

**Submission on application by Christchurch Casinos Limited for
Renewal of Casino Venue Licence under section 134 Gambling Act 2003**

You may use the below form to provide your feedback on the application by Christchurch Casinos Limited to renew their Casino Venue Licence for the Christchurch Casino, located at 30 Victoria Street, Christchurch. The full application can be read on the Gambling Commission's website [here](#).

To: The Gambling Commission

From: SKYCITY Entertainment Group Limited

Full name of submitter

1. I **support** / ~~oppose~~ / ~~am neutral to~~ the application by Christchurch Casinos Limited to renew their Casino Venue Licence. (*circle one*)
2. The reasons for my **support** / ~~opposition~~ / ~~neutrality~~ to the application are: (*please circle one, and use extra pages if necessary*)

New Zealand casinos, including Christchurch Casino and the SKYCITY Entertainment Group's casinos - SKYCITY Auckland, SKYCITY Hamilton, SKYCITY Queenstown Casino and Wharf Casino) operate within a highly regulated environment.

*A key intention of the Gambling Act 2003 ("**Act**") is controlling the growth of gambling and preventing and minimising the harm caused by gambling. Accordingly, under the Act, casinos are required to maintain requisite host responsibility standards, including:*

- *developing a policy for identifying problem gamblers*
- *providing information and advice about problem gambling to, and assisting, people who they have reason to believe may be problem gamblers*
- *issuing exclusion orders prohibiting such people from entering their gambling areas*

Casinos therefore provide a safer and more responsible gaming environment than other less regulated gaming venues. In this regard, the New Zealand casinos work collaboratively to ensure that, as an industry, they prevent and minimise the harm caused by gambling – for example, by the implementation of a multi-venue exclusion process across the New Zealand casinos and working collaboratively with problem gambling treatment providers.

The casino sector is also subject to the stringent requirements of the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and each casino operator in its capacity as a reporting entity has a range of obligations under that legislative regime. Non-compliance attracts significant penalties and active scrutiny and enforcement by the regulators, which should provide the community with comfort that appropriate systems and processes are in place to mitigate the risk of money laundering through casinos.

Casinos are also significant contributors to economic development generally in the regions in which they operate through:

- *their levels of employment*

- *their capital investments and operational expenditure*
 - *their payments of payroll tax and gaming taxes*
 - *their roles as tourist destinations*
 - *their community distributions as distributed by the charitable trusts established by the casinos*
3. I ~~would~~ / **would not** like to attend and be heard at the public hearing of the application. (*circle one*)
4. If you **would** like to attend and be heard at the public hearing, please explain below:
- your connection with the Casino;
 - why you are interested in the application; and
 - a brief outline of the information you could provide at the hearing to assist the Gambling Commission in making their decision on the application.

(please use extra pages if necessary)

6 August 2018

Email address: c/- jo.wong@skycity.co.nz
Jo Wong, General Counsel & Company Secretary
SKYCITY Entertainment Group Limited

Telephone: (09) 363 6143

Postal address: 86 Federal Street
Auckland 1010

Note to submitter

The closing date for submissions is the **8 August 2018**. The Gambling Commission must receive your submission by the closing date.

You can send your completed submission by email to:
info@gamblingcom.govt.nz

Or, you can send your completed submission by post to:
PO Box 137295, Parnell, Auckland 1052