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**Submission of the Synod of Victoria and Tasmania, Uniting Church
in Australia to the consultation on the *Future of Gaming in
Tasmania* policy
9 August 2021**

The Synod of Victoria and Tasmania, Uniting Church in Australia, welcomes the opportunity to provide a submission to the *Future of Gaming in Tasmania* policy.

The membership of the Synod's congregations has been concerned for a long time about the harms that certain forms of gambling are causing in our communities. At the 1999 meeting of representatives of the congregations, a resolution was passed stating:

To call on the State Government to implement strong consumer protection measures for gamblers through legislation to stop their exploitation by the gambling industry, including:

- (i) the establishment of adequately resourced, independent bodies to provide consumer protection for gamblers and to enforce legislation and regulations for consumer protection;*
- (ii) the provision for local government veto over the number of machines and new gaming venues; and*
- (iii) the provision of increased funding for recreational alternatives to gambling.*

The 2011 meeting of the congregation represented made the following resolution:

(b) To call on the State Government to implement strong consumer protection measures for gamblers through legislation to stop their exploitation by the gambling industry, including:

- (i) the establishment of adequately resourced, independent bodies to provide consumer protection for gamblers and to enforce legislation and regulations for consumer protection;*
- (ii) the provision for local government veto over the number of machines and new gaming venues; and*
- (iii) the provision of increased funding for recreational alternatives to gambling.*

The Synod continues to be of the view that EGMs should be removed from pubs and hotels. EGMs should only be in the casino as a destination gambling location. When forms of gambling are permitted by legislation, the Synod takes the view that the harm caused by gambling should be minimised, and the benefits to the community should be maximised. Thus, in the absence of removal of EGMs from hotels and clubs, the Synod supports a reduction in the state-wide cap.

We are disappointed the intended cap is higher than the existing number of EGMs in hotels and cubs currently.

In line with maximising the benefit from legalised forms of gambling, the Synod supports the proposed increases in tax on EGMs in pubs and clubs. However, the Synod would have preferred to see a progressive tax arrangement based on the average per machine income in a venue, which is already in place in Victoria, rather than a flat tax rate. The Synod would prefer to see venues that minimise harm from EGMs by not seeking to maximise losses on the machines rewarded with a lower tax rate.

The Synod supports the proposed increases in the Community Support Levy and that it is applied to the casinos.

The Synod opposes the massive tax break being provided on EGMs in the casinos, almost halving the tax that will be collected on these machines.

The Synod supports that the maximum number of EGM authorities that can be owned by an individual owner or ownership group cannot be more than 587, 25% of the EGM cap. The Synod believes it is in the interest of the community to reduce the ability of any single ownership group to capture the development of gambling policy in relation to EGMs.

The Synod supports that Venue Licences but believes they should last ten years rather than 20 years to allow the community a greater opportunity to rethink arrangements relating to EGMs if current arrangements result in levels of harm higher than the community finds tolerable. Ten years is a long time to give small businesses certainty. Most community service agencies that also have substantial capital investments get nothing like ten years of certainty from government contracts. Often such contracts are as short as one year.

The Synod opposes the two new casino licences, aiming to increase the number of casinos in Tasmania to four. The Synod is particularly concerned that if the two new "non-resident high-roller" casinos fail to attract sufficient wealthy people from overseas or interstate to gamble, the casino owners will be able to pressure the Tasmanian Government of the day to amend the legislation and their licences. The amendments would be so that low and middle-income Tasmanians can be targeted to come and gamble at the new casinos on forms of gambling targeted at people on these lower incomes. The government of the day would be under substantial pressure to not allow the new casinos to financially fail.

The Synod supports the proposed Object of Act.

The Synod believes the Bill should prohibit linked jackpots as they have been found to disproportionately cause people who are being harmed by gambling to spend even more. The September 2009 Victorian Government commissioned *A Study of Gambling in Victoria. Problem Gambling from a Public Health Perspective* found that the influence of linked jackpots increased the greater the risk the gambler had towards problem gambling. People with gambling problems were 75 times more likely to be influenced by linked jackpots compared to non-problem gamblers (p.149). At the same time, 84% of all gamblers said linked jackpots did not influence their gambling behaviour. However, 17.8% of people with gambling problems reported that linked jackpots were a significant influence on their gambling behaviour, and in total, 53% of people with gambling problems indicated that linked jackpots influenced their behaviour compared to just 6% of non-problem gamblers. Large jackpots were one cause of binge gambling (p. 182).

The Synod opposes the introduction of simulated racing events (such as the Trackside Racing Game) into hotels, clubs and totaliser outlets. There are already enough opportunities to game without adding animated horse races to gamble on. Further, the risk of gambling harm to people increases as forms of gambling become closer to being continuous, compared to forms of

gambling where there are breaks in gambling events. Introducing simulated racing events move gambling on horse racing away from being something people gamble on as discrete events to something that is more like continuous gambling.

The Synod supports that the period under which a person will have the opportunity to object to an application for a venue licence will be increased from 14 to 28 days. However, even this is a relatively short period of time for a local government to have to decide if it wishes to object to a venue licence application.

The Synod supports that the cost of an investigation by the Commission of a licence holder will need to be paid for by the licence holder.

The submitting bodies oppose the Social and Economic Impact Study to be conducted only every five years instead of every three years. As new gambling products are being introduced regularly, limiting the study to every five years means it can be a long time before the government will have data about increased harm from new gambling products. For example, the recent introduction in Australia of 'Lightning Link' and 'Dragon Link' EGMs has seen a significant increase in losses on these machines without an evaluation of the harm they may be causing.

The Synod believes the Bill should forbid arrangements where a venue licence holder can contract to a third party to operate their EGMs for a split of the profits from the EGMs. Such arrangements have been prohibited in Victoria. Such arrangements would encourage the third parties to seek to maximise losses through the EGMs to maximise their profit and increase the risks of gambling harm.

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