

23 May 2024

Gambling Commission
PO Box 137295
Parnell
Auckland 1052

By Email: info@gamblingcom.govt.nz

Dear whomever it may concern,

Submission by Christchurch Casinos Limited on the application by Dunedin Casinos Limited for renewal of Casino Venue Licence under section 134 of the Gambling Act 2003

Christchurch Casinos Limited (Christchurch Casino, CCL, we, or us) wishes to put forth a submission to the Gambling Commission (the Commission, or you) in respect of Dunedin Casinos Limited's (the casino, Grand Casino or GC) application for renewal of their Casino Venue Licence for a further 15 years, in accordance with section 134 of the Gambling Act 2003 (the Act).

Our comments on GC's renewal application are as follows, pursuant to s135 (1) (f) of the Act:

Support of application

1. **We support the application** by Grand Casino to renew their Casino Venue Licence for a further 15 years in accordance with s134 of the Act.

Reasons for our support

Economic and Business

2. GC has been operating in Dunedin for the past 25 years and has become a successful business during this time.
3. The casino has a dedicated and skilled team of employees across a wide range of divisions who have ensured that the environment for customers is safe, secure, and compliant, whilst maintaining a high standard of service.

The casino has a Board of Directors in place to oversee all matters from a governance perspective.

4. The casino has boosted economic development in Dunedin and the South Island through:
 - Employment
 - Capital investments and operational expenditure
 - Tourism
 - Community distributions via their Charitable Trust (see below).

Shareholder interest

5. CCL is one of the majority shareholders of GC, with a 33% ownership of the company. Peter Treacy, director of CCL, is also a director of Dunedin Casinos Limited.

Therefore, CCL has a vested interest in the performance of GC, including compliance with all laws and regulations to which it is subject.

Community

6. The company has become a well-established part of the community. Since 1999, they have provided over \$4m in donations through their Charitable Trust.

Working relationship

7. CCL continues to work closely with GC, as well as other casinos in New Zealand in relation to Harm Minimisation, Anti-Money Laundering/Countering Financing of Terrorism (AML/CFT), Compliance, and other operational matters.

Our regulators, the Department of Internal Affairs (DIA), have a current focus on AML/CFT within the casino sector, therefore this collaboration takes on greater significance in the current climate.

Industry representation

8. Alongside CCL, GC continue to represent the casino and gaming industry with attendance at regulatory conferences including the AML Summit, FIU and ACAMS conferences.

Casino operations

9. A key intention of the Act is to prevent and minimise the harm caused by gambling. Casinos provide a safe and responsible gaming environment.
10. Casinos within New Zealand work together to ensure that the prevention and minimisation of gambling harm is a major focus. The casino venue exclusion processes ensure anyone banned from one casino cannot gain entry to another, and casinos work with various treatment providers to assist individuals before they can be considered for re-entry into a casino. A Host Responsibility Programme, which underpins this, is required to be reviewed by the Commission every three years.

11. All casinos are subject to the strict requirements of the Anti-Money Laundering/Countering Financing of Terrorism Act 2009 (AML/CFT Act) which imposes many obligations on casino providers. As noted above, this is heavily scrutinised by the DIA, and therefore should provide comfort to the community that appropriate processes, procedures and controls are in place by all casinos to mitigate the risk of money laundering and terrorism financing.

Attendance at hearing

12. We would like to attend the Public Hearing of the application, when this is scheduled, but *would not* like to be heard at the hearing.

13. Our connection with Grand Casino

As mentioned above, CCL has a 33% shareholding in GC. As one of the majority shareholders of the company, CCL has a significant interest in the performance of GC, which includes its ability to renew its licence.

14. Information we could provide at the hearing to assist the Gambling Commission in making their decision on the application.

CCL is the longest operating casino in New Zealand, and therefore is well placed from a market, operations, and compliance perspective, to provide information to the Commission which could assist them in making their decision. This includes the inner workings and processes of casinos both in New Zealand and across the wider industry, and the risks inherent in their operations.

If you have any queries on the nature or content of this submission, or require any further information, please feel free to contact me on 027 489 9920.

Yours sincerely

Ahmad Khawaja

Manager, Anti-Money Laundering and Compliance
Christchurch Casinos Limited