting to see increased uptake from users. Venues that are hired out to third party event providers have also fed back that with continued funding for the scheme they can incentivise further event providers to accept the scheme for their events and build evidence over time of the financial benefit of this inclusivity.
- 5.4 In a survey conducted in March 2023, users were asked to rate their experience using the Companion Card. 21 users responded, and whilst the response rate was low, the findings provide an indication of the user experience so far. Findings included:
  - ☐ When asked to rate their experience of using the Companion Card, the average score was 3.7 (1 being poor, 5 being excellent).
  - ☐ When asked if they have used the card, 11 users answered 'Yes, more than once', 6 users answered 'Yes, only once' and 4 users answered 'No'.
  - ☐ Users were asked if having a Companion Card encouraged or enabled them to access more events and activities in their community. 13 answered 'Yes', 2 answered 'Same', and 5 answered 'No'.
  - ☐ Additional venues were also requested by the users, including Event Cinema, Bowlarama, Lazer Tag, Daytona Go carts and a driving range.

- 5.5 Officers spoke with the Disability Reference Group at their most recent meeting in July 2023. Members expressed the need for the scheme to continue to be supported by Council and Mana Whaikaha in order to succeed, as they felt it would take time to normalise the use of the card within the community.
- 5.6 Mana Whaikaha have confirmed their ongoing support of the scheme and are supportive of both options one and two presented below.
- 5.7 Overall, based on the information that has been gathered officers consider that the trial of the Companion Card scheme has been successful, and the scheme is proving effective in its aim of reducing cost barriers for people with disabilities to participate in community events and activities.
- 5.8 Officers are also pleased with the number of local venues who have joined the scheme, dispelling one of the perceived risks identified by the Ministry of Culture and Heritage in their 2016 feasibility assessment.
- 5.9 Officers therefore consider there are several options moving forward, as described below, and seek the Committee's direction on how to proceed.

## 6. DESCRIPTION OF OPTIONS

- 6.1 **Option 1: Continue to support the Companion Card scheme for 2023/2024, and hand over delivery from 2024/2025 onwards.**
- 6.2 As the concept has now been proven, and the processes and tools to deliver the scheme are established, following one further year of Council and Mana Whaikaha delivery in 2023/2024, the most efficient model of delivery will be to fund an organisation in the arts or social sector to undertake the administration and coordination.
- 6.3 Council and Mana Whaikaha can remain involved in the scheme in support and funding roles, providing additional promotion through organisational platforms, continuing to advocate to central government, and providing subject matter expertise where required.
- 6.4 The subscription with the Sporty application can be transferred to the contracted organisation, including the website, and there would be a full handover with the venues. General information can remain on the Council website.
- 6.5 Costs involved in this option include the funds for the contracted organisation, which officers propose to be \$15,000 per annum (allowing for an average of approx. 5 hours work per week, plus additional costs such as card printing, plus venue costs). There would be a much lower burden on officer time with this option following the handover, with only a minimal amount of resource required to monitor the contract and undertake the support as described at 6.3 above; officers are satisfied that this can be delivered within existing

resource. Note this assumes Mana Whaikaha continue to fund the subscription to the Sporty application.

- 6.6 If this option is selected, officers would also put forward a programme to the 10 Year Plan accordingly.
- 6.7 Officers would also re-establish communication with the Ministry of Culture and Heritage, providing them with information from this trial for consideration of a national scheme. Though unlikely to occur in the short term, if a national scheme were to be established over the top of the local scheme, officers will work to ensure the schemes are integrated.
- 6.8 **Option 2: Continue to deliver the Companion Card with the existing model.**
- 6.9 Rather than contracting the scheme out to another organisation, Council and Mana Whaikaha can continue to deliver the scheme as it is currently.
- 6.10 This delivery model has a higher burden on resources, equivalent to around \$10,000 per annum for staff time, as well as the \$10,000 per annum required for promotional, card printing and venue costs. Total ongoing programme cost from 2023/2024 would be \$20,000 per annum.
- 6.11 If this option is selected, officers would put forward a programme to the 10 Year Plan accordingly.
- 6.12 Officers would also re-establish communication with the Ministry of Culture and Heritage, providing them with information from this trial for consideration of a national scheme. Though unlikely to occur in the short term, if a national scheme were to be established over the top of the local scheme, officers will work to ensure the schemes are integrated.
- 6.13 **Option 3. Cease the scheme and advocate to central government to adopt a national Companion Card scheme.**
- 6.14 Council and Mana Whaikaha can wind down the programme this year, with a view to ceasing it at June 2024.
- 6.15 Officers would re-establish communication with the Ministry of Culture and Heritage, providing them with information from this trial for consideration of a national scheme.

## **7. ANALYSIS OF OPTIONS**

- 7.1 On consideration of the three options, officers view that option one will provide the greatest benefits to the community at the lowest cost.
- 7.2 The users, venues and Disability Reference Group are in support of continuing the scheme, as it is proving to reduce barriers for people with disabilities in accessing community events and activities and broadening the customer base available to venues. There is also a feeling amongst these groups that



the scheme is only just now beginning to gather momentum and has further potential to grow.

- 7.3 Given the positive feedback on the scheme, officers have considered possibilities for the most efficient model of delivery moving forward, with a view to moving into the role of supporter, funder and advocate, rather than delivery. Now the scheme is established (with one additional year already paid 'up front' with the venues and the Sporty application to embed processes further), it will be possible to hand the administration and coordination of the scheme over to another organisation from July 2024 and have the programme continue successfully.
- 7.4 In addition to reducing the resource burden on staff, this option will also ensure greater community ownership and leadership of the scheme, which more strongly aligns with Council's strategic direction for working towards community aspirations. While Council would have greater control over the day to day administration of the scheme if it was retained in the current model, this risk can be mitigated through the implementation of a clear agreement and regular contract monitoring.
- 7.5 Both option one and option two provide additional benefits in terms of maintaining the positive reputation Council has built with the disability sector as a result of their implementation of the scheme thus far; whereas option three would likely result in reputational damage.

## 8. CONCLUSION

- 8.1 This report has provided information on the implementation of the Companion Card scheme, which commenced in August 2021. Officers have reviewed feedback and data available and assessed that the scheme is providing positive benefits for the community.
- 8.2 This report has also provided options on how to proceed with the scheme, and recommends the Committee proceed with option one, as described above.

## 9. NEXT ACTIONS

- 9.1 If proceeding with the recommended option, officers will continue to work with Mana Whaikaha to deliver the scheme as it is in 2023/2024, including continued work to promote the scheme to new potential members and additional venues.
- 9.2 Officers will also work with Mana Whaikaha to investigate options for a physical card for members, as requested in the feedback from users and the Disability Reference Group.
- 9.3 Officers will also re-establish communication with the Ministry of Culture and Heritage, providing them with information from this trial for consideration of a national scheme. Though unlikely to occur in the short term, if a national

scheme were to be established over the top of the local scheme, officers will work to ensure the schemes are integrated.

9.4 Alongside this, to achieve ongoing sustainability following 2023/2024, officers and Mana Whaikaha will begin the process of identifying an organisation in the arts or social sector to take on the coordination and delivery of the scheme in future, allowing Council to move into a support and funding role.

9.5 Officers will provide an update to the Community Committee mid-2024.

## 10. COMPLIANCE AND ADMINISTRATION

Does the Committee have delegated authority to decide? If Yes quote relevant clause(s) from Delegations Manual	<b>Yes</b>
Are the decisions significant?	<b>No</b>
If they are significant do they affect land or a body of water?	<b>No</b>
Can this decision only be made through a 10 Year Plan?	<b>No</b>
Does this decision require consultation through the Special Consultative procedure?	<b>No</b>
Is there funding in the current Annual Plan for these actions?	<b>Yes</b>
Are the recommendations inconsistent with any of Council's policies or plans?	<b>No</b>
The recommendations contribute to Goal 3: A Connected and Safe Community	
The recommendations contribute to the achievement of action/actions in Connected Communities	
The action is: Goal 3 'A connected and safe community'. Priority 1: "develop, provide, and advocate for services and facilities that create a connected, welcoming, and inclusive community.	
Contribution to strategic direction and to social, economic, environmental and cultural well-being	The Companion Card scheme delivers social, economic and cultural benefits for the community of Palmerston North.

## ATTACHMENTS

Nil

## MEMORANDUM

**TO:** Community Committee

**MEETING DATE:** 9 August 2023

**TITLE:** Papaioea Place Redevelopment Six-Monthly Update

**PRESENTED BY:** Bryce Hosking, Group Manager - Property and Resource Recovery

**APPROVED BY:** Chris Dyhrberg, Chief Infrastructure Officer

### RECOMMENDATION TO COMMUNITY COMMITTEE

1. That the Community Committee receive the memorandum titled 'Papaioea Place Redevelopment Six-Monthly Update', presented on 9 August 2023.

#### 1. ISSUE

- 1.1 The Infrastructure Committee requested six-monthly updates be provided throughout the duration of the project. These updates will now be presented to the Community Committee.
- 1.2 This will be the final project update for the Papaioea Place redevelopment as the project will be completed prior to the next 6-monthly update being due.
- 1.3 A project close-out report will be presented to Council in due course for all three stages of the redevelopment.

#### 2. BACKGROUND

- 2.1 The Papaioea Place project is a social housing redevelopment project that is delivered through a design and build contract between Palmerston North City Council (Principal) and Latitude Homes (Contractor) of New Plymouth.
- 2.2 Papaioea Place Stages 1 and 2 have already been delivered on the site. This saw the demolition of the old 48 housing units which were no longer fit for purpose and replaced with 78 new units along with supporting infrastructure.
- 2.3 Stage 3 of the project will see a further seven units and a tenant lounge being constructed in the centre of the site. It is funded through Programme 1743 – Social Housing – Papaioea Stage 3.
- 2.4 Site meetings and Project Control Group meetings are held each month and this report is a summary from the July 2023 meeting.

### 3. PROJECT UPDATE – UP TO 31 JULY 2023

#### Health and Safety

- 3.1 There were no new health and safety incidents reported since the last report.
- 3.2 For context, there have been only three Health and Safety 'near misses' to date for the life of the project over all three stages of the development.

#### Programme Update

- 3.3 Construction of the final seven units was completed in April 2023. Three of these units were the standard accessibility-friendly units consistent with the balance of the complex, whereas four of these units had a slightly larger footprint and were built to be fully accessible. This was a consent requirement.
- 3.4 Construction of the tenant lounge at the centre of the complex commenced as planned, however, has seen a circa 15-week delay, now forecast for completion in October 2023. The delays to the lounge were the result of adverse weather when completing earthworks, and a minor redesign of the structural foundation posts and steel framing which also required a revised building consent.
- 3.5 The activities to be undertaken in August 2023 will include completion of the tenant lounge roofing, internal framing, and lining, as well as the roading reinstatement works.

#### Financial

- 3.6 There is an approved Programme Budget for Stage 3 of \$4.2M incl. GST.
- 3.7 With a year-to-date spend of circa \$2.9M incl. GST, and despite the delays, Stage 3 continues to track within budget.

### 4. NEXT STEPS

- 4.1 Council officers will continue with the construction of Stage 3 of Papaioea Place as per construction programme.

### 5. COMPLIANCE AND ADMINISTRATION

Does the Committee have delegated authority to decide?	<b>Yes</b>
Are the decisions significant?	<b>No</b>
If they are significant do, they affect land or a body of water?	<b>No</b>
Can this decision only be made through a 10 Year Plan?	<b>No</b>
Does this decision require consultation through the Special Consultative procedure?	<b>No</b>

Is there funding in the current Annual Plan for these actions?		<b>Yes</b>
Are the recommendations inconsistent with any of Council's policies or plans?		<b>No</b>
The recommendations contribute to Goal 3: A Connected and Safe Community		
The recommendations contribute to the achievement of action/actions in Connected Communities		
The action is: Upgrade the Papaioea housing complex.		
Contribution to strategic direction and to social, economic, environmental, and cultural well-being	<p>The Papaioea Place Redevelopment will:</p> <ul style="list-style-type: none"> <li>• Increase Council's social housing to help meet the demand for this type of housing and reduce the housing waiting list.</li> <li>• Improve the housing condition of the complex by replacing the old units; and</li> <li>• Provide a complex that delivers on the Social Housing Plan.</li> </ul>	

## ATTACHMENTS

Nil



## COMMITTEE WORK SCHEDULE

TO: Community Committee

MEETING DATE: 9 August 2023

TITLE: Committee Work Schedule - August 2023

### RECOMMENDATION TO COMMUNITY COMMITTEE

1. That the Community Committee receive its Work Schedule dated August 2023.

#### COMMITTEE WORK SCHEDULE – AUGUST 2023

Estimated Report Date	Subject	Officer Responsible	Current Position	Date of Instruction & Clause number
<del>9 August 2023</del>	<del>Feasibility of introducing a Companion Card for those with permanent disabilities – 12-month review</del>	<del>Chief Customer Officer</del>	<del>Affected by Covid – trial extended to the new year</del>	<del><u>5 August 2020</u> <u>Clause 34.4</u></del>
<del>9 August 2023</del> 22 November 2023	Review of Sector Leads trial	Chief Customer Officer	Too early - original report indicate due late 2023	<u>8 June 2022</u> <u>Clause 7-22</u>
<del>9 August 2023</del>	<del>Papaioea Place Redevelopment Six Monthly Update</del>	<del>Chief Infrastructure Officer</del>		
<del>9 August 2023</del> 22 November 2023	Opportunity to establish a natural burial cemetery in the Manawatū - Progress report	Chief Infrastructure Officer	Resource constraints/ pending external advice	<u>Council 1</u> <u>June 2022</u> <u>Clause 60-22</u>
<del>9 August 2023</del>	<del>Implications on extending free parking for Gold Card Holders and/or Community Service</del>	<del>Chief Financial Officer/Chief Customer Officer/Chief</del>		<del><u>24 May 2023</u> <u>Clause 15-23</u></del>

	<del>Card Holders</del>	<del>Planning Officer</del>		
27 September 2023	Addressing Home Insecurity (Night Shelter) - Update Report	Chief Customer Officer		<a href="#">15 March 2023</a> <a href="#">Clause 10-23</a>
27 September 2023	Annual Report - Community Funding Allocation 2022/23	Chief Customer Officer		<a href="#">Rec 1c of the Community Grants &amp; Events Funding Review - May 2021</a>
22 November 2023	Disability Reference Group - Annual Presentation	Chief Customer Officer		<a href="#">Invitation to present 4 November 2020</a> <a href="#">Clause 41-20</a>
22 November 2023	Community Reference Groups - Terms of Reference Review	Chief Customer Officer		<a href="#">1 December 2021</a> <a href="#">Clause 24-21</a> <a href="#">Terms of Reference 1.5</a>
22 November 2023	Social Housing Programme - Progress Report	Chief Infrastructure Officer		<a href="#">15 March 2023</a> <a href="#">Clause 11-23</a>
Early 2024	Develop a City Wide Food Resilience and Security Policy	Chief Planning Officer		<a href="#">31 May 2023</a> <a href="#">Clause 88.10-23</a>
Early 2024	Develop a Community Housing Partnership Plan	Chief Customer Officer/ Chief Planning Officer		<a href="#">31 May 2023</a> <a href="#">Clause 88.9-23</a>
Early 2024	Welcoming Communities - Annual Report	Chief Customer Officer		<a href="#">4 November 2020</a> <a href="#">Clause 43-20</a>
Early 2024	Pasifika Reference Group - Annual Presentation	Chief Customer Officer		
Early 2024	Seniors Reference Group - Annual Presentation	Chief Customer Officer		



Early 2024	Annual Sector Lead Reports - Housing Advice Centre Manawatū Multicultural Centre Te Pū Harakeke - Community Collective Manawatū Te Tihī o Ruahine Whānau Ora Alliance	Chief Customer Officer		<a href="#">Terms of Reference</a>
Early 2024	Community Spaces Feasibility Study - to include Libraries, Pasifika Hub and community space in Highbury	Chief Planning Officer		<a href="#">31 May 2023 Clause 88.14-23</a>
Early 2024	Develop an Age Friendly Plan	Chief Customer Officer/ Chief Planning Officer		<a href="#">31 May 2023 Clause 88.15-23</a>
Early 2024	Annual Report on Library Services	Chief Customer Officer		<a href="#">24 May 2023 Clause 22-23</a>