

|  |
| --- |
| Review of class 4 gambling:Submissions summaryPublically released July 2017 |
|  |

Contents

[1. Executive summary 1](#_Toc474833333)

[1.1. Review of class 4 gambling 1](#_Toc474833334)

[1.2. Main points raised in the summary of submissions 2](#_Toc474833335)

[2. Introduction 6](#_Toc474833336)

[2.1. Background to consultation 6](#_Toc474833337)

[2.2. About this summary 7](#_Toc474833338)

[3. Legislative restrictions on the class 4 sector 9](#_Toc474833339)

[3.1. Are the purposes of the Gambling Act 2003 still fit-for-purpose? 9](#_Toc474833340)

[3.2. Do you think the recent stabilisation of class 4 expenditure is due to economic/population changes or changes within the class 4 sector? 10](#_Toc474833341)

[3.3. Do you think any changes should be made to the statutory requirements on the class 4 sector? 11](#_Toc474833342)

[3.4. What would the impact of any changes be on the responsibility to prevent and minimise harm from gambling? 13](#_Toc474833343)

[3.5. Does the Act go far enough in ensuring funds to communities are maximised? 14](#_Toc474833344)

[4. The role of local government through local venue policies 15](#_Toc474833345)

[4.1. What should be the role of local authorities in balancing the benefits of class 4 funding with potential negative impacts? 15](#_Toc474833346)

[4.2. Are there any requirements in the Gambling Act related to venue policies that should be changed? 17](#_Toc474833347)

[4.3. Is requiring councils to review their venue policies every three years a good policy? 18](#_Toc474833348)

[4.4. How have local class 4 venue policies impacted on both problem gambling and sustainability of grant funding? 20](#_Toc474833349)

[5. The Department’s regulatory functions and the cost of regulating gambling 21](#_Toc474833350)

[5.1. What influence do the Department’s regulatory functions and operational policies have on the sustainability of funding to communities? 21](#_Toc474833351)

[5.2. Do you think the cost of regulating the C4 sector is reasonable? 22](#_Toc474833352)

[5.3. Are there ways of effectively regulating the sector at less cost? 22](#_Toc474833353)

[5.4. What areas should the regulator focus on to reduce unwanted and illegal behaviour and problem gambling rates? 24](#_Toc474833354)

[5.5. Are there more efficient methods of recovering costs from the class 4 sector than the current machine-number based model? 25](#_Toc474833355)

[6. Problem gambling 26](#_Toc474833356)

[6.1. What is your experience of any changes in harmful gambling behaviour over time? 26](#_Toc474833357)

[6.2. What is your view on the class 4 sector’s approach to problem gambling? 27](#_Toc474833358)

[6.3. Do you have suggestions for how problem gambling could be reduced or better managed? 28](#_Toc474833359)

[7. Non-club class 4 gambling sector 33](#_Toc474833360)

[7.1. Is there an optimum number of non-club societies? 33](#_Toc474833361)

[7.2. What criteria do you think should be considered to determine the optimum number of non-club societies? 33](#_Toc474833362)

[8. Non-club venues and their relationship with non-club societies 34](#_Toc474833363)

[8.1. Do you think the relationship between venues and societies can create problems? 34](#_Toc474833364)

[8.2. Is competition for venues between societies desirable? 34](#_Toc474833365)

[8.3. Are there alternative approaches to the venue/society relationship that may reduce problems? 34](#_Toc474833366)

[8.4. What changes in the commercial environment for venues may have implications for their ability to host class 4 gaming machines? 35](#_Toc474833367)

[9. Clubs 36](#_Toc474833368)

[9.1. Should clubs be supported to remain sustainable? 36](#_Toc474833369)

[10. Class 4 funding – minimum rate of return 38](#_Toc474833370)

[10.1. Is a minimum rate of return the best way to maximise funds to the community? 38](#_Toc474833371)

[10.2. Can you suggest alternatives to a minimum rate of return to maximise community returns? 38](#_Toc474833372)

[11. Class 4 funding – Grants process 39](#_Toc474833373)

[11.1. What is your experience of the grants process? 39](#_Toc474833374)

[11.2. Do you think the grants process is accessible for everyone? 39](#_Toc474833375)

[11.3. How efficient do you think the process is? 39](#_Toc474833376)

[11.4. How fair and transparent do you think the process is? 40](#_Toc474833377)

[11.5. Do you have any suggestions for changes that would benefit the community’s ability to gain grants funding? 40](#_Toc474833378)

[12. Class 4 funding – Distribution of grants funding 43](#_Toc474833379)

[12.1. What are your views on the current legislative settings around societies’ authorised purposes? 43](#_Toc474833380)

[12.2. Do you think funding from class 4 gambling is achieving the maximum impact for communities? 43](#_Toc474833381)

[12.3. What could change for funding to achieve the maximum impact for the community? 44](#_Toc474833382)

[12.4. Should societies return funds to the communities where they are generated? 45](#_Toc474833383)

[12.5. Overall, do you think the distribution of funding is equitable? 45](#_Toc474833384)

[13. Online gambling 47](#_Toc474833385)

[13.1. Do you think the current policy settings for online gambling are fit-for-purpose? 47](#_Toc474833386)

[13.2. If not, how do we need to change the policy settings? 47](#_Toc474833387)

[13.3. Do you think other forms of gambling should be available online in New Zealand? 48](#_Toc474833388)

[13.4. Do you think class 3 gambling operators should be able to offer online lotteries? 48](#_Toc474833389)

[14. Further issues/ideas 49](#_Toc474833390)

[14.1. Are there issues or questions not set out in this discussion paper that you think need to be considered in this review? 49](#_Toc474833391)

[Appendix A: List of submitters 50](#_Toc474833392)

# Executive summary

Review of class 4 gambling

Since the establishment of the Gambling Act 2003 (Gambling Act), a combination of factors have led to a decrease in class 4 gambling expenditure, and a corresponding decrease in grants being made to community organisations.

In September 2015, the Government decided to review the class 4 gambling system to determine whether it remains fit-for-purpose.[[1]](#footnote-2) The Department of Internal Affairs (the Department) then undertook initial work on the review. However, feedback from the sector requested that the Department gain more sector input for the review. As a result of the sector feedback, and in order to gain the varied perspectives from a range of stakeholders, the Department released a discussion document in June 2016 which asked questions on various aspects of the class 4 gambling system.[[2]](#footnote-3) This document summarises the submissions that were received in response.

The following stakeholders made a total of 747 submissions:

* clubs (21 submissions);
* gambling help and health providers (19 submissions);
* grant recipients (551 submissions);
* individuals (56 submissions);
* local government (nine submissions);
* other entities (29 submissions);[[3]](#footnote-4)
* class 4 societies (societies) (29 submissions); and
* venues (33 submissions).

The number and variety of responses shows a high degree of interest in the various aspects of class 4 gambling. While there was often a lot of agreement within a group of submitters (for example, clubs), their views would often conflict with the views of other groups of submitters (for example, grant recipients and gambling help and health providers). The nature of class 4 gambling is that there are many different perspectives on the relative level of its harms and benefits.

Main points raised in the summary of submissions

Submitters focused particularly on section 3 (legislative restrictions), section 4 (role of local government), section 5 (the Department’s regulatory functions), section 6 (problem gambling) and sections 10-12 (class 4 funding to communities). As these are the sections which had the most interest, included varied suggestions for change, and conflicting views between submitters, they are discussed below in this executive summary.

We also acknowledge the submissions received on the overall structure of the class 4 sector,[[4]](#footnote-5) online gambling and additional points raised. These submissions are discussed in more detail in their own sections in this document.

### Section 3 – legislative restrictions

Many submitters, particularly grant recipients and class 4 operators,[[5]](#footnote-6) proposed that “sustainability of the sector” or “sustainability of community funding” be included as a purpose in the Gambling Act. However, other submitters considered the purposes of the Gambling Act were already fit for purpose.

Many submitters considered that expenditure was declining long term. Grant recipients, in particular, were concerned about the impact of declining community funding.

Class 4 operators had some suggestions for changes that they considered could increase gambling expenditure, with little impact on gambling harm. These included increasing machine numbers, increasing prize limits and having a class 4 system that encouraged investment by the operators.

A number of submitters did not consider the Gambling Act maximises community funding, and made suggestions for change.

### Section 4 – role of local government

A number of submitters (including local government) supported the role of local government in setting venue policies, while some had criticisms of the process. Some submitters supported greater powers for local government in granting and withdrawing fixed term licences for venues, which they considered would encourage better host responsibility. Alternatively, several submitters considered that venue policies could be set at a national level, rather than a local level. Submitters pointed out concerns they had with how local government was undertaking its role.

Submitters, particularly among class 4 operators and grant recipients, made suggestions about information that local government should use, and matters that should be considered, when reviewing venue policies. Submitters variously wanted local government to consider the benefits of community funding (class 4 operators and grant recipients), or the harms of problem gambling (gambling help and health providers).

Submitters suggested changes to venue policies. Class 4 operators wanted these to allow for venue relocations and mergers. Other submitters suggested harm minimisation practices should be required in venue policies.

Class 4 operators considered that the venue policies, in particular, “sinking lid” policies had a negative impact on community funding, without a positive impact on preventing and minimising gambling harm. Other submitters, predominately gambling help and health providers, considered venue policies could have a positive impact on preventing harm, which could take some time to take effect. Some submitters also considered that reducing community funding was a necessary result of reducing gambling spending (and therefore, reducing gambling harm).

### Section 5 – the Department’s regulatory functions

Submitters, mostly among class 4 operators and grant recipients, considered the Department’s regulatory functions had a negative impact on community funding. Their view was that regulation cost borne by class 4 operators is too high and reduces funding to communities. Alternatively, a number of grant recipients were in favour of the Department’s regulatory approach as it helped maintain a fair system.

Submitters, again mostly class 4 operators and grant recipients, considered the Department’s cost for regulating the sector are too high. Many submitters suggested the regulation be more cost-effective, or that there be less regulation. Suggestions ranged from the general to the highly specific, including using software for automatic reporting, or having fewer societies.

Submitters suggested a range of measures for the Department to focus on problem gambling, including requiring pre-commitment technology or taking a stronger approach to enforcement and penalties. Submitters also suggested measures to reduce unwanted and illegal behaviour in class 4 operators, such as limiting new entrants to the sector.

Some submitters suggested alternative ways to recover costs from class 4 operators. These ranged from charging flat fees to fees as a percentage of turnover or profit.

### Section 6 – problem gambling

Submitters expressed concern that gambling statistics are not able to present a full picture of problem gambling, as the statistics only measure those seeking help. Some individuals shared their personal experiences of problem gambling and the effects it had on them and their families.

Many class 4 operators and grant recipients considered that venues were taking their host responsibilities seriously and had a good approach to problem gambling.

Other submitters were concerned that the approach was inconsistent, or that the approach was generally not working well. These submitters were concerned about the lack of staff training, the low priority given to harm minimisation and the conflict for venues between minimising harm and providing community funding. A number of submitters referred to the negative results from the mystery shopper exercise undertaken by the Department in 2014.

Submitters had many different ideas for reducing problem gambling. Gambling help and health providers made suggestions which included specific rules around money or time spent and education of the public and venues. Some submitters discussed making venue exclusions more effective for problem gamblers, and more efficient for venues to administer. Some submitters suggested either incentives for good host behaviour, or strong penalties for poor host behaviour.

### Sections 10-12 – class 4 community funding

Submitters were divided over whether the minimum rate of return had a positive or negative impact on community funding. Some submitters (mostly among grant recipients) considered it provided a guaranteed return. Other submitters (mostly class 4 operators, but also some grant recipients) were concerned that smaller venues were forced to close as they could not meet the minimum rate of return. Submitters made various suggestions as alternatives, mostly around lowering the minimum rate or return, or having a tiered rate of return.

Mostly grant recipients responded to the questions about the grants process. Most of those submitters considered that the grants process was accessible, fair and transparent, efficient and equitable. However, some were concerned that societies were inconsistent; with some having inefficient processes requiring too much administration.

Submitters, about half of them grant recipients, made suggestions for changes to the grants process to improve the community’s access to funding. These included practical matters around simplifying the grants process and changes to other aspects of the class 4 sector that could increase gambling expenditure and funding available. Some submitters also discussed the matters they considered were working well and did not want to change. There was a strong theme in favour of having local societies making decisions about community funding, rather than any centralised system of allocating funding. However, a number of submitters were in favour of consistent processes and a centralised database to streamline applications processes.

There was some concern about the authorised purposes provisions, as many grant recipients considered they allow “special purpose” trusts to be established. Funding can then be directed towards a single or small group of, recipients. A number of submitters particularly noted the ability of the New Zealand Racing Board to return funds to racing, rather than the wider community. A smaller group of submitters were comfortable with the current provisions.

One of the questions asked submitters if they believed funding was achieving maximum impact for communities. This created a mix of responses. However, nearly every submission from a grant recipient contained a statement about the worth of the funding they had received for their organisation, what had been achieved with it or what outcomes had been reached. It is clear that a large number of community groups of different types rely on the funding from class 4 gambling.

A large number of submitters provided their views on whether class 4 gambling expenditure should be returned to the local community where it has been raised. Of the submitters who were not grant recipients, most considered that funds should be returned to local communities. Submitters were particularly concerned about expenditure coming from low socio-economic areas, but funding subsequently being provided to higher socio-economic areas.

About half the submitters were grant recipients and they were more hesitant about a strict rule for local return. Many submitters were in favour, but noted that national and regional bodies can provide services and support to local communities. Others were concerned a local return rule could lead to a mismatch of areas with available funding and areas of need. In particular, rural areas could miss out.

A number of submitters considered that overall, the distribution of funding is inequitable. They were concerned about societies providing funding to a narrow range of purposes, and the large amount of money provided to sporting groups compared with other community groups. Other submitters considered that the distribution was generally equitable.

# Introduction

Background to consultation

Since the establishment of the Gambling Act, a combination of factors have led to a decrease in class 4 gambling expenditure, and a corresponding decrease in grants being made to community organisations.

Grant funding to community organisations from non-club societies reduced from $389 million in 2004 to $262 million in 2015 in real (inflation-adjusted) terms, a decline of 33 per cent. Grant funding from class 4 gambling has been relatively stable in recent years.

The Government decided to review the framework for managing class 4 gambling to determine whether it remains fit-for-purpose. The objectives of the review are to look at:

* the long-term sustainability and effective allocation of funding to communities without driving a growth in gambling;
* whether the Gambling Act is still fit-for-purpose;
* whether the class 4 sector can be regulated more cost-effectively; and
* preventing and minimising harm from gambling.

The Department released a discussion document for public consultation between June and August 2016. The consultation sought views on how community funding from class 4 gambling could be sustained into the future, the issues and challenges facing the class 4 sector and community funding, and ideas on how things might be improved. Ideas were sought for a cost effective regulatory model for the sector, and views on the future of online gambling in New Zealand. The discussion document contained 49 questions covering these issues.

### Submissions received

The following stakeholders made a total of 747 submissions:

* clubs (21 submissions);
* gambling help and health providers (19 submissions);
* grant recipients (551 submissions);
* individuals (56 submissions);
* local government (9 submissions);
* other entities (29 submissions);
* societies (29 submissions); and
* venues (33 submissions).

Figure 1 below shows the number of submitters by stakeholder category. Grant recipients are excluded from the table, simply because if they are included, comparison with other categories is difficult. Submissions from grant recipients were 74 per cent of all submissions received.

Figure : Number of submitters by category (excluding grant recipients)

The level of response is very encouraging. It shows a great deal of interest in the class 4 sector from those who interact with it.

About this summary

The structure of this summary generally follows that of the discussion document. Questions from the discussion document are used as headings. Comments from submitters are summarised under the question which they most relate to. In some cases comments have been “moved” from the question the submitter answered to another relevant question.

In some places we indicate the number of submitters commenting on a particular question. This is indicative only, as single submissions from representative bodies (for example, the Class 4 Working Party, Clubs New Zealand and Hospitality New Zealand) were endorsed by multiple members. We have identified where representative bodies have made submissions to indicate this support. Clubs New Zealand’s submission was explicitly supported in full by 11 clubs and in part by four clubs. Hospitality New Zealand National’s submission was explicitly supported by 14 venues.

There were a number of “group submissions” from multiple grant recipients; submissions that were substantially identical (though they may have included specific information about each submitter). There were five types of these group submissions, with 128 (recipients of grants from the ILT Foundation), 114 (various sports groups), 81 (various sports groups), 43 (bowling clubs), 19 (various sports groups) and seven (various sports groups) submitters respectively. In each case, a group submission is noted in the summary as one submitter.

Where clear patterns exist, we note positions taken consistently by particular categories of stakeholder (for example, societies, venues, clubs, local government, gambling help providers, or grant recipients).

While some numbers are included to show the level of support for a particular position, this summary is not intended to be read as a “referendum”. Rather, the value of this document is in the various ideas raised, and how it contributes to an understanding of what different stakeholders are interested in, or concerned about.

# Legislative restrictions on the class 4 sector

The Gambling Act establishes the regime under which societies operate. The purpose of the Gambling Act is to:

* control the growth of gambling;
* prevent and minimise harm from gambling, including problem gambling;
* authorise some gambling and prohibit the rest;
* facilitate responsible gambling;
* ensure the integrity and fairness of games;
* limit opportunities for crime or dishonesty associated with gambling and the conduct of gambling;
* ensure that money from gambling benefits the community; and
* facilitate community involvement in decisions about the provision of gambling.

Are the purposes of the Gambling Act 2003 still fit-for-purpose?

Twenty-eight submitters (across all stakeholders) considered that the purposes of the Gambling Act are largely fit-for-purpose. In particular, some submitters supported the purpose of preventing and minimising the harm caused by gambling.

Some submitters, including 32 grant recipients, considered that the purposes of the Gambling Act do not reflect the current modern gambling landscape. Submitters referred particularly to online gambling.

In addition, 97 submitters (across all stakeholders) considered that the purposes of the Gambling Act should include “a sustainable class 4 sector” or “sustainable community returns.”[[6]](#footnote-7) Submitters, particularly grant recipients, were concerned about the decline in community funding and wanted this addressed in the purpose of the Act. Some considered there should be a statutory definition of a “sustainable class 4 sector”. A number of these submitters also considered that there should be strategies in place to minimise harm from problem gambling.

Six societies proposed that the current purpose to “control the growth of gambling” be either deleted or better defined. These submitters were concerned that this purpose conflicts with having a sustainable class 4 sector. Some submitters suggested 20,000 gaming machines (which was the number of machines in 2008) as a possible national limit.[[7]](#footnote-8) Other submitters suggested 16,500 machines as a national limit.[[8]](#footnote-9)

Three submitters considered that “sustainability of the sector” should not be included as a purpose of the Gambling Act, and that the focus of the Act should remain on minimising harm.

Do you think the recent stabilisation of class 4 expenditure is due to economic/population changes or changes within the class 4 sector?

Eighty-three submitters (across all stakeholders) responded to this question. The majority of submitters believed expenditure was declining in the long term.[[9]](#footnote-10) Grant recipients were very concerned about the effect of the downward trends on community funding.

Fifty submitters (primarily grant recipients, societies and venues) disagreed that class 4 gambling expenditure had stabilised.[[10]](#footnote-11) Some submitters[[11]](#footnote-12) considered that the financial figures did not provide an accurate indication that class 4 gambling expenditure has stabilised, as expenditure had been declining for eight years, and has increased for only one.[[12]](#footnote-13) These submitters also noted that trends in expenditure varied across the country, with expenditure in rural areas continuing to decline.[[13]](#footnote-14)

Some submitters considered that changes in regulating the class 4 sector had an impact on the trends, while others considered it was both changes in the sector and economic or population changes.

Eighteen submitters considered that any recent increase in expenditure was due to economic and population changes such as the increase in tourism and a strong economy.

Submitters also identified other drivers for the decline in class 4 expenditure:

* increasing awareness of the harmful nature of class 4 gambling;
* the popularity of other gambling, including online gambling;
* competing economic pressures on gamblers, with the increases in the cost of living not matched by wage increases; and
* entertainment alternatives to gambling.

A gambling help and health provider noted while expenditure may have stabilised or decreased, problem gambling prevalence remains steady. Another submitter considered that the cause was not as important as the consequences.

Do you think any changes should be made to the statutory requirements on the class 4 sector?

Submitters across all stakeholders responded to this question. Responses are summarised thematically below.

### Increase machine numbers

A number of submitters wanted the ability to increase the number of gaming machines within a venue, which they linked with the sustainability of funding.[[14]](#footnote-15) These submitters stated that the total number of machines is decreasing, which is having negative repercussions for the sector and the financial returns for communities.

Some suggestions that these submitters put forward were:

* Societies should have the ability to move machines between venues.[[15]](#footnote-16)
* There should be more flexibility around the total number of machines allowed.
* Local authorities could set the number of machines by looking at the community funding needs, and work out how many machines would achieve this.

### Increase bets and prize limits

Submitters also focused on prize limits, noting that prizes were low compared to other countries and to other forms of gambling (for example, casinos, Lotteries, Instant Kiwi, and overseas online gambling).

Eleven submitters (primarily clubs and societies) considered that New Zealand should align its bets and prizes with an Australian state, possibly Queensland.[[16]](#footnote-17) The reasons given were that the increases were modest, but they would assist with the sustainability of the sector. The other advantage seen by submitters was that gaming machines designed for Queensland’s market could be purchased more cheaply.

Submitters (across all stakeholders) also favoured multi-venue linked jackpots.[[17]](#footnote-18) Some of these submitters believed they could reduce harm by reducing the temptation to continue playing when getting near to the jackpot. Another submitter considered that linked jackpots would assist lower turnover venues.

### Increase advertising

Submitters wanted greater ability to advertise.[[18]](#footnote-19) Three societies considered that the ability to put out a “sandwich board” was insufficient advertising, and two further societies noted the difference in advertising rules between the class 4 sector and other forms of gambling. Some submitters (primarily grant recipients and societies) believed that if societies could better advertise and promote themselves, they could potentially raise community awareness in relation to community funding opportunities as a result of gaming machine activities.

### Payment method

Some submitters discussed the use of cash in class 4 gambling. Some submitters considered that $50 notes and/or $100 notes should be allowed.[[19]](#footnote-20) One society considered that payment should be able to be made by EFTPOS or by text message.

### Lack of investment

Some submitters were concerned about the lack of investment in gaming machines or new technology. In relation to the machines, submitters:

* noted that casinos had newer machines than class 4 gambling venues;
* suggested leasing machines, instead of buying them, enabling a greater offering of games at less cost;[[20]](#footnote-21) and
* considered that societies should be able to fund purchases of machines from equity, instead of having to borrow money.[[21]](#footnote-22)

Clubs New Zealand suggested that cloud technology should be used to enable frequent turnover of games.

### Consolidation of the sector

Some submitters considered there should be a consolidation in the sector to allow for economies of scale. For example, some submitters supported a moratorium on issuing new licences:

* to allow for consolidation;
* because of concern about the integrity of the funds allocation process and the licensing of special interest groups; and
* to allow time for recent law changes from the Gambling Amendment Act 2015 (the no. 2 Bill”) Gambling Amendment Act (No. 2) 2015 (“the no. 3 Bill”) and the Gambling (Gambling Harm Reduction) Amendment Act 2013 (“the Flavell Bill”) to take effect.

In contrast, some submitters did not want to limit new gaming societies.[[22]](#footnote-23) One society considered that preventing new entrants to the sector would reduce service levels, reduce options for funding and stifle innovation.

### Maintain or increase restrictions

Some submitters considered there should continue to be such restrictions as limited advertising, jackpot limits, features that interrupt play and a restricted number of gaming machines at a venue.

Several submitters considered there should be greater restrictions on the sector. Examples of these were:

* Harm minimisation proposals that the Department has consulted on should be accepted, such as removing the maximum bet button.
* Class 4 gambling should only occur on licenced premises, which already have host responsibilities through liquor licensing laws.
* Gaming machines should only be allowed in areas zoned for business, not in residential areas.
* Increased host responsibility requirements.
* Remove class 4 gambling altogether.

### No changes

In contrast, nine grant recipients considered that no changes were needed to the statutory requirements on the class 4 sector.

What would the impact of any changes be on the responsibility to prevent and minimise harm from gambling?

Submitters across all stakeholders replied to this question. Seventeen submitters considered that changes they proposed would not result in increased harm from class 4 gambling,[[23]](#footnote-24) while seven submitters (primarily gambling help and health providers) believed their suggested changes would reduce harm. Four additional submitters believed that the recent changes to venue payments would help with harm minimisation.

A few submitters considered that a decrease in gaming machine numbers would not cause a decrease in problem gambling.[[24]](#footnote-25)

Does the Act go far enough in ensuring funds to communities are maximised?

Submitters across all stakeholders responded to this question. Responses are summarised thematically below. A few grant recipients answered “no”, but did not make suggestions for change.

### Machine numbers

Nine venues considered that as areas lose gaming machines, the amount of grant funding to community organisations declines. Ten submitters considered that sustainable funding requires sustainable venue numbers, or machine numbers, or both.

### Compliance and other costs

Six submitters (grant recipients and societies) were concerned that compliance costs, such as increased fees for the Department’s regulatory functions, reduced grant funding to community organisations. A number of grant recipients suggested that reducing the various taxes, in particular the gaming duty, would increase the funding to communities.

### Minimum rate of return

Some submitters (societies and venues) considered that the minimum rate of return had the unintended consequence of reducing grant funding because it had resulted in the closure of lower value (typically rural) venues.[[25]](#footnote-26) These submitters suggested the minimum rate of return should be removed.

### Narrow purpose trusts

A number of grant recipients were concerned about trusts with narrow purposes or single beneficiaries. This is discussed further under the question about authorised purposes.

### An alternative view

In contrast, one individual considered that a reduction in the availability of community funding over time is to be expected.

# The role of local government through local venue policies

One of the purposes of the Gambling Act is to facilitate community involvement in decisions about the provision of gambling. Local class 4 venue policies allow councils and communities the opportunity to have a say on the location of class 4 venues, and whether more gaming machines or venues can be established. Class 4 venue policies vary across the 67 different councils.

What should be the role of local authorities in balancing the benefits of class 4 funding with potential negative impacts?

Submitters across all stakeholders responded to this question. Responses are summarised thematically below.

### Support for current role of local authorities

Twenty-seven submitters supported the current role of local authorities in class 4 gambling. Ten submitters (primarily gambling help and health providers and local government) considered that measures such as “sinking lid” policies and control over the location and establishment of venues were effective in balancing the benefits and harm of class 4 gambling.

Nineteen submitters considered that local authorities should have an expanded role in the class 4 sector. These submitters argued that if local authorities were allowed greater control, they could phase out harmful venues and practices. Some of these submitters also argued that local authorities should have a role in deciding how funds are distributed.

### Concerns about the role of local authorities

In comparison, 46 submitters had concerns with the way that local authorities made decisions relating to the class 4 sector.[[26]](#footnote-27) Some submitters were concerned that local authorities do not have sufficient information or research, such as how to prevent and minimise gambling harm, to make decisions regarding the sector. Other submitters considered that it was a waste of money replicating policies across different councils. Some noted that local authorities themselves can receive grants funding, which creates a potential conflict of interest.

For the above reasons, 10 submitters questioned whether local authorities should have any role in class 4 gambling. Most suggested that the Department could assume this role, with one submitter suggesting it be undertaken an independent body.

A number of submissions focused on restricting local authorities’ abilities to make policies and decisions about venue location, including:

* setting venue zones and number of venues in a district;
* setting location of venues; and
* allowing venue mergers.

These submitters considered that central government, rather than local government, should set the total number of machines at a national level.[[27]](#footnote-28)

Currently, clubs can increase gaming machine numbers from 9 to 18 or operate up to 30 machines in a merger, with consent of the Minster and local authority. However, several clubs believed that only the Minister should need to provide consent, not the local authority.[[28]](#footnote-29)

### Greater local authority power to grant and withdraw licences

Eleven submitters (primarily gambling help and health providers and local authorities) recommended that venues be granted fixed term licences, and that local authorities hold hearings as to whether the venue licence should continue. These submitters believed that this could make local authorities better able to address the number of gaming machines in deprived areas. A local authority or the Department could have the power to withdraw a venue’s licence when it has poor host responsibility or has caused significant harm, for example.

Other suggestions included that the local authority:

* be the regulator instead of the Department;
* extend the powers of alcohol inspectors to include class 4 gambling regulation;
* have the power to inspect venue operations; and
* hear liquor and gambling license applications together, allowing the same level of community and police engagement and a coordinated approach.

Several grant recipients were concerned that local authorities might be given responsibility to distribute community funding, and were opposed to this.

### Information for local authorities

Some submitters (primarily societies) considered that central government should provide local authorities with greater guidance for a more consistent approach.[[29]](#footnote-30) These submitters also focused on information local authorities need to undertake their role. Examples of these were:

* information on the legislative and social need to prevent and minimise gambling harm;
* data on the level of community funding from class 4 gambling in each territorial authority area;
* information about poor harm minimisation practices at venues; and
* health impact assessments.

### Matters local authorities need to consider when making decisions

Some submitters (primarily societies, clubs and grant recipients) wanted local authorities to consider the benefits of the funding from class 4 gambling. For example:

* consider the funding contribution that class 4 gambling provides to their community;[[30]](#footnote-31)
* have regard to a sustainable class 4 sector in making their decisions;[[31]](#footnote-32)
* investigate how much is spent on class 4 gambling, how much funding is granted and to which projects; and
* consider where substitute funding would come from, if there were a reduction in venues.

In comparison, seven submitters (primarily gambling help and health providers) wanted local authorities to consider the potential harm from class 4 gambling. For example:

* giving appropriate weight to the potential harms caused by gambling; and
* being mindful of their conflicts of interest.

Are there any requirements in the Gambling Act related to venue policies that should be changed?

Submitters across all stakeholders responded to this question. One local government submitter considered there should be no changes to the requirements in the Gambling Act about venue policies. All other submitters who responded to this question made suggestions for changes. Responses are summarised thematically below.

### Relocation of venues

One of the main themes in submissions was relocation of venues. Twenty-six submitters (clubs, societies and venues) believed relocations should be allowed.[[32]](#footnote-33) Some of their reasons were:

* relocation assists sustainability of the sector;
* venues need to move for various reasons, including earthquake strengthening, ageing venues and changing purposes of venues;
* it allows venues to move out of deprived areas; and
* landlords can take advantage of situations where a venue cannot move.

### Consolidation

Five submitters[[33]](#footnote-34) considered that consolidation of venues should be permitted to the same machine maximums, as with clubs. One society considered that consolidation should be a permitted activity. Submitters considered this would improve efficiencies and professionalism. It would also allow the commercial hospitality sector to better compete with the club sector.

### Harm minimisation measures at venues

Some submitters considered that venue policies should include various harm minimisation measures. For example, some of the possible actions put forward were:

* lowering the number of gaming machines in low socio-economic areas to minimise harm for those most at risk;
* requiring sound and visual restrictions at venues. For example, machines should not be audible beyond the property boundary;
* an application for a venue should include the proposed harm minimisation policy for the venue;
* the onus on demonstrating minimal harm from gambling activities should rest with the applicant; and
* venues should have facial recognition technology to identify problem gamblers.

Is requiring councils to review their venue policies every three years a good policy?

Submitters across all stakeholders commented on this question. Responses are summarised thematically below.

### Three years is about right

Twenty-two submitters (including gambling help and health providers, individuals, local government and grant recipients) considered that three years was appropriate. The reasons given included:

* the timeframe was not onerous;
* it provides stakeholders and communities with the opportunity to input;
* it was an appropriate time to collect and analyse data, and consult the community; and
* it aligns with the election cycle and keeps gambling relevant to newly elected representatives.

### More time between reviews

Nineteen submitters (primarily local government, societies and grant recipients) considered that the review period should be extended to five years. Some submitters noted the three year timeframe was out of line with other policies such as the Building Act and new bylaws (which are to be reviewed on a five year cycle) and ongoing bylaws (ten year cycle). Others suggested the review would be more meaningful and appropriate if it aligned with planning cycles of local government and business operators.

Submitters also preferred a five year review cycle as:

* it would reduce costs;
* less frequent times were justified as the number of people participating in class 4 gambling is decreasing; and
* overly frequent reviews can be less robust.

Five submitters considered the time between reviews should be longer, without specifying a particular length of time. In addition to some of the reasons set out for extending to a five year review, submitters said:

* there is no evidence that the policies need to be every three years as change is slower;
* reviews represent a cost to the taxpayer as well as ratepayers, as the Department must provide data and reports to local government to enable them to carry out the review; and
* it was consistent with seeking a more stable sector.

Four submitters (primarily other entity and local government) considered that reviews should be at the council’s discretion, with three of those submitters noting this could be subject to an appeal mechanism.[[34]](#footnote-35) These submitters considered the three year requirement was too restrictive. One submitter was in favour of a seven year review period.

### Other comments

Two submitters considered there should be less time between reviews, but did not specify a timeframe.

Six societies and one other entity considered that there should not be local policies, and matters such as machine numbers should be in the Gambling Act. The societies had various reasons:

* local government policies were the reason behind the significant reduction in class 4 gambling expenditure;
* that local authorities were inconsistent; and
* working with multiple local authorities was difficult.

How have local class 4 venue policies impacted on both problem gambling and sustainability of grant funding?

Submitters across all stakeholders commented on this question. Responses are summarised thematically below.

### No impact on problem gambling or impact unclear

Twenty-nine submitters (predominately societies and venues) considered there was no evidence that local authority policies had reduced problem gambling rates.[[35]](#footnote-36) The venues referred in particular to the sinking lid policy not having an impact. A number of submitters referred to Ministry of Health statistics of problem gambling rates in their submissions.

Four local authorities believed there was insufficient evidence of a positive impact in a recent review. Auckland Council noted that problem gambling rates in Auckland were rising, but suggested the rates could possibly have risen higher if there was no sinking lid policy.

### Positive impact on problem gambling

Some submitters considered that sinking lid policies would reduce problem gambling, but this impact would take some time. One gambling help and health provider submitted that the “no relocation” policy in Auckland had resulted in more diversity in how communities are entertained. This was considered to have a positive impact on problem gambling.

Two submitters considered that it was useful to have local authorities examine the social impact of class 4 gambling. A gambling help and health provider considered that the council discussions and debates over their venue policies would raise community awareness of the harm from class 4 gambling.

### Negative impact on community grants

Thirty-three submitters (predominately societies and venues) considered that the sinking lid policies and reduced venues had reduced grants funding to community organisations.[[36]](#footnote-37)

### Difficult to measure impact on community grants

Two submitters considered it was difficult to measure the impact of local policies on grant funding without better information.

### Impact on community grants a necessary outcome

Some submitters considered a reduction in community funding was a necessary outcome of reduced spending on class 4 gambling. One gambling help and health provider noted that some community groups were making the decision not to apply for community grants from class 4 gambling proceeds. Another gambling help and health provider considered that little was given back to the community compared to the amount spent on class 4 gambling. It considered that funding often went to the local authority or to a sporting entity controlled by a venue operator.

# The Department’s regulatory functions and the cost of regulating gambling

The Department has responsibility for regulating the class 4 environment under the Gambling Act. Regulatory activities include:

* Non-club societies have to apply to the Department for a gambling licence each year.
* Monitoring the value of grants funding by non-club societies to community organisations, to check that it reaches the minimum required under regulations.
* Gambling inspectors inspect venues to check they meet the requirements of the Gambling Act, including the venue’s responsibilities around harm minimisation.
* Other regulatory activities include efforts to reduce theft and fraud, minimise harm from gambling and maximise returns to the community.

The cost of regulating the non-club sector is approximately $14 million per annum (GST exclusive). These costs are met by charging fees to gambling operators.

What influence do the Department’s regulatory functions and operational policies have on the sustainability of funding to communities?

Primarily grant recipients, societies and venues answered this question. The majority of these considered that the Department’s regulatory functions and operational policies had a significant negative impact on the sustainability of funding to communities.[[37]](#footnote-38)

Grant recipients, societies and venues considered that the high cost of regulation in the form of increased fees affected the amount of funding available. Submitters stated that costs are driven by inefficient regulatory practices and policies and that a change in regulatory approach is needed to support the sustainability of the sector. The Class 4 Working Party summed up the views of many submitters:

*The current philosophy results in unnecessary regulatory costs and fees… As the infrastructure declines, the fees burden increases as a percentage of total cost impacting on funds available to the community.*

Some submitters, including 15 grant recipients, considered that the Department had a positive influence, as the effect of the regulatory functions is to ensure that the sector is operating in good faith. These submitters also included gambling help providers, individuals, local government and other entities. However some of these submitters considered that the Department should adopt a stronger regulatory approach as there is evidence of poor compliance across the sector.

One submitter considered this question was unhelpful as it set up the regulation of the industry in competition with funding to communities.

Do you think the cost of regulating the C4 sector is reasonable?

Primarily grant recipients, societies and venues answered this question. The majority of these submitters considered that the Department’s costs were higher than they should be and suggested ways of effectively regulating the sector at less cost.[[38]](#footnote-39) A few submitters considered that the cost of the Integrated Gaming Platform has driven fee recent fee increases.[[39]](#footnote-40)

Some submitters considered the cost was reasonable to regulate a harmful product, and to ensure public confidence in the sector.

Are there ways of effectively regulating the sector at less cost?

Submitters across all stakeholders answered this question. Responses are summarised thematically below.

### Less regulation

Submissions from clubs, grant recipients, societies and venues focused largely on the theme of less, or more cost-effective, regulation. Many of these submitters considered that the Department should adopt a high trust, risk-based approach to regulation in collaboration with the sector, to reduce both regulatory and sector costs.[[40]](#footnote-41) The New Zealand Community Trust submitted:

*The Department fails to appreciate that, though they are established as not-for-profits, many societies are large operations with significant financial and other risks and responsibilities outside the Gambling Act framework, and that they have governance expertise that reflects those risks and responsibilities. The Department all too often seeks to intervene in or dictate society operational matters which do not advance the objectives of the Gambling Act, but rather increase compliance costs for no obvious benefits.*

A few societies and venues suggested alternative regulatory approaches such as co-regulation, codes of practice, and accreditation schemes. Many of these submitters noted that the Department’s approach to regulation should be more focused on outcomes rather than on prescriptive policies and procedures.

The Class 4 Working Party captured the views of many submitters as follows:

*The sector believes that many of the current requirements do nothing to enhance probity, transparency or reduce the harm from gambling. There needs to be a focus on reducing processing costs and looking at each intervention as to both its effectiveness and efficiency in achieving an identified objective.*

A few grant recipients suggested removing regulatory practices that produce no appreciable benefits.

### Possible changes to the licensing regime

The class 4 licensing regime was an area of much comment from submitters who considered that the Department should move away from a restrictive and inflexible licensing regime to reduce costs. Examples of unnecessary or outdated requirements identified included:

* the need for licences to move gaming machines in and out of venues;[[41]](#footnote-42)
* the inability to pay licensing fees electronically;
* key person checks when a venue changes society but personnel stay the same;
* the need for applications to be formally signed in the presence of a solicitor; and
* duplication between professional auditors’ processes and the Department’s processes.[[42]](#footnote-43)

### Consistent regulation

Some societies commented that the sector as a whole should not be stringently regulated because of the actions of a few. On the other hand, other societies considered that there was inconsistency in the way the Department regulated large and small societies. These submitters called for the Department to use a consistent approach when regulating societies.

Clubs, grant recipients, societies and venues suggested a number of changes to Department policies and to the Act and associated regulations to reduce costs. These suggestions included:

* loosen the licensing requirements around venues and machines;
* allow gaming machine profit (GMP) data, currently collected by the Electronic Monitoring System (EMS), to be reported directly to the Department through the use of existing venue management software;[[43]](#footnote-44)
* remove machine serial numbers from venue licences;[[44]](#footnote-45)
* reduce the number of societies;
* reduce Departmental inefficiencies;
* allow licensing fees to be paid electronically;
* use gaming machine duty to fund regulatory costs;
* accept the efficacy of external independent service professionals;
* align regulations with Queensland, which operates a similar platform to New
Zealand;
* consider overseas models of effective and cost-efficient regulation;
* licence compliant societies every three years; and
* expand the Gambling Commission’s powers to make binding rulings (similar to Inland Revenue Department’s binding ruling system) to reduce appeal costs.[[45]](#footnote-46)

### Other comments

A few submitters considered that more regulation was needed to reduce illegal behaviour and problem gambling, and to ensure better funding to community organisations. Some submitters considered that regulatory costs could be reduced in the following ways:

* significantly reduce the number of societies;
* eliminate competition for venues;
* add transparency and accountability to society and management company operations; and
* add public appointees to society governance boards.

Hospitality New Zealand National queried whether the gaming levy of 20 per cent was going to the consolidated fund rather than being used to fund the Department’s regulatory functions.

What areas should the regulator focus on to reduce unwanted and illegal behaviour and problem gambling rates?

Submitters across all stakeholders answered this question. The majority of submitters were supportive of initiatives to reduce problem gambling rates. Some submitters suggested the following measures:

* introducing pre-commitment technology;
* regular venue inspections and stings without forewarning;
* toughening up on enforcement and prosecutions;
* introducing host responsibility KPIs as part of any selection criteria for societies to operate in any area;
* introducing the New Zealand Appendix to the Gaming Machine National Standard; and,
* providing for gambling help providers to sit on society governance boards.

To reduce unwanted and illegal behaviour in the sector, some submitters suggested:

* introducing barriers to new entrants to the sector, specifically small single purpose societies;
* requiring greater transparency of societies;
* enforce the requirement that the main purpose of a venue cannot be gaming; and
* minimising the capacity for grants capture through greater scrutiny of the relationship between societies, venues and recipients.

Are there more efficient methods of recovering costs from the class 4 sector than the current machine-number based model?

Submitters across all stakeholders answered this question. Submitters suggested possible alternative methods of recovering costs from the sector, including:

* basing fees on a percentage of turnover;[[46]](#footnote-47)
* basing fees on gaming machine profit (GMP);
* charging a flat fee to enter gambling areas and using some of the revenue gathered to cover costs;
* charging a fixed rate per venue operator to ensure that costs are paid from areas of highest gambling activity; or
* forecasting annual costs as a percentage of gambling revenue.

Two submitters supported the current model.[[47]](#footnote-48) A number of societies noted that the size of the sector is the key to an affordable fees regime. They noted that as the sector grows smaller, it becomes harder to spread regulatory costs, especially if costs are fixed.

# Problem gambling

This section provided submitters with an opportunity to discuss the current state of problem gambling in New Zealand, and if current measures to prevent and minimise gambling harm are working.

What is your experience of any changes in harmful gambling behaviour over time?

Submitters across all stakeholders responded to this question. A number of submitters answered this question by referring to various statistical measures of problem gambling. Eighteen submitters considered there was little or no change in the rate of pathological gambling.[[48]](#footnote-49) Many of these submitters referred to Ministry of Health problem gambling data.

### Limitations of statistics

Submitters were concerned that available statistics on problem gambling cannot provide a true picture of the actual levels of problem gambling. Six submitters (primarily gambling help and health providers) noted that statistics of people seeking help for problem gambling is unreliable as many people with problems do not present to support services.

One gambling help and health provider submitted that changes to data collection by the Ministry of Health make trend analysis difficult. One individual considered that the change in harmful gambling behaviour is subjective. One society submitted this was a simplistic question which cannot be answered.

### Submitters’ personal observations

Eleven individuals shared personal stories of how problem gambling had affected them, either because they or a family member are a problem gambler. The results of problem gambling for these individuals included relationship breakdown, job loss, criminal charges and convictions, and a long rehabilitation period. One individual summed this up as follows:

Having lived with a family member who has a gambling addiction for the last four years, [it’s] like being dragged to hell and back time after time.

Other individuals also shared their concerns about problem gambling. For example, one individual considered that harm caused by problem gambling was not recognised by the community and territorial authorities and is grossly underestimated. Another individual submitted that people became obsessive about gaming machines and would gamble more when under stress.

Organisations also shared their observations from interacting with problem gamblers. Two submitters were concerned that their clients cannot meet their financial responsibilities. One local government body considered that money is spent by those who can least afford it. A gambling help and health provider submitted they see numerous cases of young people who have found gambling to be extremely addictive. Another gambling help and health provider submitted that harm from gambling is not restricted to people with a gambling disorder, and approximately 40 per cent of people they screen are experiencing gambling harm.

In comparison, one society noted that as problem gambling is an addiction, some harm is unavoidable, as with other addictions. Another society submitted that feedback from the sector suggests aspects of harm are overstated and driven by speculation rather than fact. A further society was disappointed by the constant negativity towards class 4 gambling.

Several grant recipients noted they had an ethical struggle in considering whether to accept funding from class 4 gambling, because of their awareness of problem gambling.

What is your view on the class 4 sector’s approach to problem gambling?

Submitters across all stakeholders commented on this question. Responses are summarised thematically below.

### Class 4 sector is working well

Thirty-four submitters (primarily grant recipients and societies) considered the approach was generally working well, that venues were increasingly aware of their responsibilities and took them seriously.[[49]](#footnote-50)

Hospitality New Zealand National submitted:

Venues take problem gambling and harm minimisation seriously and offer a controlled and supervised environment. New Zealand spends more per capita on problem gambling treatment and harm prevention than any other country and is looked at as an example in our approach to this issue.

Submitters noted that host responsibility initiatives (such as staff education and the Gamble Host Pack) and strict monitoring and control of venues have had a positive impact. Three submitters stated that New Zealand’s programmes were considered to be world leading.

### Class 4 sector is not working well

Some submitters considered that the current approach could be improved and that while some venues were effective, others were not. Seventeen submitters believed that venues were not meeting their host responsibilities and that the mystery shopper exercise carried out in 2014 provided an accurate picture of host responsibility.

Submitters were concerned about the following in relation to host responsibility:

* it is seen as an imposition on staff time or a business cost;
* that staff were not skilled, were reluctant, or did not have time to intervene with concerning gambling behaviour;
* it can be difficult to assess problem gambling; and
* venues are more motivated to make money and provide community grants than prevent and minimise problem gambling.

Some submitters were concerned about how attitudes were shaping host responsibility behaviours. These submitters considered there was an attitude that gamblers needed to take responsibility for their own problem, instead of recognising that gambling products can be harmful.

Do you have suggestions for how problem gambling could be reduced or better managed?

Submitters across all stakeholders responded to this question. Responses are summarised thematically below.

### Host responsibility requirements

One local government submitter suggested that host responsibility requirements be increased, in line with requirements for liquor licensing. Two other submitters considered that further mechanisms were required to assist with problem gambling. A gambling help and health provider suggested a values-based model, such as a tikanga model, be implemented as the current system does not work.

One society submitted that class 4 operators should be given credit for the measures in place already and enhance those measures rather than bring in new requirements. Another society suggested this review provided an opportunity to link a sustainable class 4 sector with incentives to improve harm minimisation. One other entity submitted aligning incentives, training, regulation, and enforcement to promote harm minimisation. Some submitters considered that adopting a commission-based venue payment system would allow more money to be invested into harm minimisation.[[50]](#footnote-51)

One society noted it supported sensible initiatives to reduce harm. Another three societies submitted the industry has spent significant money on measures that have not reduced problem gambling, but have inconvenienced all players. Some examples given were limiting machine numbers, prize limits, Player Information Display Systems (PIDS), and limiting notes to $20. Another society considered that mandatory limits on all gamblers could be expensive and problematic, and may not help problem gamblers.

### Cash or time spent

Some submissions focused on how much cash or time is spent in a gambling session. These submitters (primarily gambling help and health providers) believed there is a need for limiting the amount of cash or time gamblers are able to spend in one session. For example, submitters suggested:

* limiting the amount of cash withdrawn from the bar;
* limiting the amount of cash spent in one visit;
* requiring gamblers to adhere to a pre-commitment on how much is spent, and stopping the use of a gaming machine for 48 hours at any venue when this limit has been met;
* mandatory intervention with gamblers beyond three hours’ play time; or
* prohibiting cash machines within a venue.

### Venue exclusions

Submitters were divided on the usefulness of exclusions. A small number of submitters supported self-exclusion and believed it was an effective way to prevent and minimise gambling harm. However, several other submitters believed that self-exclusion did not have an effect on problem gambling rates. For example, one individual, who had suffered gambling harm, noted that after a period away, staff failed to check for excluded people. Submitters suggested that there should be a system for friends and family to exclude a problem gambler.

Making venue exclusions effective for problem gamblers and manageable for venues was a major focus for submitters. Fourteen submitters (primarily clubs and societies) supported an electronic multi-venue exclusion order (MVEO) system.[[51]](#footnote-52) This would modernise the process, which was described by some submitters as a “nightmare” to manage. Another six societies submitted there should be a centralised database. Some of those submitters noted this would be useful to manage MVEOs.

Six societies suggested that people should be able to apply for self-exclusion orders by email or online. They considered there might be greater use if the problem gambler could apply without having the stigma of approaching the venue or the potentially unnecessary step of seeing a counsellor.

### Venue rating

Eleven submitters (all clubs and societies) supported a venue rating scheme to lift harm minimisation performance.[[52]](#footnote-53) Venues with excellent harm minimisation practices could have, for example, longer licence length, more machines (usually 25 or 30 machines were suggested), and higher maximum jackpot prizes.

### Penalties

Four submitters suggested strong penalties for breaches, stating that meaningful consequences are needed to ensure host responsibility. Three submitters considered that harm minimisation should be linked to a license requirement or inspection. One other entity submitted that if venues do not follow harm minimisation procedures they should lose their licence indefinitely.

In contrast, one society considered that increased requirements and penalties are unhelpful in dealing the complex issue of problem gambling. This submitter considered that problem gambling in New Zealand was low by international standards and a higher prevalence among Māori and Pacific peoples did not justify a heavy-handed approach.

Another society considered that the collaborative approach to harm minimisation has worked well. However, societies’ trust in this collaborative approach has been undermined by the mystery shopper operation.

### Use of proven technology

A number of societies supported the use of proven technology, but did not want to spend money if the technology was not proven to prevent and minimise gambling harm.[[53]](#footnote-54) Submitters also wanted to target problem gambling, rather than impact on the entertainment of all players.

### Tracking and monitoring technology

Seven submitters suggested investigating using facial recognition technology. Some of these submitters were disappointed that the Department was critical of a trial of this technology.

### Technology that limits play

Five submitters considered that pre-commitment technology was a priority (one gambling help and health provider, one individual, two other entities, one society). In contrast, one society considered that pre-commitment technology was not the future.

### Other specific technology

Twelve submitters (clubs and societies) suggested using the problem gambling levy to pilot or introduce GPS based smart phone apps.[[54]](#footnote-55) While submitters did not provide details of what the app could do, it may assist with exclusion orders. One club considered this could mean less red tape and a more proactive approach to harm minimisation.

### Education of public

Four submitters wanted public education about the harm of gambling and how it easy it is to become addicted. An individual submitted that the signs in venues should be standardised, big enough to read, carry a warning and not be branded with the venue’s or society’s logo. Two gambling help and health providers considered that the voluntary signs in venues that explain host responsibility obligations should be mandatory.

One society submitted that education should de-stigmatise problem gambling, to encourage problem gamblers to seek help. One individual considered that the advertisements and posters appear to blame the problem gambler for being weak-willed, and should be changed. One other entity wanted warning stickers on each gaming machine, similar to the warnings on tobacco products.

Submitters also wanted targeted education for:

* young people aged 18-25, about the risks of gambling and where they could get help, as they were often targeted in the media and were vulnerable (one gambling help and health provider);
* Asian-language speakers, in the form of Asian-language posters at venues about how to get help for gambling (one individual, one other entity);
* financial literacy education in the school curriculum (one other entity); and
* being safe online (one gambling help and health provider).

### Education of venues and their staff

Twelve submitters (primarily societies and gambling help and health providers) supported better training for staff, with some supporting a centralised and standardised training programme. Submitters considered it would be useful for a consistent approach across the country, and would enable staff to move between jobs and have the same training.

Other submitters made specific comments about the training, such as to educate venues on the harms of gambling, to understand the risks and their role in harm minimisation. Some of these submitters also believed that training should be more frequent, as venues can have a high turnover.

### Problem gambling help services

While most submitters focused on how class 4 operators can prevent and minimise gambling harm, some submitters also discussed the role of problem gambling help services. Four gambling help and health providers made submissions about gambling help services:

* there should be a national Māori provider response, as Māori are most impacted negatively by class 4 gambling;
* all providers should be assessed to see what they currently offer and their long-term plans;
* people in some rural areas do not have access to services;
* as assessment should be made of whether there are support groups throughout New Zealand for problem gamblers and others affected by gambling; and
* the addiction workforce should be strengthened through training, recruitment and retention.

### Problem gambling levy

Some submitters believed the levy should be increased for gambling help services. These submitters were concerned that organisations were under-resourced and struggling with the numbers. A gambling help and health provider questioned whether there was enough funding to cope with demand.

Three individuals made separate suggestions for funding problem gambling services:

* the government levy should be reduced to 20 per cent and the extra 3 per cent put into the problem gambling levy. This submitter felt this would reduce the conflict of interest faced by the government;
* increasing the tax and GST on class 4 gambling to help charities; and
* where a club or venue does not comply with harm minimisation requirements, it should pay a penalty to contribute to problem gambling services.

One venue submitted that the problem gambling levy should only be spent on problem gamblers. One society considered that the problem gambling levy had not achieved much apart from the treatment for problem gamblers. One other entity supported the funding for problem gambling services from the sector and did not consider there should be major changes. Another society suggested that resources should focus on improving problem gambling management and support to venue operators.

### Research and knowledge sharing

Two submitters supported research that would monitor the total cost of problem gambling to society. One gambling help and health provider wanted increased research on online gambling addictions. An individual considered research was needed on people with cognitive disability and gambling problems, as venues have limited expertise in keeping them safe.

One society considered the current research was too macro in its definition and analysis. The submitter proposed there should be an in-depth study in an environment outside political or regulator influence, for example, using the “Dunedin Study”. Another submitter suggested the root causes of problem gambling need investigating.

In contrast, one society wanted less funding on academic reports and more funding on practical technology tools to minimise harm. Another submitter suggested there be a trial of player tracking software.

### Online gambling

One gambling help and health provider submitted that multi-venue exclusions should also cover online gambling. Another gambling help and health provider was concerned about the risks of online gambling for youth, the need to educate and provide clear warnings, and the need to ensure only people over 18 years old use the sites. One society was also concerned about online gambling attracting people with gambling problems.

# Non-club class 4 gambling sector

The number of class 4 societies has decreased since the introduction of the Gambling Act.

Is there an optimum number of non-club societies?

### Too many non-club societies

Thirty-three submitters (mostly among gambling help and health providers, individuals and local government) stated that they believed there are currently too many non-club societies.[[55]](#footnote-56) These submitters stated that the high number of societies increases the cost of regulation, and that the duplication of overhead costs across multiple societies reduces the proportion of class 4 revenue available to communities. Submitters further stated that reducing the overall number of societies could potentially increase the overall efficiency of the sector.

### No limits on the number of new non-club societies

In comparison, 25 submitters (mainly grant recipients, societies and venues) stated that there should be no limits placed upon the number of new gaming societies. Submitters stated that the size of the sector was decreasing, not increasing, and that the “bar to entry” was already very high. These submitters also stated that the key aim for the sector is to maximise returns for communities, and that if the sector were to become too small then that would inevitably mean less funding for communities.

### Other considerations on the optimum number of non-club societies:

Some grant recipient submitters considered they were unable to comment on the optimum number of non-club societies, but submitted:

* they were concerned about any changes that would risk reduced funding (17 submitters);
* there should not be a geographic-based system of funds distribution (18 submitters);
* the focus should be not on the numbers, but on the quality of the societies and venues (two submitters).

What criteria do you think should be considered to determine the optimum number of non-club societies?

Most submitters believed the current criteria for granting a class 4 operator’s licence set out in section 52 of the Act were sufficient for determining the number of societies.[[56]](#footnote-57) Several submitters considered that the criteria should be stringent, with a high threshold for entry.[[57]](#footnote-58)

# Non-club venues and their relationship with non-club societies

The number of non-club venues has decreased since the introduction of the Gambling Act. For example, in June 2005, there were 1,801 non-club venues in the sector, there are now 961. Submitters provided a range of responses relating to the relationship between venues and societies, and the inevitable competition that arises between societies.

Do you think the relationship between venues and societies can create problems?

One of the primary themes of this section related to the rules that the Gambling Act provides regarding the relationship between societies and venues. Submitters (primarily societies) stated that the Act clearly establishes rules governing these relationships and that non-compliant behaviour should be dealt with using the framework set out in the Act.[[58]](#footnote-59)

However, some submitters were concerned about potential conflicts of interest. A number of submitters (across all relevant stakeholders) also discussed the inevitable competition that arises between societies as a result of trying to attract new venues. Submitters were fairly evenly split in stating whether this competition was positive or negative.

Is competition for venues between societies desirable?

Those who believed competition between societies was positive stated that competition can only be healthy if societies are adhering to the Act. If all societies are on “level playing fields,” and are adhering to the Act, submitters (especially venues) stated that competition can reinforce healthy behaviours by encouraging best practice amongst societies.

Submitters who stated competition between societies was undesirable said that it was one of the major drivers of inappropriate, and in some cases illegal, behaviour. The majority of these submitters stated that the current arrangement indirectly places too much power in the hands of venues, as societies compete for high-turnover venues. This was seen to enable venues to have significant influence on societies’ grants practices and funding decisions.

Are there alternative approaches to the venue/society relationship that may reduce problems?

The most popular suggestion for alternative approaches to venue and society relationships came from venues. These submitters believed better contractual arrangements, including better terms and conditions for existing contracts, would benefit venues who believe a society is not offering the best efforts to support their business.

In comparison, societies believed it would more beneficial to allow societies to operate their own venues. These submitters believed that gaming venues operated by societies would remove conflict issues with venue operators and could enable a greater focus on harm minimisation while maximising funding for communities.

Some grant recipients suggested a venue’s ability to change societies should be reduced. Other grant recipients were concerned that new societies were focused on special interest groups, to the detriment of other applicants.

One submitter suggested having regional societies operate the venues within their region. Which societies operated would be based on a good track record and host responsibility practices.

What changes in the commercial environment for venues may have implications for their ability to host class 4 gaming machines?

Submitters reflected on various changes to the commercial venue environment in recent times, and how these have impacted on their business models. Submitters stated that banning smoking in pubs and lower drink-drive limits had reduced profits in many smaller and rural venues. As a result of these changes, many rely on class 4 gambling revenue to remain viable. Most submitters saw this as a negative, and not the intention of the Gambling Act.

# Clubs

A primary theme that arrived from this section was that both clubs and non-club venues are facing struggles in the current commercial environment.

Should clubs be supported to remain sustainable?

### Competition between clubs and non-club societies

Societies and non-club venues discussed what they perceived as an unfair differentiation in the treatment of clubs.[[59]](#footnote-60) They submitted that clubs enjoyed unfair advantages in an increasingly difficult commercial environment. Clubs are able to keep a much larger percentage of their gaming revenue for internal purposes, for example. They stated that this negatively impacts the amount of funding being returned to local communities, and furthers an unnecessary level of competition between clubs and non-club societies and venues.

Societies and non-club venue submitters also stated that while clubs are facing declining membership, they should not be permitted to utilise gambling revenue to remain viable. They stated that this reliance has created an incentive for clubs to maximise their gambling revenue which could inhibit their ability to ensure they are making concerted efforts to prevent and minimise gambling harm.

### Clubs support of Clubs New Zealand’s submission

The majority of clubs wrote in favour of Clubs New Zealand’s submission which stated that gaming machines provide a key source of revenue for clubs throughout the country. According to Clubs New Zealand’s submission, these clubs have taken concerted efforts to minimise the harm from gaming machines (for example, developing the online Club Care Programme which focuses on gambling harm prevention and minimisation), while continually looking for ways to invest in their local communities.

As demographics continue to change in New Zealand, club membership is declining and clubs are closing throughout the country. According to clubs, gaming machine revenue provides a much needed level of financial support for clubs to stay viable, while also continuing to provide social and financial benefits for communities.

### Should clubs be supported to remain sustainable?

Submitters were evenly divided regarding whether clubs should be supported to remain sustainable. Those who agreed (mainly clubs) stated that clubs should be allowed to utilise gaming machine revenue to market and promote themselves and their gaming offerings. Further to that, these submitters argued that clubs provide a more “positive environment” than commercial venues for those wanting to participate in class 4 gaming and that they play major roles in their communities. As such, they should be allowed to better market and promote themselves. One submitter considered that clubs should be able to retain all gambling proceeds, rather than distributing to the community.

In comparison, submitters who disagreed (predominately non-club societies and venues) stated that clubs are already self-sustaining through utilisation of member fees and the proceeds of their non-gaming related operations. These submitters stated that if a club’s offerings are unappealing to consumers, then the club would need to adapt its offerings to better suit their market.

### Other

One submitter suggested that clubs should not become explicit gambling-focused venues, but should continue to provide wider social benefits.

# Class 4 funding – minimum rate of return

Is a minimum rate of return the best way to maximise funds to the community?

Seventy-seven submitters (mainly grant recipients, non-club societies and venues) stated that the minimum rate of return is not the best means to maximise funds for communities.[[60]](#footnote-61) The primary reason given was the effect of the 40 per cent threshold on smaller, rural venues. These submitters believed that the minimum rate of return has actually undermined the sustainability of the sector, and had been the cause of the closure of several smaller venues, resulting in fewer gaming machines, and ultimately less community funding.

The 58 submitters who favoured the minimum rate of return (primarily gambling help and health providers, grant recipients and local government) stated that it provides a guaranteed return to communities and is transparent. Twenty-one of the grant recipients in support also suggested any increase in the rate of return should be carefully considered to avoid reducing funds from culling low value venues.

Alternatively, some submitters recommended that the current minimum rate of return should be increased, as they believed it would increase the amount of funding being returned to communities. It would also reduce the number of societies operating, without the need for government intervention.

Can you suggest alternatives to a minimum rate of return to maximise community returns?

Submitters who believed that the minimum rate of return was not the best method for maximising funds to communities provided a range of possible alternative approaches. Some of these were:

* Restricting societies’ operating costs.[[61]](#footnote-62)
* Reducing regulatory compliance costs.
* Dropping the minimum rate of return, or having a realistic rate of return.
* Having a floating or tiered rate of return for low-revenue venues.
* Balancing the minimum rate of return with community needs and demographics to enable venues to continue to provide funding for their local communities.

# Class 4 funding – Grants process

What is your experience of the grants process?

Eighty-two respondents (mostly grant recipients and non-club societies) indicated that they were happy with the current grants process. According to these submitters, the grants process is robust, flexible, and responsive. Also, given the number and diversity of societies with a range of authorised purposes spread throughout New Zealand, accessibility to grants (especially for many smaller community groups) is relatively straightforward.

A smaller portion of submitters (across all stakeholders) stated that while the grants process is intended to be straightforward, grants processes tend to vary between societies. As such, the process can cause confusion and difficulties for applicants (especially those with little or no experience of the grants application process).[[62]](#footnote-63) These submitters called for a transparent and standardised approach to be implemented across all societies. Nineteen grant recipients were concerned that the grants process was time consuming and required too much administration. Examples included repeatedly providing the same documents or obtaining multiple quotes for proposed expenditure.

Do you think the grants process is accessible for everyone?

Seventy-three submitters (including 52 grant recipients) indicated that they believe the current grants process is accessible to everyone.[[63]](#footnote-64) Some submitters also considered that most applications have fast turnaround times. However, some of these submitters also pointed out that the process can be daunting for smaller organisations that lack the institutional knowledge regarding individual societies’ grants processes. As a result, these submitters believed that smaller organisations are potentially missing out on funding opportunities.

The submitters who didn’t think that the grants process was accessible to everyone gave reasons, for example, that smaller communities and areas of high deprivation lack the skills required to complete the application process.

How efficient do you think the process is?

Sixty-one submitters (including 42 grant recipients) commented on the efficiency of the grants process, with the majority indicating that they believed it was efficient.[[64]](#footnote-65) The small number of submitters who disagreed cited a high degree of variance between funders, and duplication and repetition of processes which creates high, inefficient costs.

How fair and transparent do you think the process is?

Fifty-one submitters (grant recipients and societies) stated they believe the current grants process is fair and transparent.[[65]](#footnote-66) Further to that, these submitters believed the introduction of grants reporting changes would further strengthen this. Sixteen submitters (including nine grant recipients) stated that they did not believe the process was fair and transparent, and that many societies lacked transparency in their funding decisions.

Thirty-one submitters (across all stakeholders) stated that the current process needs to improve transparency and ensure fair processes in grants allocation. These submitters suggested there was a need for clearer guidelines and criteria from the societies to grant recipients for what types of expenditure funds can be spent on.

Submitters (including nine grant recipients) considered that public notices regarding funding decisions, reporting distribution, and the amount of available funding should be better communicated to communities. Grant recipients also wanted useful feedback from societies when their applications were declined, rather than a simple “no”.

Do you have any suggestions for changes that would benefit the community’s ability to gain grants funding?

Submitters across all stakeholders, and particularly grant recipients, provided suggestions which they believed would benefit communities’ ability to access grants funding. A number of the submitters believed there is a need for a consistent, nationwide approach to grants funding, providing application advice, and reporting. These submitters believed that a consistent approach to grants funding would enable communities and other possible recipients a more straightforward approach, which would ease some of the burden associated with the application process.

### Maintaining aspects of the status quo

Four grant recipients suggested making no changes to the current process.

Some submitters wanted to keep aspects of the status quo, including:

* Maintaining the local delivery of funding. A centralised funding system could remove flexibility and responsiveness to local needs (40 submitters, mostly grant recipients).
* Maintaining the current transparency and ease of the application process (three grant recipients).
* Continuing to allow paper-based application processes for those who do not have computer access (one grant recipient).
* Continuing to fund sports (one grant recipient).
* Continuing to fund the local community, rather than large projects (Hospitality New Zealand National).

### Suggestions to improves the grants process

Specifically in relation to the grants process, submitters suggested:

* Societies should be encouraged to utilise an online grants application system or online database (including 10 grant recipients).
* Make aspects of the grants process clearer, such as being more user friendly, or making it clear an applicant need not have an existing relationship with a society.
* Societies should work collaboratively to ensure the spread of funding across different areas and community needs.
* Make funding decisions monthly to ensure a good flow of money.
* Allow joint applications from sports clubs and schools.
* Allow grant recipients to apply for funds on behalf of individuals.
* Venues should be able to offer guidance on the grants process to applicants, but would not be decision makers (Hospitality New Zealand National).

Some submitters considered there should be a regionally-based model, or fewer societies.

### Suggestions for how grants should be able to be used

Ten grant recipients wanted to encourage societies to make multi-year grants, or grants over longer periods, to encourage financial certainty for applicants and allow time for large capital expenditure. Seventeen submitters considered that societies should be encouraged to fund operational expenditure, rather than focusing on capital expenditure. Another submitter considered that societies should fund capital expenditure, as groups should fund their own operational expenditure.

Another submitter considered that societies should recognise that projects that benefit a wide community may be contributing to preventing and minimising gambling harm, even if they are not directly related to harm minimisation.

Other submitters focused on the particular types of community projects that could be funded:

* Focus on funding either community sports over regional or national sports; or focus on funding education and health rather than sports; or distribute funds more evenly across different sectors.
* Be able to use grants for international expenditure, for example, musicians.
* Have a greater focus on environmental projects.

Another submitter considered that societies should fund for innovation, which means accepting some projects will “fail”.

### Other changes to the class 4 sector that would assist the grants process

Some submitters also suggested other changes to the class 4 sector, which they considered would assist in the grants process:

* Societies and trusts should be allowed to market and promote themselves, similar to that of Lotto. This would increase knowledge of the grants process (including 23 grant recipients).[[66]](#footnote-67)
* Stopping the decline in gaming machine numbers by preserving the current number, and possibly increasing this amount over time.
* Grant decisions should not sit with societies. There should be a separation of the ownership and operation of gaming machines and the distribution of grants.
* Clubs should be required to provide funding to the community, instead of solely to their own purposes.

# Class 4 funding – Distribution of grants funding

What are your views on the current legislative settings around societies’ authorised purposes?

Submitters across all stakeholders provided their views on the current legislative settings around societies’ authorised purposes. The most dominant theme related to “special purpose” societies. Fifty submitters (across all stakeholders, particularly grant recipients) believed that the current settings enable societies to set up trusts which return funds to narrow specific purposes.[[67]](#footnote-68) For example, one grant recipient noted that a lot of societies focus on youth, families and sport and tend not to focus on people living with HIV, drug use, poverty, homelessness or the effects of homophobia.

Twenty-five submitters specifically mentioned gaming machine proceeds being used for the racing industry[[68]](#footnote-69) and some questioned how this could be considered a charitable cause (as defined in the Charities Act). Some submitters stated that the authorised purpose should be inclusive and grants funds accessible to all sections of a community, while also aiming to prevent and treat problem gambling.

In comparison, 18 submitters (mostly grant recipients, societies and venues) stated that they had no issues with the current legislative settings around authorised purposes.

One submitter considered it could be difficult to match their costs to authorised purposes, for example, deposits are subtracted from the cost. Another grant recipient submitted that there was little objective definition around “religious activity” and their applications were often declined on that basis.

Do you think funding from class 4 gambling is achieving the maximum impact for communities?

Submitters across all stakeholders were divided when asked if class 4 gambling revenue was achieving the maximum impact for New Zealand communities.

Thirty-three submitters (grant recipients, societies and venues) believed that funding from class 4 gambling was achieving the maximum impact for communities. They emphasised the impact that this funding has for community groups and organisations of all sizes, and how gaming machine revenue provides access to funds that would otherwise be unavailable.[[69]](#footnote-70)

Twenty-five submitters (across all stakeholders) stated that they did not believe class 4 gambling is achieving the maximum benefit for communities. They were concerned that the narrow focus of some societies limited distribution opportunities, or considered that the administration was excessive. Also, some submitters questioned funding for certain community activities (e.g. amateur sport) and whether they can, or should, be defined as charitable causes.

Seven grant recipients were reluctant to answer the question, as they considered it required comparing the relative benefits of different groups. Five submitters considered there was a positive impact, rather than a maximum impact.

Grant recipients comprised 551 submitters and almost every submission from grants recipients contained a testimony to the value of the grants to their community projects and programmes. Many submissions referred to specific items bought, outcomes achieved, or the number of people in their community who benefit from the grants. The community assistance ranged from sporting opportunities, education, health and arts to social support. The submitters were concerned about any changes to the class 4 gambling system that might reduce the funding to communities.

What could change for funding to achieve the maximum impact for the community?

Submitters provided a range of suggestions to achieve the maximum impact for the community. Some of these were:

* Enabling community representation in the funding decision making process to ensure funds are being utilised to better meet community needs.
* Funding should be better invested in the prevention and treatment of gambling harm (especially within low socio-economic areas).
* Reduce the size of the class 4 sector over time, and develop “more ethical” funding streams.
* Restructuring the class 4 sector to allow for multi-year strategic grants.
* Align funding decisions with the outcomes sought by national bodies, regional bodies or local authorities.
* Measure the impact of the grants to different community groups to decide which are most effective.
* Consider a process to enable large projects to be funded by multiple organisations.

Should societies return funds to the communities where they are generated?

Submitters across all stakeholder, and particularly grant recipients, responded to this question. The majority of these submitters who were not grant recipients supported funds being returned to the communities in which they are raised.[[70]](#footnote-71) A major theme throughout the responses was the impact that gambling has on lower socio-economic areas, which tend to have greater numbers of gaming machines. As these areas tend to be the worst affected by the negative aspects of gambling harm and addiction, submitters believed it was vital for gaming machine funds raised in those areas to be returned to the communities to support those affected.

Most grant recipients (and some societies) provided a balanced response. Most of them considered there was benefit in some proportion of funds being returned to the communities in which they are raised. However, they also submitted:

* Some areas have more venues than applications, for example, in central city locations; while other areas have more potential applications than venues, for example, in rural areas (17 submitters).
* Funding of national bodies that provide local programmes can benefit communities indirectly and this funding should continue (13 submitters).
* Trusts should not be able to distribute funds obtained from a venue to provide sole benefit to a completely different community.
* Smaller venues could distribute locally while larger venues could distribute to regional or national bodies.

Some societies agreed that funds should be returned to the areas that they are raised, but highlighted that there are barriers at times which inhibit them from doing so. They submitted that societies often do not receive sufficient applications from certain areas, which means they would be unable to distribute the majority of funding in these communities if it was a requirement. These submitters suggested that societies should be required to distribute funds to regions (rather than by area).

One submitter suggested greater funding be provided to the Christchurch area, in recognition of its greater needs following the earthquakes.

Overall, do you think the distribution of funding is equitable?

Forty-five submitters, including 20 grant recipients, believed the distribution of grants funding was uneven and not equitable. They were concerned that:

* In areas of high deprivation, gaming machine funding is not being adequately returned to these areas. As such, those who are most impacted by the harms of gambling are not seeing the positive returns that they should be.
* Narrow funding criteria mean a select few are getting more funding than others.
* Sports are getting more funding than other grant recipients.
* National bodies should be funded, as they provide benefits at the community level.

A portion of these submitters believed there needed to be better monitoring of the distribution of gaming machine funds to ensure they are being utilised for charitable, community-based causes. There was also a call for greater community representation in the funding decision-making process to ensure community needs are being addressed.

Twenty-two submitters thought the distribution of funding was equitable.

A further four submitters stated that this was a subjective matter, and as such, opinions would differ based on individual perspectives and prejudices.[[71]](#footnote-72) Several grant recipients defended the high funding of sport, noting its health benefits, and participation rates.

# Online gambling

In this section, submitters were asked to share their views and opinions on various aspects of online gambling and its future in New Zealand.

Do you think the current policy settings for online gambling are fit-for-purpose?

Submitters across all stakeholders responded to this question. The majority indicated that the current policy settings for online gambling are not fit-for-purpose.[[72]](#footnote-73) These submitters primarily discussed the negative effects that unregulated offshore betting is having on the class 4 sector (primarily the loss of funding being returned to communities) and the potential for increased gambling harm.[[73]](#footnote-74)

From the perspective of increased gambling harm via online outlets, submitters commented on the lack of safeguards in place to ensure that potential harm is being prevented or minimised.[[74]](#footnote-75) Submitters noted that the current legislation does not include any provision for identification processes for online gambling, which increases the potential for under-age people and problem gamblers accessing these outlets. According to these submitters, the current unmonitored nature of online gambling (that is, unregulated offshore betting) is in conflict with the purpose of the Gambling Act, which is intended to control the growth of gambling and prevent and minimise harm, while providing funding for communities.

Five submitters (primarily clubs and societies) stated that class 4 operators should have the ability to offer online gambling options.[[75]](#footnote-76) These submitters cited the growing number of New Zealanders utilising offshore betting services as another hindrance to the sustainability of the class 4 sector. According to these submitters, providing class 4 operators with the ability to provide online gambling options would ensure the sector is fit for future purposes while also improving the financial returns to communities.

If not, how do we need to change the policy settings?

Thirty-one submitters provided suggestions for potential changes to policy settings for online gambling. The primary theme was ensuring that if online gambling is allowed that assurances are made that funds are returned to communities.[[76]](#footnote-77) Submitters expressed concerns about how unregulated offshore gambling (for example, online casinos) is providing zero returns for New Zealand and that if the country is to allow domestic online gambling that it should follow the community model currently operating in the class 4 sector.

Six societies called for changing the policy settings to enable class 4 operators the ability to provide online gambling. They suggested this as a response to the growing amount of New Zealanders accessing offshore betting sites, and how (according to the submitters) if the class 4 sector wants to remain viable it will need to provide similar options.

Other potential policy changes were:

* Regulating access to offshore gambling sites.
* Raising awareness of the potential harm of online gambling.
* Introducing a new, separate class of gambling for “remote interactive gambling.”
* Prohibiting all forms of online gambling.

Do you think other forms of gambling should be available online in New Zealand?

Thirty-one submitters didn’t believe there should be any further forms of gambling made available online. The primary reasoning had to do with the potential harm that accessing gambling outside of regulated venues could have for New Zealanders. As such, several of these submitters stated that the government needs to retain the status quo and not change the current legislation regarding online gambling.

Thirteen submitters (mainly grant recipients, other entities and societies) supported the idea of allowing class 4 operators the ability to provide online gaming options. Most of these submitters highlighted the fact that certain forms of gambling are already available online (for example Lotto and TAB), and that in order for the class 4 sector to remain viable into the future it must be able to offer similar options. According to these submitters, this would also generate further community funding into the future. Another submitter supported allowing other forms of online gaming as long as the proceeds are distributed for community benefit.

Do you think class 3 gambling operators should be able to offer online lotteries?

Twenty-eight submitters responded to this question. The majority of submitters believed class 3 operators should be able to offer online lotteries, as long as they are strongly regulated with capped maximum prizes.

# Further issues/ideas

Are there issues or questions not set out in this discussion paper that you think need to be considered in this review?

Forty-two submitters provided a range of further issues and questions. These were:

* Sustainable funding from class 4 gaming machines is contrary to one of the primary goals of the Gambling Act 2003, that is, to prevent and minimise gambling harm.
* Gaming machines should be removed from local communities (clubs, pubs, etc.) and only be allowed in casino settings.
* Societies should be disestablished in favour of one, national body that can distribute gambling profits throughout the country (similar to the Lottery Grants Board).
* The Government should ensure funding levels do not drop below current levels through an annual appropriation.
* Alternative funding measures should be introduced if the proceeds from class 4 gambling continue to decline.
* The Department of Internal Affairs should produce various data, including an annual report on funds (with demographics of who recipients are and who have missed out), raw data of recipients and regional data of recipients.
* The funding from the class 4 sector may be encouraging an increase in registered charities, with New Zealand having more charities per capita than other countries.
* Societies should consider investing funds to achieve greater returns to communities.
* A greater percentage of the proceeds of gambling in casinos and TABs should be provided to the community.

In relation to the discussion document:

* It is concerning that the discussion document characterises the decrease of expenditure on class 4 gambling as a negative trend that must be mitigated.
* The discussion document does not mention the Government’s obligations under the Treaty of Waitangi, which one submitter considered unacceptable because of the disproportionality of gambling-related harm for Māori.
* It does not acknowledge the Government itself benefits from gambling proceeds and has a vested interest in the sector.
* Class 4 gambling should be reviewed alongside other forms of gambling that return a lower percentage to the community.
1. List of submitters

Total number of submitters: 747

|  |  |
| --- | --- |
| Clubs (21) |  |
| Club BullerClub Mount MaunganuiClub SouthlandClub WaimeaClubs New ZealandHamilton Workingmen's ClubsHavelock North ClubHenderson RSAHokitika Chartered ClubHowick ClubInvercargill Workingmens Club Inc. | Johnsonville ClubNgunguru Sports and Recreation SocietyOhakune Club IncOpotiki County RSAOtaki RSASouth Otago Town and Country ClubThe Franklin Club Inc Tongariro Chartered ClubWaihi Memorial RSAWooleston Club |
| Gambling help and health providers (19) |  |
| Budget Advisory Service (Whakatane)Canterbury District Health BoardCentre 401 TrustDowntown Community MinistryHapai Te HauoraHealth Action TrustNew Zealand Nurses OrganisationNga Tai O Te AwaOtara Gambling Alcohol Action GroupProblem Gambling Foundation | Southern DHBStrategic Health SolutionsTe Ara Tika TrustTe Whangai TrustThe Salvation ArmyTime 2 Change ServicesWaikato DHBWoodlands Centre Charitable TrustYouthline Auckland |
| Grant recipients (551) |  |
| Adult Literacy Rural TrustAIMS Games TrustAkarana Golf ClubAkaroa Golf ClubAktive Auckland Sport and RecreationAlbion Cricket ClubAqua Health InvercargillArohanui HospiceArthritis New ZealandAscot Park Racecourse ConsortiumAshburton Golf ClubAsia New Zealand FoundationAthletics Invercargill ClubAthletics Manawatu WanganuiAthletics NelsonAthletics NZAthletics SouthlandAthletics TaurangaAthletics WanganuiAthletics WellingtonAuckland Arts FestivalAuckland BowlsAuckland Chamber OrchestraAuckland Children's Christmas Parade TrustAuckland CricketAuckland GolfAuckland Philharmonic OrchestraAuckland Rugby UnionAuckland Theatre CompanyAuckland University Rugby ClubAutism NZAwarua Whanau ServicesBadminton EastlandBasketball New ZealandBasketball OtagoBay of Plenty District Rugby LeagueBay of Plenty Golf ClubBay Oval TrustBeckenham Bowling ClubBelfast Community NetworkBirthright NZBlenheim Bowling ClubBlenheim Rowing ClubCentral Rugby LeagueChamber Music NZChild Cancer FoundationChristchurch Bowling ClubChristchurch Metropolitan Cricket ClubChristchurch Netball CentreChristchurch School of GymnasticsChristchurch South Community WatchChristchurch Symphony OrchestraCitizens Advice Bureau InvercargillCitizens Advice Bureau NZCity of Invercargill Highland Pipe BandClarks Beach Golf ClubClassic Boat Club of SouthlandCoastguard New ZealandCoca Cola Christmas in the ParkCoeliac New ZealandCollegiate Rugby Football ClubCollegiate Swimming ClubCommunity Networks WellingtonConductive Education Southern CentreCornwall Districts Cricket and Sports AssociationCoromandel Golf ClubCounties Manukau Basketball AssociationCourt TheatreCreative Capital Arts TrustCricket WellingtonCromwell Bowling ClubCycling SouthlandDanceArtsDannevirke Sports ClubDiabetes NZ Southland BranchDiamond Harbour and Bays Bowling ClubDisabilities Resource Centre SouthlandDunedin NetballDynamic Rhythmic GymnasticsEastern Bay of Plenty Rugby Sub UnionHalberg Disability Sport FoundationHamilton Cricket AssociationHamilton Group Riding for the DisabledHanmer Springs Gold ClubHarewood Golf ClubHastings Golf ClubHatea Harriers WhangareiHavelock North Bowling ClubHawera United Cricket ClubHawkes Bay Hockey AssociationHawkes Bay Rugby UnionHead Injury Society of SouthlandHearing Association SouthlandHearing HouseHearing SouthlandHeartland Otago Southland Life Education TrustHibiscus HospiceHikurangi Golf ClubHillary OutdoorsHockey NZHockey OtagoHockey SouthlandHockey Turf Charitable TrustHokonui Bowling ClubHororata Golf ClubHorowhenua A P & I AssociationHorowhenua Events Centre TrustHorowhenua Kapiti Rugby Football UnionHorsham Downs Golf ClubHospice North ShoreHospice SouthlandHospice TaranakiHowick Bowling ClubHowick Golf ClubHunua Bowling ClubInvercargill Contract Bridge ClubInvercargill Elim Community Church TrustLiteFootLiving SpringsMahunga Golf ClubMahurangi River Restoration TrustMakarewa Netball ClubMana Amateur Athletic ClubManawatu GolfManawatu Rugby UnionManawatu StridersManor Park Golf ClubMaramarua Golf ClubMarching Hawkes BayMarist St Pats Rugby Football ClubMarsden Yacht and Boat ClubMarton Golf ClubMaungarei Community Christian TrustMercury Bay Golf and Country ClubMornington Bowling ClubMorrison Avenue Bowling ClubMount Manganui Golf ClubMt Wellington Swimming ClubMulti-Sport OpotikiMurihiku Swimming ClubMuriwai Golf ClubMurupara Golf ClubMuscular Dystrophy NorthernNapier Bridge ClubNapier Golf ClubNapier Harrier ClubNational Equestrian CentreNelson Golf ClubNelson Netball CentreNetball MainlandNetball Northern ZoneNetball South ZoneNew Plymouth Golf ClubNew Plymouth Old Boys Rugby ClubOriental Rongotai Football ClubOtago CricketOtago Medical Research FoundationOtago Rugby Football UnionOtago Secondary Schools Sports AssociationOtahuhu Rugby Football ClubOtaki Golf ClubOtaki Surf Life Saving ClubOtatara Bowling ClubOtatara Landcare GroupOtumoetai Golf ClubOxford Sports TrustPakuranga UnitedPalmerston North Golf ClubPanthers Softball ClubParafed New ZealandParafed OtagoParafed WaikatoParent to Parent NZ Parkinsons NZParklands Bowling ClubPauatahanui Golf ClubPelorus Netball ClubPhoenix Synchro SouthlandPicton Bowling ClubPicton Golf ClubPirates Old Boys Rugby ClubPlay It Strange TrustPleasant Point Yacht ClubPockets 8 Ball ClubPonsonby Rugby Football ClubPoverty Bay Hockey AssociationPoverty Bay Rugby Football UnionPregnancy Help OrganisationPresbyterian Support SouthlandProbus Club Invercargill CentralProject LytteltonSouthland Art SocietySouthland Asthma SocietySouthland Badminton AssociationSouthland Master Badminton ClubSouthland Basketball AssociationSouthland Beneficiaries and Community Rights CentreSouthland Billiards & Snooker AssociationSouthland Boxing Association Inc.Southland Canoe ClubSouthland Chamber of CommerceSouthland Christmas Parade Charitable Trust and Southland Group NZ Riding for the DisabledSouthland Community HouseSouthland Cricket AssociationSouthland Eagles Golfing SocietySouthland Filipino SocietySouthland Fire Service Museum Society Inc.Southland Foodbank Charitable TrustSouthland FootballSouthland Girls High SchoolSouthland Golf ClubSouthland Greyhound Adoption TrustSouthland HelpSouthland Indoor BowlsSouthland Land Rover ClubSouthland Masters Badminton ClubSouthland Mature Employment Services LimitedSouthland Motorcycle ClubSouthland Mountain Bike ClubSouthland Multicultural CouncilSouthland Multiple Sclerosis SocietySouthland Piping and DrummingSouthland Power Boat ClubSouthland Racing ClubSouthland Rowing AssociationSouthland Science FairSouthland Secondary School SportSt Patricks InvercargillSt Vincent De PaulStar Rugby Club InvercargillStrings of Southland TrusteeSumner Cricket ClubSurf Life Saving New ZealandSwim for Life Tairawhiti TrustSwimming Canterbury West CoastSwimming SouthlandSwimming WaikatoSydenham Cricket ClubTable Tennis SouthlandTahuna Golf ClubTaieri Golf ClubTainui Bowling ClubTakitimu Anglican Care TrustTalent Development Southland Charitable TrustTamaki BudgetingTapanui GolfTaranaki GolfTaranaki Rugby Football UnionTasman GolfTasman Rugby UnionTaupo Golf ClubTawa Rugby Football ClubTaylors Mistake Surf Life Saving ClubTe Ngutu Golf ClubTe Puke Amateur Athletics ClubTe Rapa SchoolTe Teko Golf ClubTennis CanterburyTennis CentralThames Bowling ClubTimaru Golf ClubTimaru Wood Turners ClubTitahi Bay Golf ClubTOA Fighting Systems SouthlandWanganui Football ClubWaverley Golf ClubWaverley Park SchoolWellington GolfWellington HockeyWellington RugbyWellsford Golf and Squash ClubWesley Harrier and Athletic ClubWest End (Timaru) Bowling ClubWest Melton Bowling CubWestbrook School Rotorua | All Saints Badminton ClubAlzheimers Society Eastern Bay of PlentyAlzheimers Society TaupoAmberley Golf ClubAndersons Bay Bowling ClubAorangi South Canterbury Golf ClubBlue Oyster Arts TrustBlues Indoor Bowling ClubBluff Bowling ClubBluff Hill Bowling ClubBluff Oyster and Food Festival Charitable TrustBluff Rugby Football ClubBluff SchoolBody Positive Boulcotts Farm Heritage Golf ClubBowls DunedinBowls Far NorthBowls HornbyBowls Kapiti CoastBowls Kapiti Coast UmpiresBowls NapierBowls New ZealandBowls NorthlandBowls OrewaBowls SouthlandBowls WaitaraBrighton Bowling Club DunedinBrowns Bay Bowling ClubBurnside Bowling ClubBurwood AcademyBush Haven Native Bird Rehabilitation TrustBush Rugby ClubC S Art Charitable TrustCancer SocietyCanterbury Cricket AssociationCanterbury Golf ClubCanterbury HockeyCanterbury Rugby Football UnionCapital FootballCarlton Cornwall BowlsCentral FootballCentral Otago BowlsCentral Otago Living OptionsEastland Triathlon and Multisports ClubElmwood Bowling ClubEnrich @ Invercargill Licensing TrustEnrich PlusEpilepsy New ZealandEverglades Country Golf ClubFairlie Bowling ClubFC Twenty 11 Inc.Feilding Golf ClubFeilding Old Boys Oroua Rugby Football ClubFendalton Bowling ClubFiordland Athletics ClubFirst Church Heritage Buildings Charitable TrustFirst FoundationFitzroy Golf ClubFootball SouthFoveaux Harmony ChorusFreyburg Rugby ClubFunding NZ LtdFundraising Institute of New ZealandGeorgetown Indoor Bowls ClubGillies McIndoe Research InstituteGisborne Bowling ClubGisborne GymnasticsGisborne Thistle AFCGolf OtagoGolf SouthlandGolf Te PukeGraeme Dingle FoundationGraeme Dingle Foundation SouthlandGrammar Juniors Rugby Football ClubGrasmere Indoor Bowling ClubGreenacres Country ClubGreendale Golf ClubGymnastica Gym ClubGymsports New ZealandH20 DreamsInvercargill Freemasons Hall CompanyInvercargill Garrison Band SocietyInvercargill Golf ClubInvercargill Harness Racing ClubInvercargill Indoor Bowls Sub-CentreInvercargill Netball CentreInvercargill Parents of Gifted ChildrenInvercargill Rowing ClubInvercargill Secondary Schools Network TrustInvercargill YMCAIsland Child Charitable Trust NZIsland Park Golf ClubJohn McGlashan CollegeJohnsonville Cricket ClubJubilee Budget Advisory ServiceKaiapoi Riverside Bowling ClubKaikoura Bowling ClubKaikoura Golf ClubKaipatiki Community Facilities TrustKaipupu Point Sounds Wildlife SanctuaryKaitaia and District Kindergarten AssociationKaitangata Golf ClubKamo Bowling ClubKensington ClubKirwee Bowling ClubLakeview Golf and Country ClubLeith Harrier and Athletic ClubLevin Budget ServiceLife Education Trust Coastal OtagoLife Education Trust Kapiti HorowhenuaLife Education Trust North ShoreLife Education Trust North WellingtonLife Education Trust NZLife Education Trust SouthlandLife Education Trust Waikato EastLincoln Golf ClubNew Plymouth Yacht ClubNew Zealand ChefsNew Zealand CricketNew Zealand FestivalNew Zealand Football New Zealand GolfNew Zealand NetballNew Zealand OperaNew Zealand Paramedic Education and Research Charitable TrustNew Zealand RugbyNew Zealand Rugby LeagueNew Zealand Spinal TrustNew Zealand Sports Hall of FameNew Zealand Swim Coaches and Teachers AssociationNgaruawahia Golf ClubNgongotaha Leagues ClubNorth East Valley Bowling ClubNorth Harbour Basketball AssociationNorth Harbour Bays Athletic ClubNorth Harbour Golf AssociationNorth Harbour Softball AssociationNorthcote Tennis ClubNorthern Bowling Club (Manawatu)Northern Districts Cricket AssociationNorthern Football FederationNorthland Cricket AssociationOhope International Golf ClubOkaihau Golf ClubOlympia Gymnastic SportsOmaha Beach Golf ClubOmakau Bowling ClubOmanu Golf ClubOmaui Tracks TrustOmokoroa Bowling ClubOpotiki Primary SchoolOpunake Surf Life Saving ClubOreti Park SpeedwayPukekohe Golf ClubPutaruru Bowling ClubQueens Park Association Football ClubQueens Park Croquet Club Inc.Queens Park Golf ClubQueens Park Ladies Golf ClubRangiora Bowling ClubRangiora Harness Racing ClubRiccarton Leagues ClubRiccarton Racecourse Bowling ClubRolleston Mens Shed Charitable TrustRonald McDonald House CharitiesRotorua Golf ClubRotorua Stockcar ClubRowing New ZealandRoxburgh Golf ClubRoyal New Zealand BalletRoyal New Zealand Pipe Bands AssociationRoyal New Zealand Pipe Bands Southland CentreRoyal New Zealand Yacht SquadronRugby League Development FoundationRugby SouthlandScargill Golf ClubScience Alive Charitable TrustSelwyn CollegeSeniorNet SouthShakespeare Globe Centre NZShakespeare in the ParkSMOG Netball ClubSnow Sports NZSoftball NZSouth Canterbury District Cricket AssociationSouth City Community ChoirSouthern Institute of TechnologySouthern Sou’ NZ Mens Harmony ChorusSouthern United Hockey Club Inc.Southland ACC Advocacy TrustSouthland Society of Model EngineersSouthland Sports Car ClubSouthland Tennis AssociationSouthland Tramping ClubSouthland Water PoloSouthland Wood Workers GuildSouthland Workers' Educational AssociationSouthland Youth One Stop ShopSPCA AucklandSPCA CanterburySpecial Olympics NZSpirit of Adventure TrustSplash Palace (Southland Aquatic Centre)Sport AucklandSport Bay of PlentySport CanterburySport GisborneSport Hawke's BaySport ManawatuSport NorthlandSport OtagoSport SouthlandSport TaranakiSport TasmanSport WaikatoSport WellingtonSport WhanganuiSpreydon School ChristchurchSquash AucklandSquash NZSquash SouthlandSquash Southland IncorporatedSt Albans Cricket ClubSt Clair Golf Club DunedinSt John South Island RegionSt John's Girls' SchoolSt Kilda Bowling ClubToastmasters ClubTouch New ZealandTouch SouthlandTriathlon Hawkes BayTrident High SchoolTrue Colours Children's Health TrustTrust Waikato Onemana Surf Life Saving ClubUniversity of Auckland FoundationVenture SouthlandVictory Boxing NelsonVolleyball Hawke's BayVolleyball New ZealandVolleyball SouthlandWaahi Taakaro Golf ClubWaihi Golf ClubWaihopai Bowling ClubWaihopai SchoolWaikanae Golf ClubWaikare Golf ClubWaikato Bay of Plenty FootballWaikato Golf AssociationWaikato Institute for Leisure and Sport StudiesWaikato Rugby UnionWaikite Valley SchoolWaikiwi Bowling ClubWaikiwi Rugby Football ClubWaikouaiti Golf Club Waimate Golf ClubWaipa King Country Life Education TrustWaitangi Bowling ClubWaitara Golf ClubWaitemata Rugby and Football Sports ClubWakatipu Rowing ClubWanaka Gold ClubWanaka Golf ClubWanaka Primary SchoolWanganui East Bowling ClubWestern Suburbs Football Club Westport Golf ClubWhakatane Squash ClubWhangamata Surf Life Saving ClubWhangarei Men's ShedWindsor North SchoolWinton Croquet ClubYachting New ZealandYoung Enterprise TrustYouth Development Southland Regional TrustYWCA Christchurch |
| Individuals (56) |
| Fifty-six individuals provided submissions. A significant number of the individuals had experienced gambling harm themselves or in relation to a family member or friend. We have not published their names to ensure their privacy, but thank them for sharing their personal stories. |
| Local Government (9) |  |
| Auckland CouncilChristchurch City CouncilHastings District CouncilHutt City CouncilLocal Government New Zealand | Masterton District CouncilNapier City CouncilRangitikei District CouncilWaimakariri District Council |
| Other (29) |  |
| Action Group Advance Gaming NZ LtdAotearoa Community Development AssociationAristocratAuckland District Council of Social ServicesBrandadvantageBudget Advisory Service (Whakatane)Church in Progress Metropolitan Community Church Community Benefits LtdCommunity Trust of SouthlandConsolidated Gaming SolutionsCreative New ZealandSkycity CasinoSocialLink | Downtown Community MinistryGaming Technologies AssociationGenerosity New Zealand Harkness Henry Lawyers Heart FoundationKorean Community Wellness SocietyMaxservNew Zealand Media EntertainmentNew Zealand Recreation AssociationNZ360Philanthropy New ZealandRyan Thomas and Co Chartered AccountantsSae Woom Tor Charitable TrustSparkWellington Methodist Church |
| Societies (29) |  |
| Air Rescue and Community ServicesAkarana Community TrustBirkenhead Licensing TrustBlueSky Community TrustClass 4 Working Party GroupChristchurch Earthquake Recovery TrustConstellation Communities TrustDragon Community TrustFirst Light Community FoundationFirst Sovereign Trust LimitedFour Winds IndustryGrassroots TrustInfinity FoundationILT FoundationLion Foundation | Mainland FoundationMt Wellington FoundationNew Zealand Community TrustNew Zealand Racing BoardNorth and South Community TrustPelorus TrustPub CharitySouthern TrustSouthern Victorian Charitable TrustTrillion TrustTrust AorakiTrust House FoundationTrusts Community Foundation LtdYouthtown Inc. |
| Venues (33) |  |
| Ashburton Licensing TrustBirkenhead Licensing TrustBJs TavernBrook Bar and EateryDuke of Gloucester Bar and RestaurantFarriers ArmsGrand Hotel AkaroaGrand Hotel WhangareiGolden Gate LodgeHospitality New Zealand Auckland and Counties ManukauHospitality New Zealand CanterburyHospitality New Zealand GisborneHospitality New Zealand Hawkes BayMuddy FarmerNorthend Hotels LtdOpawa Bowl and Jack and Stockxchange City Taverns ChristchurchPost Office Hotel Pahiatua | Hospitality New Zealand NationalHospitality New Zealand NelsonHospitality New Zealand NorthlandHospitality New Zealand OtagoHospitality New Zealand Palmerston NorthHospitality New Zealand South Canterbury Hospitality New Zealand Thames BranchHospitality New Zealand WellingtonHospitality NZ BullerHospitality NZ MarlboroughHospitality NZ TaranakiJohn RoyMangatera HotelMethven Pubs LtdNew Zealand Licensing Trusts AssociationRenners BarTrinity GroupTrout Hotel |

1. CAB-15-MIN—0074 refers. [↑](#footnote-ref-2)
2. Department of Internal Affairs, *Discussion Document: Review of Class 4 Gambling* (June 2016) [↑](#footnote-ref-3)
3. Other entities include not for profit organisations, churches and various businesses associated with class 4 operators. [↑](#footnote-ref-4)
4. In this document, the term “class 4 sector” means the entire system of class 4 gambling, regulations, and the various organisations involved in the class 4 sector, including class 4 operators, gambling help and health providers, grant recipients and local government. [↑](#footnote-ref-5)
5. In this document, the term “class 4 operators” means clubs, societies and venues. [↑](#footnote-ref-6)
6. Including Clubs New Zealand, Class 4 Working Party Group, Hospitality New Zealand National. [↑](#footnote-ref-7)
7. Including Clubs New Zealand. [↑](#footnote-ref-8)
8. Including Hospitality New Zealand National. [↑](#footnote-ref-9)
9. Including Hospitality New Zealand National, Class 4 Working Party Group. [↑](#footnote-ref-10)
10. Including Hospitality New Zealand National, Class 4 Working Party Group. [↑](#footnote-ref-11)
11. Including Hospitality New Zealand National. [↑](#footnote-ref-12)
12. At the time the discussion document was released. [↑](#footnote-ref-13)
13. Including Hospitality New Zealand National. [↑](#footnote-ref-14)
14. Including Hospitality New Zealand National. [↑](#footnote-ref-15)
15. Including Hospitality New Zealand National. [↑](#footnote-ref-16)
16. Including Clubs New Zealand, Class 4 Working Party Group. [↑](#footnote-ref-17)
17. Including Clubs New Zealand. [↑](#footnote-ref-18)
18. Including Clubs New Zealand. [↑](#footnote-ref-19)
19. Including Clubs New Zealand. [↑](#footnote-ref-20)
20. Including Clubs New Zealand. [↑](#footnote-ref-21)
21. Including Clubs New Zealand. [↑](#footnote-ref-22)
22. Including Clubs New Zealand. [↑](#footnote-ref-23)
23. Including Class 4 Working Party Group. [↑](#footnote-ref-24)
24. Including Hospitality New Zealand National. [↑](#footnote-ref-25)
25. Including Class 4 Working Party Group. [↑](#footnote-ref-26)
26. Including Hospitality New Zealand National, Class 4 Working Party Group. [↑](#footnote-ref-27)
27. Including Clubs New Zealand. [↑](#footnote-ref-28)
28. Including Clubs New Zealand. [↑](#footnote-ref-29)
29. Including Class 4 Working Party Group. [↑](#footnote-ref-30)
30. Including Class 4 Working Party Group. [↑](#footnote-ref-31)
31. Including Clubs New Zealand. [↑](#footnote-ref-32)
32. Including Clubs New Zealand, Class 4 Working Party Group. [↑](#footnote-ref-33)
33. Including the Class 4 Working Party Group. [↑](#footnote-ref-34)
34. Including Class 4 Working Party Group. [↑](#footnote-ref-35)
35. Including Class 4 Working Party Group. [↑](#footnote-ref-36)
36. Including Class 4 Working Party Group. [↑](#footnote-ref-37)
37. Including Hospitality New Zealand National. [↑](#footnote-ref-38)
38. Including Class 4 Working Party Group. [↑](#footnote-ref-39)
39. Including Class 4 Working Party Group. [↑](#footnote-ref-40)
40. Including Hospitality New Zealand National, Class 4 Working Party Group. [↑](#footnote-ref-41)
41. Including Hospitality New Zealand National. [↑](#footnote-ref-42)
42. Including Hospitality New Zealand National, Class 4 Working Party Group. [↑](#footnote-ref-43)
43. Including Clubs New Zealand. [↑](#footnote-ref-44)
44. Including Clubs New Zealand. [↑](#footnote-ref-45)
45. Including Clubs New Zealand, Class 4 Working Party Group. [↑](#footnote-ref-46)
46. Including Class 4 Working Party Group. [↑](#footnote-ref-47)
47. Including Hospitality New Zealand National. [↑](#footnote-ref-48)
48. Including Class 4 Working Party Group. [↑](#footnote-ref-49)
49. Including Class 4 Working Party Group. [↑](#footnote-ref-50)
50. Including Hospitality New Zealand National. [↑](#footnote-ref-51)
51. Including Clubs New Zealand. [↑](#footnote-ref-52)
52. Including Clubs New Zealand. [↑](#footnote-ref-53)
53. Including Class 4 Working Party Group. [↑](#footnote-ref-54)
54. Including Clubs New Zealand. [↑](#footnote-ref-55)
55. Including The Lion Foundation. [↑](#footnote-ref-56)
56. Including Class 4 Working Party Group. [↑](#footnote-ref-57)
57. Including Hospitality New Zealand National. [↑](#footnote-ref-58)
58. Including Class 4 Working Party Group. [↑](#footnote-ref-59)
59. Including Hospitality New Zealand National. [↑](#footnote-ref-60)
60. Including Clubs New Zealand, Hospitality New Zealand National, Class 4 Working Party Group. [↑](#footnote-ref-61)
61. Including Hospitality New Zealand National. [↑](#footnote-ref-62)
62. Including Hospitality New Zealand National. [↑](#footnote-ref-63)
63. Including Class 4 Working Party Group. [↑](#footnote-ref-64)
64. Including Class 4 Working Party Group. [↑](#footnote-ref-65)
65. Including Class 4 Working Party Group. [↑](#footnote-ref-66)
66. Including Class 4 Working Party Group. [↑](#footnote-ref-67)
67. Including Hospitality New Zealand National. [↑](#footnote-ref-68)
68. Including Hospitality New Zealand National. [↑](#footnote-ref-69)
69. Including Class 4 Working Party Group. [↑](#footnote-ref-70)
70. Including Hospitality New Zealand National. [↑](#footnote-ref-71)
71. Including Class 4 Working Party Group. [↑](#footnote-ref-72)
72. Including Hospitality New Zealand National. [↑](#footnote-ref-73)
73. Including Class 4 Working Party Group. [↑](#footnote-ref-74)
74. Including Class 4 Working Party Group. [↑](#footnote-ref-75)
75. Including Clubs New Zealand. [↑](#footnote-ref-76)
76. Including Hospitality New Zealand National. [↑](#footnote-ref-77)