

**BEFORE THE NEW ZEALAND GAMBLING COMMISSION**

under the Gambling Act 2003

in the matter of an application by SkyCity Queenstown  
Limited for renewal of its Casino Venue Licence

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**AFFIDAVIT OF CARL PHILLIP DAVIDSON**

21 October 2025

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## AFFIDAVIT OF CARL PHILLIP DAVIDSON

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I, **Carl Phillip Davidson** of Christchurch, Social Scientist, solemnly and sincerely affirm —

### Introduction

1. I have worked in the field of social research since 1991 (34 years) including with various consultancies.
2. I hold a Bachelor of Arts in psychology and political science with a First Class Honours.
3. I am currently a director of The Curiosity Company, an insights and strategy consulting company based in Christchurch and Auckland.
4. In addition to my role at The Curiosity Company I am a Senior Adjunct Fellow in the University of Canterbury's Business School.
5. In 2023 I was made a Fellow of the Research Association of New Zealand (RANZ) and also named an Insight250 Winner by ESOMAR, a global membership association for market research and insights that was founded in 1947). The Insight250 is an annual award celebrating the worldwide pioneers, leaders and innovators in market research, data-driven marketing and insights.
6. I led the social impact assessment for the Casino Impact Report for the venue licence renewal application for the Grand Casino in Dunedin.
7. I have extensive experience as a social expert witness in New Zealand, appearing before Select Committee hearings, council planning hearings, and the Environment Court.
8. I confirm that I have read the 'Code of Conduct for Expert Witnesses' contained in Schedule 4 of the High Court Rules 2016 as if references to the court were reference to the Gambling Commission. My evidence has been prepared in compliance with that Code in the same way as I would if giving evidence in the High Court.
9. The issues I address are within my area of expertise, except where I state that I am relying on what I have been told by another person, and I will not omit to consider material facts known to me that might alter or detract from the opinions I express in my evidence.
10. I prepared the social impact assessment component of the Casino Impact Report (**CIR**) for SkyCity Queenstown Limited's application to renew its Casino Venue Licence for the SkyCity Queenstown Casino. I confirm that component of the CIR as part of my evidence before the Commission.
11. I am fully aware that my role in these proceedings is not as an advocate for any particular outcome but to provide evidence that may assist the Commission in its deliberations.

### Scope of Evidence

12. Given that the full CIR is already before the Commission, I do not intend to repeat that material in this affidavit in such detail. With this in mind, my affidavit includes:
- (a) a summary of the process of preparing the social impact assessment in the CIR.
  - (b) an overview of key findings on social impacts in the CIR.
  - (c) my responses to issues raised in submissions; and
  - (d) some concluding comments about the CIR.

### Preparing This Social Impact Assessment

13. Section 134(3) of the Gambling Act 2003 (**Act**) states that a CIR must assess the social and economic effects on the affected local and regional areas, and on New Zealand generally, of:
- (a) the continued operation of the Casino; and
  - (b) the closure of the Casino.
14. Preparing the assessment of social effects (the social impact assessment component) for the CIR occurred over a period of nine months, from January 2023 to October 2023.
15. The assessment design used for this social impact assessment built on the methods used (and the lessons learned) in the creation of the CIR for the Christchurch Casino in 2017 and refined in the CIR for Dunedin's Grand Casino (2022).
16. Completion of the CIR involved a significant process of engagement with relevant stakeholders and the local community, comprising:
- (a) A review of the literature about gambling and problem gambling in Queenstown and the wider Otago region.
  - (b) An analysis of the media and social media relating to gambling in Queenstown and the wider Otago region, with a particular emphasis on the operations of SkyCity Queenstown.
  - (c) Interviews with 22 stakeholders and community representatives across Queenstown and Otago.
  - (d) An in-situ survey of SkyCity Queenstown patrons (N=241).
  - (e) An online survey of SkyCity Queenstown members (N=103).
  - (f) A survey of residential neighbours of SkyCity Queenstown (N=24).
  - (g) A survey of residential businesses who are neighbours of SkyCity Queenstown (N=50)

- (h) A community survey of Queenstown residents (N=206), and
  - (i) A nationwide survey of residents (N=380).
17. Taken together this means we consulted with over 1,000 people across Queenstown, Otago, and New Zealand in preparing this CIR.
18. I have undertaken no further data gathering nor assessment since that time.

### **Key Findings In The CIR On Social Effects**

#### *Beneficial Social Impacts*

19. The most obvious benefit of the SkyCity Queenstown Casino is that it provides a significant entertainment option for residents in Queenstown and Otago, and for visitors to Queenstown. For residents, SkyCity Queenstown contributes to Queenstown's status as a thriving and fun city. For international visitors, SkyCity Queenstown contributes to Queenstown's status as being 'the best place to visit in New Zealand' (as identified by Lonely Planet). Queenstown is New Zealand's second most often visited destination by international travellers (after Auckland) with just over a million international visitors in that year.
20. For residents, the presence of SkyCity Queenstown is part of the suite of entertainment options that make Queenstown a vibrant and fun city. The most recent data on resident sentiment, the *Queenstown Lakes District Council's 2022 Quality of Life Survey Report* shows that 77% of residents rate their overall quality of life as good (47%) or extremely good (30%). When asked to list the top positive impacts associated with tourism in the Queenstown Lakes district, 39% of residents mentioned a range of hospitality bars, cafes, restaurants, and nightlife as primary benefits.
21. In the Queenstown community survey completed for this CIR 55% of residents said they had been to SkyCity Queenstown. These visits split roughly into half saying they gambled while there and one-half who said they did other things while there.
22. In that same community survey, 51% of the respondents said that visiting SkyCity Queenstown had given them 'pleasure and fun'. Queenstown residents were also likely to agree that for most people, a visit to the Casino is a fun night out with family and friends" (66%) and "SkyCity Queenstown Casino is an important part of the city's entertainment offering" (44%).
23. This entertainment benefit also applies to the many domestic and international tourists who visit Queenstown each year. While not seen as a primary driver of visitation, a number of the people interviewed for this CIR note that SkyCity Queenstown Casino plays a role in the mix of attractions on offer in Queenstown. As one stakeholder noted there is "an expectation" that a tourist destination like Queenstown would offer adult entertainment like a casino.
24. This expectation is also reflected in the national survey conducted for this CIR. In that survey we asked residents across New Zealand how acceptable they thought it was that a range of locations offered a range of

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attractions. In that survey respondents were much more likely to find it acceptable that Queenstown has a casino than Dunedin or Hamilton. Note that casinos were the only attraction that showed this dispersion of acceptability scores.

25. Simon Harris will cover the economic benefits of SkyCity Queenstown's operation for Queenstown but in the social impact assessment the value of the Casino's Charitable Trust grants and the Casino's sponsorships was mentioned often.

### **Adverse Social Impacts**

26. The most common adverse social impacts associated with casino operations are gambling harm and crime. These perceptions are then related to a lowered quality of life for residents. In the case of the SkyCity Queenstown Casino there seems to be little of either impact (gambling harm or crime) that can be directly attributed to the operation of the casino.

#### *Gambling Harm*

27. True and Cheer (2023) show that while Queenstown accounts for approximately 0.3% of New Zealand's population but only accounts for 0.2% of new problem gambling cases and 0.17% of all people who seek help for problem gambling. In this regard, Queenstown, despite having a casino, seems to be less likely to have problem gamblers seeking help than other centres in New Zealand.
28. How much of the problem gambling in Queenstown can be attributed to SkyCity Queenstown is uncertain but it may be in the order of just 2 or 3 presentations to problem gambling counselling services. This is because, according to Ministry of Health data the casino sector accounts for approximately 20% of all presentations to problem gambling services. In the year 2020/2021 there were just eight presentations in the Queenstown Laked District area. If the 20% figure for casinos is correct, this means fewer than two people being assisted in Queenstown are attributable to SkyCity Queenstown. If we add in those from Central Otago (three new presentations, five clients in total in 2020/21) this might mean three of the clients in the QLDC area are related to casino gambling.
29. In terms of qualifying criteria, to enter SkyCity Queenstown you must 20 years old or older, and proof of age can be requested. SkyCity Queenstown is clear that it provides a "world-class environment" and requires "a neat and tidy standard of dress at all times". SkyCity Queenstown takes these obligations very seriously and for the year ending June 2023 more than 5500 people were denied entry.
30. SkyCity Queenstown's Host Responsibility Programme is highly regarded by stakeholders. For instance, a representative of the Salvation's Oasis Salvation Army Oasis Centre for Problem Gambling noted that SkyCity Queenstown's host responsibility was "very robust" and that the size of the casino means staff have more visibility of any potential problems.

31. Similarly, the licencing inspector consulted for the CIR highlighted SkyCity Queenstown's regular<sup>1</sup> engagement with stakeholders, its measures to address problem gambling and a possible interplay between tourism and gambling concerns.
32. SkyCity Queenstown also runs its own regular mystery shopping exercises to ensure ongoing compliance with the HRP as well as deploying facial recognition software on its CCTV cameras to monitor for HRP compliance. There are 180 cameras in the Queenstown Casino.
33. While facial recognition cameras are only active in and immediately around the gaming floor and at ATMs, surveillance cameras monitor and record activity both on and in the surrounding areas of the premises. SkyCity is able to retain surveillance and facial recognition footage to supply to SkyCity's regulators and/or government agencies where required and/or permitted by law.
34. SkyCity also monitors repeat withdrawals and multiple declined transactions at certain ATMs located at its premises for indicators of problem gambling which, when triggered, will be linked to facial recognition images taken at those ATMs.
35. The social impact assessment paid particular attention to whether the Casino was causing gambling harm among vulnerable populations, particularly (a) Māori (b) Pasifika, (c) older residents, and (d) international students.
36. For **Māori** there is no doubt that this population is more likely to experience gambling harm than other population groups. But it is unlikely that SkyCity Queenstown is a major contributor to this. Perhaps because Māori are underrepresented in the Queenstown Urban Area, Māori comprised less than 3% of the those in the patron survey completed for this social impact assessment.
37. Staff at SkyCity Queenstown report low levels of at-risk gambling activity by Māori, having excluded just three Māori patrons in the year to June 2023
38. It is a similar story for **Pasifika** in Queenstown. Pacific peoples comprised just 1.2 percent of Queenstown's population at the time of this study and were such infrequent visitors to SkyCity Queenstown.
39. In terms of the Asian community, in 2018, 17.8 percent of the population in the Queenstown Urban Area identified as Asian, matching the share of SkyCity Queenstown patrons by ethnicity (17.5 percent).
40. A representative from the Otago and Southland Chinese Association noted that problem gambling has never been raised as an issue at Association meetings.

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1. Sky City Casino Queenstown holds six-monthly stakeholder meetings to engage with different members of the community. This forum is used to update the community on procedures, problem gambling instances, and measures taken to address them.

41. While customers of SkyCity Queenstown skew older (25 percent of the patrons were over 60 years old compared to 30 percent of the Queenstown population), **older** patrons are much less likely to be excluded from the Casino than other patrons.
42. In the stakeholder interviews a representative from Grey Power Otago was not aware of any systemic issue with problem gambling among the older residents in Otago. This representative said, "to be honest with you, we have not actually found amongst our population that it seems to be a real issue."
43. It is possible that there is gambling harm occurring **among international visitors** to SkyCity Queenstown that is missed elsewhere in this CIR. This is because there is no international sharing of exclusion data. This means SkyCity Queenstown cannot know if an international visitor has been excluded from a casino in their home country. Given the high number of tourists in town there may be problem gamblers amongst those groups – but given their short stay they might be missed in the local understanding of problem gambling.
44. Similarly, it is possible that there may be some gambling harm among young transient workers in Queenstown. The exclusion data shows a slightly higher skew for those aged 20-39. It is possible that if harm is experienced by this group, they would not be captured in the region's harms-related data.
45. When these two potential problems were raised with SkyCity they made the point that while international exclusions could not be enforced locally, their HRP was still active for anyone on-site in SkyCity Queenstown. This means that international visitors and transient workers are subject to the same rules about continuous play, cash withdrawals, and alcohol consumption.

#### *Antisocial Behaviours*

46. As noted above the second most common adverse effect associated with casino operations is crime. As with gambling harm there seems very little crime or anti-social behaviour that can be directly attributed to the operation of SkyCity Queenstown.
47. There are few crimes recorded in neighbourhood of SkyCity Queenstown and local police are clear that very few of these are likely attributable to the Casino's activity. Police were clear that SkyCity Queenstown is seen as a low-risk venue, which does a good job of managing its risks.
48. This is also seen in how few SkyCity Queenstown patrons have been asked to leave the site due to behavioural issues—just three between in the year to June 2023.
49. It is certainly the case that the small number of immediate residential neighbours of SkyCity Queenstown did not report any problems with anti-social behaviour in the neighbourhood

50. Moving the focus a little wider. The Queenstown Visitor Survey (which tracks the views of domestic visitors to Queenstown) shows that visitors to Queenstown have low levels of concerns about antisocial behaviour.
51. Finally, The New Zealand Crime and Victims Survey collects information about New Zealanders' experience of crime. This survey has run every year from 2018 asking a nationally representative sample of 8,000 New Zealanders about their experiences with crime. The latest data from this survey (conducted in June 2022) shows that the Otago region as a whole remains one of the safest places in New Zealand.

#### **Additional Information**

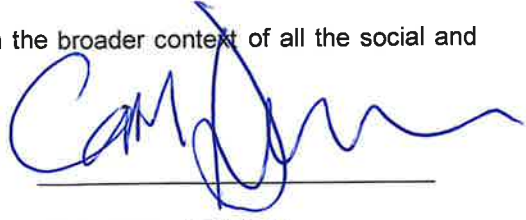
52. I note that since the completion of the CIR carded play has become mandatory in SkyCity Queenstown. This means that to play in the casino customers will need a SHOW card, that verifies their identity and provides an extra level of safeguards for their play. This is because the card enables SkyCity to monitor gameplay patterns and encourage safer gaming behaviours.

#### **Conclusion**

53. My conclusion is that there is little support from a social impact perspective for not renewing SkyCity Queenstown's license.
54. This assessment demonstrates that SkyCity Queenstown Casino confers entertainment benefits to its users, and contributes to Queenstown's status as a tourist town.
55. At the same time, non-renewal would deprive the community of funding for a range of organisations that are also contributing to the wellbeing of Queenstown and the Otago region.
56. There is also the unique nature of Queenstown and the extent to which people expect a destination like Queenstown to have a casino.
57. In contrast to the positive benefits noted above, the most common adverse effects associated with casino operations are gambling harm and crime. The analysis outlined above argues that there is negligible crime directly associated with the operation of SkyCity Queenstown Casino, and hence it cannot be argued that no-renewal will contribute to public safety in Queenstown.
58. As for gambling harm, there is no doubt that gambling-related harm is a real and continuing issue in New Zealand. This social impact assessment has argued that the quantum of gambling harm directly attributable to SkyCity Queenstown is likely to be small. Rather than reducing gambling harm, closing SkyCity Queenstown might increase the potential for harm should those Queenstown and Otago residents who wish to keep gambling shift to more dangerous forms of gambling. This is a particular risk if the casino gamblers migrate to online gambling.
59. I believe the CIR represents a genuine attempt to provide a comprehensive and balanced set of information about social effects, and includes the

evidence on social harm within the broader context of all the social and economic effects.

**AFFIRMED** at Christchurch this day  
of 2025 before me:



Carl Phillip Davidson

29-10-25



A solicitor of the High Court of New Zealand