

25 September 2024

Ministry of Health
PO Box 5013
WELLINGTON 6140

By email: gamblingharm@health.govt.nz

Tēnā koutou

SUBMISSION ON DRAFT STRATEGY TO PREVENT AND MINIMISE GAMBLING HARM 2025/26 TO 2027/28

Introduction

1. The Dunedin City Council (DCC) welcomes the opportunity to submit feedback to the Ministry of Health Zealand Manatū Hauora on its draft Strategy to Prevent and Minimise Gambling Harm 2025/26 to 27/28 (the draft Strategy).
2. The DCC has shown a long-term and ongoing commitment to reducing gambling harm through its Gambling and TAB Venue Policy which takes a sinking lid approach to the number of venues and gambling machines in Ōtepoti Dunedin. This policy meets the DCC's obligations under the Gambling Act 2003 and the Racing Industry Act 2020.
3. The DCC makes this submission in the context of services to prevent and minimise gambling harm being significantly reduced in the city since 31 January 2024. The Salvation Army's Oasis programme was closed completely, and the Problem Gambling Foundation now has only one staff member in Ōtepoti Dunedin.

Submission

4. Overall the DCC submits in support of the intentions of the draft Strategy, but has a number of questions about its implementation.
5. The DCC queries how the goals in the draft Strategy will be implemented within the proposed timeframes, particularly after services have been disrupted when previous contracts ended. The DCC would like information about how capacity and competency will be rebuilt so that these goals can be achieved.
6. The DCC would like more information on how new services will be implemented and tailored for local needs and resourcing, including the balance between in-person and online service delivery.

7. The DCC commends the inclusion of people with lived experience and peer support as key parts of the service plan in the draft Strategy. The DCC seeks information about how this will be implemented in Ōtepoti Dunedin; for example, making connections with people with lived experience and how they can do peer support while located here.
8. The DCC understands that the current suite of services, implemented from February 2024, is to continue. Under the terms of the draft strategy, the DCC seeks clarity about how budget and client numbers will be allocated across New Zealand and how this is calculated based on data and needs assessment.
9. The DCC would like information about any future procurement processes for service delivery, including scope and timeframes.
10. The DCC's strategic directions include a commitment to the Treaty of Waitangi, implemented through Te Taki Haruru, its Māori Strategic Framework. The DCC is committed to the wellbeing of Māori and recognises Māori are disproportionately impacted by gambling harm. The draft Strategy does not include any reference to the Treaty of Waitangi. The Treaty was included as a principle in the previous strategy, along with its role in the health and disability system. The DCC requests that these be included again.
11. The DCC supports plans to regulate online casinos through a licensing system expected to come into effect in 2026.
12. The DCC would like Lotto to be recognised as a form of gambling that causes harm, and notes concern with the way Lotto is presented in television advertising.
13. In closing, the DCC thanks you for the opportunity to submit on the draft Strategy to Prevent and Minimise Gambling Harm 2025/26 to 27/28.
14. The DCC would like to speak to its submission at any hearings.

Ngā mihi,



Jules Radich
Mayor of Dunedin