

3 February 2023

Gambling Regulator
Department of Internal Affairs
PO Box 805
WELLINGTON 6140

By email: gambling@dia.govt.nz

Tēnā koutou

DCC SUBMISSION ON PROPOSALS UNDER DEVELOPMENT FOR PERFORMANCE-BASED CLASS 4 LICENSING

Introduction

1. The Dunedin City Council (DCC) welcomes the opportunity to provide feedback to the Gambling Regulator at the Department of Internal Affairs on proposals under development for performance-based class 4 licensing.

Submission

2. The DCC supports changes to implement a more effective regime for gambling and TAB venues through regulatory changes.
3. The DCC supports the following proposals in the performance-based class 4 licensing discussion document if they can contribute to the reduction of harm from problem gambling, and to the refresh to aspects of the Gambling Act 2003 to ensure it remains fit for purpose:
 - due diligence regarding key persons in each gambling operation
 - greater transparency regarding individuals' interests, and management of conflicts of interest
 - assurance and evidence of how harm minimisation policies are being implemented in practice
 - targeted assessments of operating costs in comparison to the returns made to authorised purposes
 - grants processes and due diligence
 - organisational governance
4. In making this submission, the DCC notes its 2021 review of its Gambling and TAB Venue Policy. This Policy states that the DCC will not grant consent for the establishment of any new Class 4 gambling venues, or for an increase in numbers of electronic gaming machines within these venues.
5. As part of the Gambling and TAB Venue Policy review, the DCC resolved to lobby for a more sustainable model of funding for community organisations to replace the reliance

on gambling proceeds. While this is the Council's preference, it supports changes that will prevent and minimise harm through gambling.

6. Key themes from submitters to the DCC's Gambling and TAB Venue Policy review were concern at gambling related harm in the community and the reliance of community organisations on the proceeds of gambling, particularly sports groups.
7. The proposed changes to the Class 4 licensing system align with the strategic direction for vibrant and cohesive communities and for healthy and safe people set out in the DCC's Social Wellbeing Strategy 2013-2023.
8. The DCC is committed to the principles of the Treaty of Waitangi and to working in partnership with mana whenua and maata waka. Its view is that consistently successful engagement with iwi Māori results in better decision making, more robust and lasting solutions and more engaged people and communities.
9. The DCC sees reducing harm from gambling as an important avenue to better improve outcomes for Māori. Māori are disproportionately impacted by gambling harm. Article Two of the Treaty of Waitangi guarantees Māori authority over their taonga, including their hauora. The inequity that Māori experience currently should be a focus of the government's efforts to reduce the harm posed by gambling.

Conclusion

10. The DCC is pleased to submit in overall support of the proposals under development.

Yours faithfully



Jules Radich
MAYOR OF DUNEDIN