

To The Gambling Commission,

I am writing in opposition to the renewal of Christchurch casino's gambling license.

Much of Christchurch Casino's submission rests on a survey of 658 gamblers undertaken on their premises. To put this number in context, it is less than 1% of the already biased sample of 60-75,000 people who visit their casino each month. Much of their claims of positive support from the people of Christchurch rest on these few persons. This flaw is highlighted by the commission's own independent reviewer.

Furthermore, their assessment of the impact of the casino on crime focuses only on street crime and police callouts. No serious attempt by the casino has been made to assess their contribution to white-collar crime, such as money laundering, known by-products of these establishments¹. The only evidence the casino can offer is that they have reported only a single incident in over a decade. One would expect 8-9 reports a year, being approximately a quarter the size of Skycity's casino who report 35 incidents a year, this is suggestive of a 'blind eye' attitude rather than successful controls.

Their 'blind eye' attitude also extends to their management of problem gambling. I refer you to the Internal Affairs document on your website that showed that two-thirds of the time, Christchurch Casino failed to act on problem gambling.

Much of the economic analysis of the casino rests on their employment of approximately 500 people, yet this information seems likely to be out of date given their current intent to lay off staff². Given that their impact is a slim margin of only 90 FTEs, any layoffs would severely alter their analysis which was conducted before this announcement.

However, the single greatest argument against this casino is demonstrated by this excerpt from The Press article³ written on the 31st July 2018: "Security shift managers were also trained to respond to customers at risk of suicide." Christchurch Casino knows that its operations induce depression and suicide in its customers. We all know this, but this is their tacit acknowledgement. How can we allow such a parasitic operation to continue knowing this?

Christchurch Casino will argue that they are better than the alternatives, the lesser of two evils. But it is an evil we can do well without, reject their submission.

Thank you for your time,

Ronan Whyte

¹ https://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=10451505

² <https://www.stuff.co.nz/business/103526522/christchurch-casino-consults-over-job-changes-for-staff>

³ <https://www.stuff.co.nz/business/105614371/claim-lives-destroyed-by-gambling-as-casino-seeks-licence-renewal>