

# Submission to the Gambling Commission on the renewal of Dunedin Casino's licence Renewal

## INTRODUCTION

1. This submission is made by Te Rangihaeata Oranga, Purapura Whetū, Poutiri Trust, Kō Collective Trust and Hāpai Te Hauora who make up the National Māori Gambling Harm Minimisation Public Health Collective. Our organisations represent new Māori specific preventing and minimising gambling - regional public health services, established by Te Aka Whai Ora and operational as of 1 January 2024.
2. Any correspondence to this submission should be sent to Jessikah Leatham-Vlasic: [jessikha.leatham-vlasic@hapai.co.nz](mailto:jessikha.leatham-vlasic@hapai.co.nz)
3. We **oppose** the application to renew Dunedin Casino's licence on the basis that we do not have enough evidence to assess the impact and effectiveness of the current Dunedin Host Responsibility Programme and other harm minimisation measures on Māori and Tauīwi; and a substantive evidence-base of existing gambling harm inequities experienced by Māori.
4. We welcome the opportunity to attend and be heard at the public hearing of the application.
5. We also request the opportunity to meet with the Gambling Commission.
6. In providing this submission we draw on our knowledge, skills, and experience base as Māori public health and public health practitioners from across all regions in Aotearoa, that have a collective interest in improving health outcomes for whānau Māori and in this instance the prevention and minimisation of gambling-related harm. In preparing this submission, we considered:
  - The application by Dunedin Casinos Ltd for renewal of a Casino Venue licence under section 134 of the Gambling Act 2003;
  - Casino Impact Report (CIR) - An assessment of the social and economic impacts of the Grand Casino Dunedin (December 2022);
  - Host Responsibility Programme;
  - The Casino Control Act 1990; and
  - Current evidence about preventing and minimising gambling-related harm for whānau Māori and Aotearoa New Zealand more broadly.

## EXECUTIVE SUMMARY

7. We note that the Dunedin Host Responsibility Programme (HRP) was approved in August 2019 and that the Gambling Commission agrees to review the programme every 2 years. We refer to page 35 of the Dunedin HRP which outlines a range of data the

- licence operator is expected to collect and report on, annually. See Appendix A for an exhaustive list of the gambling and other related measures outlined in the Dunedin HRP.
8. Given the expectation of the licence operator to collect and report on measures annually, we respectfully request the following from the Gambling Commission:
    - a. An explanation as to what analysis has been undertaken on the impacts of the licence operators' host responsibilities activities since 2019 with particular consideration on the impacts of host responsibility activity on Māori compared with other ethnicities;
    - b. An explanation as to what, if any, bearing or consideration the licence operators' host responsibility activities and performance since August 2019, feature in the Gambling Commission's decision on the current application to renew Dunedin Casino's licence.

## BACKGROUND & CONTEXT

9. The Pae Ora (Healthy Futures) Act (2022) aims to:
  - a. Protect, promote and improve the health of all New Zealanders
  - b. Achieve equity in health outcomes among New Zealand's population groups, including by striving to eliminate health disparities, in particular for Māori; and
  - c. Build towards Pae Ora (healthy futures) for all New Zealanders.
10. Gambling is a recognised public health issue in New Zealand. The Gambling Act 2003 sets our requirements for an integrated problem gambling strategy focused on public health. The regulation of gambling environments, operators and products are part of an evidence-based approach to preventing and minimising harm - as well as being a central tool in addressing inequitable gambling harm outcomes for Māori.
11. Gambling was not a part of Māori culture or life before European colonisation, it was introduced with the European importation of horses and cards, and from there developed exponentially (Adams, 2004). This development has resulted in diverse methods of gambling, including the opportunity for gambling in casinos and the consequent associated harm.
12. The introduction of the Casino Control Act (1990) brought a prospect of employment and economic advancement for Māori communities, but also a prospect of gambling harm. To commemorate the inauguration of these establishments, carvings were meticulously positioned at entry points, kaumātua were also invited to perform cultural and spiritual rituals. These steps were taken to encourage Māori to frequent and contribute to casino and gambling ecosystems. This epitomises the subtle ways in which gambling, and casinos have been weaved into our communities, culture, and society; regardless of if our communities were aware or consented to the use of culture to connect us to casinos (Dyall et al., 2009).
13. We know that Māori communities experience inequitable, negative harms associated with gambling; either as an individual experience or because of someone else's gambling. The prevalence of gambling in Māori communities is three to four times higher than the general population of Aotearoa, exasperating the diverse harms our communities experience. This manifests itself in social, physical, spiritual, and mental harms including financial burdens, relationship breakdown, mental illness, etc. (Abbott et al., 2018).

14. These manifestations do not include the unique harms that the communities we serve endure including, but not limited to, the disruption of whānau values, harm to wairua, mana, and identity, and the experiences of whakamā (Rockloff et al., 2021).
15. The Casino Impact Report (CIR) underscores that nationally, the casino sector constitutes roughly 20 percent of all cases presented to gambling services, acknowledging the casino industry's role in contributing to gambling harm.
16. As highlighted by the CIR, the local economy is projected to experience minimal repercussions from the non-renewal, suggesting a limited dependence on the renewal of Dunedin's Casino licence. While we recognise the potential adverse effects on employees due to non-renewal, it prompts us to consider whether the marginal economic benefits to the community outweigh the detrimental consequences linked to casinos and gambling.

## RECOMMENDATIONS

17. Should the licence to operate be renewed we make the following recommendations:
  - a. The Gambling Commission give significant consideration as to how it will contribute to the purposes of the Pae Ora (Healthy Futures) Act 2022 with specific reference as to how, in its statutory functions, it will achieve equity in health outcomes among New Zealand's population groups, including by striving to eliminate health disparities, in particular for Māori.
  - b. Within the context of the Pae Ora (Healthy Futures) Act 2022, how the Gambling Commission will give effect to Te Tiriti o Waitangi, ensuring that Māori rights, interests, and well-being are upheld and protected throughout the process. This includes meaningful engagement with Māori stakeholders and the incorporation of Māori perspectives into decision-making frameworks regarding Dunedin Casinos, and effective reporting, as specified in section 2.3.
  - c. Inclusion of a specific allocation of sponsorship or grant funding toward culturally sensitive gambling support services targeting Māori individuals and whānau. This could involve partnerships with Māori health organisations to ensure effective outreach and tailored interventions.
18. We welcome the opportunity to participate in, and make the following requests:
  - a. To aid and assist with the monitoring of HRP activity and its impact on Māori, the Gambling Commission provides us with copies of annual monitoring reports and include our organisations in all HRP performance monitoring and formal review activities.
  - b. The Gambling Commission considers wider measures of 'Pae Ora' or wellbeing in future licence and HRP reviews. For example, Mauri Ora, Toi Ora, Wai Ora, Whānau Ora etc, as well as a comprehensive assessment of the social, economic, and health impacts on individuals, families/whānau and communities.

## REFERENCES

Abbott, M., Bellringer, M., and Garrett, N. (2018). New Zealand National Gambling Study: Wave 4. Report number 6. Auckland: Auckland University of Technology, *Gambling and Addictions Research Centre*.

Adams, P. (2004). The history of gambling in New Zealand. *Journal of Gambling Issues*, 12, 1-15.

AUT. (n.d.). The burden of gambling harm in New Zealand: summary of main findings. *Online webpage*.

Dyall, L., Tse, S., & Kingi, A. (2009). Cultural icons and marketing of gambling. *International Journal of Mental Health and Addiction*, 7, 84-96.

Rockloff, M., Bellringer, M., Lowe, G., Armstrong, T., Browne, M., Du Preez, K. P., ... & Greer, N. (2021). *Life course and legacy gambling harms in New Zealand*. Ministry of Health Manatū Hauora.

## APPENDIX A - Monitoring and Reporting - Gambling related measures for Dunedin Host Responsibility Programme (page 35 & 36)

<b>Gambling Related Measures</b>	<b>Source of data</b>	<b>Frequency</b>
• Number of customers about whom there have been observations.	Dunedin Casino	Annual
• Number of indicators reported to Host Responsibility.	Dunedin Casino	Annual
• Number of approaches to Dunedin Casino by third parties.	Dunedin Casino	Annual
• Number of problem gamblers identified (in the first instance) by requests for exclusion or forthright disclosure, compared to number of problem gamblers identified by the Casino.	Dunedin Casino	Annual
• Number of GOI files by: <ul style="list-style-type: none"> <li>• Ethnicity</li> <li>• Gender</li> <li>• Age</li> <li>• Preferred mode of gambling (tables/EGMs).</li> </ul>	Dunedin Casino	Annual
• Number of interventions conducted with customers.	Dunedin Casino	Annual
• Number of approaches to customers to offer information about self-exclusion.	Dunedin Casino	Annual
• Number of Exclusions by: <ul style="list-style-type: none"> <li>• Ethnicity</li> <li>• Gender</li> <li>• Age</li> <li>• Preferred mode of gambling</li> <li>• Prompted by third party disclosures</li> <li>• Exclusion type (self/Dunedin Casino)</li> <li>• Timeframe</li> <li>• Following re-entry.</li> </ul>	Dunedin Casino	Annual
• Number of customers participating in multi venue Exclusions.	Dunedin Casino	Annual
• Number of customers participating in multi casino Exclusions.	Dunedin Casino	Annual
• Number of customers participating in Agreed Limitation programme.	Dunedin Casino	Annual
• Number of Excluded customers agreeing to be contacted by help services on exclusion form.	Dunedin Casino	Annual
• Number of breaches of Exclusion by: <ul style="list-style-type: none"> <li>• Ethnicity</li> <li>• Gender</li> <li>• Age</li> </ul>	Dunedin Casino	Annual
• Number of successful and unsuccessful applications to re-enter following exclusion.	Dunedin Casino	Annual
• The extent to which customers have been assisted (drawing, inter alia, on feedback from customers and staff).	Dunedin Casino	Annual
• Number of persons trespassed or required to leave for making loans for financial gain.	Dunedin Casino	Annual
<b>Measures relating to Responsible Consumption of Alcohol</b>		
• Number of "Under the Influence" (UTI) incidents (internal report).	Dunedin Casino	Annual
• Number of requests for people to leave due to the amount of alcohol consumed.	Dunedin Casino	Annual

<b>Measures relating to Staff Training</b>		
<ul style="list-style-type: none"> <li>• HR1 courses</li> <li>• HR2 courses</li> <li>• HR3 courses</li> <li>• Refresher training</li> <li>• Number of staff who need to be trained in each category, and proportion of those staff that have completed the appropriate level training.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>• Staff recall of Knowledge and Behaviours related to host responsibility and associated policies and procedures.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>• Staff Perceptions on the effectiveness of the Employee Gambling Harm Programme.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>• Results of tests conducted by staff relating to host responsibility and associated policies and procedures.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>• Staff perceptions of the effectiveness of training.</li> </ul>	Dunedin Casino	Annual
<b>Other Programme activity and compliance-related measures</b>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>• Number of internal and external underage incidents.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>• Number of unattended children.</li> </ul>	Dunedin Casino	Annual
<ul style="list-style-type: none"> <li>• Number of people requested to leave the Casino for other reasons</li> </ul>	Dunedin Casino	Annual