

30 May 2024

Gambling Commission
PO Box 137295
Parnell
Auckland 1052

Tēnā koe,

Submission by PGF Services on the Renewal of Casino Venue Licence for Dunedin Casinos Limited

Thank you for the opportunity to provide a submission to the Gambling Commission on Dunedin Casinos Limited's (DCL) application for the renewal of their Casino Venue Licence for a further 15 years.

PGF Services' position on application

1. PGF Services is the only national provider of mainstream services for the prevention and minimisation of gambling harm in Aotearoa New Zealand. We are a charitable trust operating nationally with services delivered under contract to Te Whatu Ora and funded from the gambling levy.
2. We have first-hand experience supporting gamblers and affected others in navigating the impact of gambling harm, including casino gambling, on their lives. PGF Services has supported patrons who have experienced gambling harm from DCL over the years.
3. As an organisation, we are opposed to the harm caused by gambling rather than gambling in its entirety.
4. PGF Services has regularly attended liaison meetings hosted by DCL. We acknowledge DCL for their openness and willingness to support patrons who are experiencing harm. However, we cannot ignore that their gambling products and table games have caused and continue to cause harm to those in the community.
5. Given this, PGF Services does **not** support the application by DCL to renew their Casino Venue Licence.

Reasons for our position

Gambling is a widespread public health issue

6. The Gambling Act 2003 recognises gambling as a public health issue and one of its key purposes is to prevent and minimise harm from gambling.

7. Taking on a public health approach, the Act defines harm in a broad way: “*harm or distress of any kind arising from, or caused or exacerbated by, a person’s gambling*”. Moreover, a problem gambler refers to “*a person whose gambling causes harm or may cause harm*”.
8. The Ministry of Health estimates the number of people experiencing mild, moderate, or severe gambling harm is more than 250,000 people across Aotearoa New Zealand. It is also recognised that “*reports show that only 16% of potential clients for gambling support services actually access or present at these services*”.¹
9. In comparison, the Casino Impact Report (CIR) prepared by DCL purports, “*it may be an estimated 20 presentations to problem gambling counselling services*” as a result of the Casino’s activities.²
10. We are concerned that the CIR has applied a reductive approach to estimate those experiencing gambling harm. Importantly, it reflects a lack of understanding around how harm and problem gamblers are defined according to the Act.
11. PGF Services has provided counselling support to patrons of DCL throughout the years. We have seen the widespread impacts of gambling harm caused by DCL, and it is important to recognise that the harm experienced is not only limited to patrons, but also extends to their whānau, friends, and broader community groups.

Host Responsibility Programme (HRP)

12. We have seen DCL’s commitment to uphold legislative responsibilities under the Gambling Act 2003 and would like to further encourage DCL to improve upon their HRP.
13. The current HRP only focuses on those experiencing severe gambling harm and disregards those experiencing mild and moderate harm. Improved efforts are needed to take on a public health approach to the HRP to better accommodate the broader definition of harm as defined by the Act and prevent and minimise harm across the continuum of gambling harm.
14. We also understand that DCL is working very closely with SkyCity Casino Management Limited in creating a universal Mandatory Carded Play (MCP) system across Aotearoa New Zealand. Currently, it is unclear how cashless systems, such as MCP, will be used and if they can effectively prevent and minimise gambling harm.
15. If the Casino Venue Licence is extended, PGF Services strongly encourages DCL to reflect stronger harm minimisation strategies in their next HRP, such as shorter continuous play periods and longer breaks in play.

Gambling harm experienced by priority population groups

16. Gambling harm disproportionately impacts Māori, Pacific peoples, Asian peoples, and young people/rangatahi. These populations have been identified in the Ministry of Health’s *Strategy to*

¹ Ministry of Health, *Strategy to prevent and minimise gambling harm 2019/20 to 2021/22*, 2019.

² Research First, *Casino Impact Report: An assessment of the social and economic impacts of the Grand Casino Dunedin*, 2022.

Prevent and Minimise Gambling Harm 2022/23 to 2024/25 as bearing a burden of harm that greatly outweighs that being experienced by other groups.

17. We are yet to see any specific harm minimisation strategies from DCL for these priority population groups.
18. PGF Services would also like to remind the Gambling Commission and DCL of their obligation to uphold the principles of Te Tiriti O Waitangi. The principle of active protection applies to all Māori people and to all Māori interests, including the protection from gambling harm caused by DCL.

Attendance at hearing

19. PGF Services is not seeking an opportunity to present this submission at the public hearing of this application.

Thank you again for the opportunity to provide a submission to the application by DCL. We also support the submissions made by the National Public Health Service (Te Whatu Ora) and the National Māori Gambling Harm Minimisation Public Health Collective.

Please contact us if you have any questions regarding this submission.

Ngā mihi nui,

Melissa Thompson
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PGF Group