

Gambling Venue Policy Consultation

September – October 2025

Full submission booklet

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Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 01/10/2025

First name: Elizabeth

Last name: Lomax

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

Yes

Please explain:

I think gambling should ONLY be allowed in stand alone venues. It should not be allowed anywhere alcohol is served or any other recreational activities that encourage recreational and problematic gambling.

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain: Ideally it should be reduced to zero, but definitely do not increase it.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain: Ideally it should be zero.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain: No new or "improved" gambling operations.

7. Do you have any other feedback or comments regarding the policy?

Ban pokies in pubs. It is so incredibly harmful to our communities and families. No amount of sports club funding negates the damage done by gambling addictions; from financial loss to the link to domestic abuse. I support the creation of stand-alone gambling venues (or trackside/sports venue located) such as a TAB but definitely do not support gambling being allowed to take place anywhere that serves alcohol.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 01/10/2025

First name: Patricia

Last name: King

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy Dangerous and Insanitary Buildings Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain: Place your bets at the races or the local pub.

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

They waste enough money on alcohol and tobacco already and then fine that they can't afford school shoes and food. Let's not add gambling to the list. Make this difficult to access.

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain: We don't want anymore venues.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain: 20 is enough.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain:

Unless we put them where the gamblers can't find them, they might as well stay where they are; ie pubs and clubs?

7. Do you have any other feedback or comments regarding the policy?

We lived in W.A., Australia for 6 years and found that that state banned casinos completely. What a good idea that was and nobody died because of the ban! Let's have the courage to follow suit.

Dangerous and Insanitary Buildings Policy

1. Do you support the draft policy as presented?

Yes

Please explain: Consistency seems to be the main goal and this is good.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 01/10/2025

First name: Gordon

Last name: Tupper

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

Yes

Please explain:

I support this proposal but would want to exclude any option for the premises to include gambling devices.

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain:

i do not support this propsoal and would like to see a reduction in the number from 5 to 3. I believe this would help reduce harm while maintaining choice and revenue for the premise operators

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain: I would support this on the basis that the cap is reduced.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain: The rationale for this allowance makes sense.

6. Do you agree with our other proposed changes?

No

Please explain:

I don't support the other proposed change, simply due to the size of our townships the application based on socio-economic rating is somewhat mute. I think the other controls will have better chance of managing the aims of this policy.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 02/10/2025

First name: Nicola

Last name: Van den Dorpe

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain:

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain:

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

No

please explain:

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain:

6. Do you agree with our other proposed changes?

Yes

Please explain:

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 02/10/2025

First name: Colin

Last name: Tew

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

Yes

Please explain:

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain: Not necessary.

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain:

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain: More than enough !

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain:

6. Do you agree with our other proposed changes?

No

Please explain:

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 02/10/2025

First name: Cliff

Last name: DOWNES

Organisation: Ashburton Club & MSA

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

Yes

Please explain: Not highly likely to happen

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain: There are already sufficient locations within Ashburton

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain: Reduce temptation

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

No

please explain: Believe there are currently sufficient venues.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain: Circumstances change that may require relocation.

6. Do you agree with our other proposed changes?

Yes

Please explain: N/A

7. Do you have any other feedback or comments regarding the policy?

N/A

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 03/10/2025

First name: Alf

Last name: James

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy Dangerous and Insanitary Buildings Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain: We need fewer, not more, gambling opportunities in our community.

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

Reasons are obvious, assuming our elected decision makers have any understanding or empathy for people in high deprivation areas.

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain: But would refer a sinking lid.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

No

please explain: Would prefer a sinking lid.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain: Leadership that cares would take every opportunity to reduce this hazard.

7. Do you have any other feedback or comments regarding the policy?

Yes. Council needs to advocate firmly against plans to tax online betting without putting money back into communities. Online betting drives the problem underground and will reduce funding for community groups.

Dangerous and Insanitary Buildings Policy

1. Do you support the draft policy as presented?

Yes

Please explain: It seems to be a simple tidy-up for legal compliance reasons.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 04/10/2025

First name: Patricia

Last name: Pedofsky

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain:

I do not believe the existing self regulation policy will reduce the harmful effects of gambling. We do not need to establish Stand alone TAB venues.

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

We need to be mindful of the harm to low - medium socio economic and vulnerable people in our community.

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain: Will this cap of machines be Monitored to check no increase above this cap?

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain:

As well, There should be a cap of only 5 machines for any venue. Ashburton already has a high level of gambling machines compared to other Canterbury districts.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain:

Only with strict controls - not in high deprivation areas. Limiting their existing machines to half their number.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 05/10/2025

First name: marion

Last name: logan

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain:

gambling is addictive for some people. often as people are more desperate they turn to high risk activities. this will adversely effect the already disadvantaged. yes gambling can be accessed by other means but this is just increasing to likelihood

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

No

Please explain: ashburton is small . yes don't have in areas of high deprivation and don't increase by any

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain: i support no more machines. if that is rejected then 2 not 5

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

No

please explain: no keep at 12. it's blood money- feeding off peoples addictions and stress

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain: if to reduce harm

6. Do you agree with our other proposed changes?

No

Please explain:

7. Do you have any other feedback or comments regarding the policy?

increased locations/machines will increase spending. it is taking advantage of addicts and those more vulnerable . this follows through to a much wider group including children.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 06/10/2025

First name: Jarrod

Last name: True

Organisation:

The Gaming Machine Association of New Zealand

Would you like to present your submission in person at a hearing?

Yes

Please indicate if you want to present at the hearing in person or virtually:

Feedback

What policy are you submitting on?

Gambling Venue Policy

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain: Opposes the cap of five machines for new venues.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain:

Supports the 20-venue cap. The proposed cap of 20 venues is reasonable given the current environment of high regulation and naturally reducing machine numbers. There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last 15 years, the problem gambling rate has remained static, despite gaming machine numbers declining by over 25%.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain:

The proposed relocation policy is sensible and fully supported. In September 2013, Parliament recognised the merit in enabling venues to relocate, and expressly amended the Gambling Act 2003 to enable venues to relocate and retain the same number of machines when a relocation consent was obtained. Venue relocation is a harm minimisation tool. It is good that the proposed policy enables venues to relocate out of a high deprivation area to a lower deprivation area. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in high deprivation locations. It is good that the proposed policy enables venues to relocate out of a suburban/residential area to a more suitable area, such as a central business district. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in undesirable residential locations. It is good that the proposed policy supports businesses that wish to move to new, modern, refurbished premises. Allowing local businesses to upgrade their premises and provide a more modern, attractive offering to the public helps to revitalise business districts, improves the local economy and encourages tourism.

7. Do you have any other feedback or comments regarding the policy?

Please see full submission attached.

Attached Documents

Name
GMANZ Submission to Ashburton District Council 

The Gaming Machine Association of New Zealand’s Submission on Ashburton District Council’s Gambling Venue Policy

Introduction

1. The Gaming Machine Association of New Zealand (“the Association”) represents the vast majority of the gaming machine societies that operate in New Zealand. The Association wishes to provide Ashburton District Council with pertinent information regarding gaming machine gambling to help council to make a balanced, evidence-based decision.

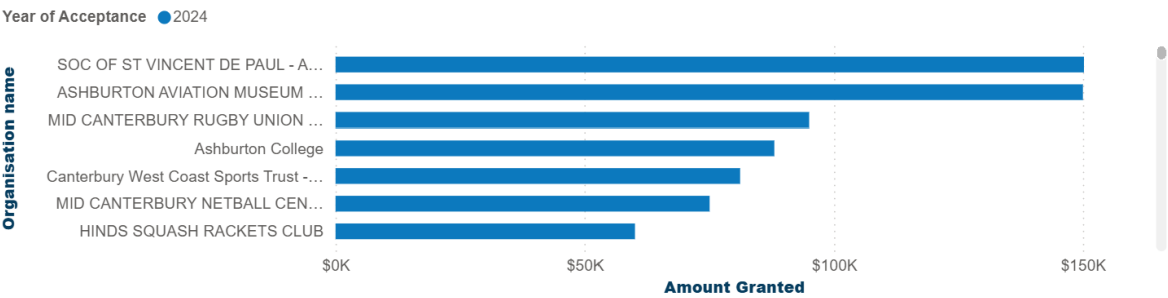
Summary

2. The Association:
- Supports the new relocation provision;
 - Opposes the cap of five machines for new venues; and
 - Supports the 20 venue cap.

Local Data and Information

3. The amount of grants made to Ashburton District-based organisations is posted on the granted.govt.nz website. In 2024, grants totalling **\$2,209,649.00** were made to the Ashburton District:

Amount Granted by Organisation



4. In addition to the external grants, club venues use the proceeds from the machines to support their members and their club facilities. Two of the 11 venues that operate gaming machines in the Ashburton District are club venues: the Ashburton Club with 18 gaming machines, and the Ashburton RSA with 14 gaming machines.
5. Local gaming machines numbers continue to decline. In March 2015, the Ashburton District had 154 gaming machines. In June 2025, the District had only 131 gaming machines.

6. Problem gambling presentations from persons based in the Ashburton District are extremely low. The Ministry of Health keeps a record of the number of people in each territorial authority who seek help via the phone, text, email or face-to-face counselling services that are available. The Ashburton District presentation data¹ (Table 10 – excludes brief interventions) are as follows:

2020/21	new clients 1	total clients seen 7
2021/22	new clients 3	total clients seen 6
2022/23	new clients 2	total clients seen 4

Relocation Policy

7. The proposed relocation policy is sensible and fully supported.
8. In September 2013, Parliament recognised the merit in enabling venues to relocate, and expressly amended the Gambling Act 2003 to enable venues to relocate and retain the same number of machines when a relocation consent was obtained.
9. Venue relocation is a harm minimisation tool.
10. It is good that the proposed policy enables venues to relocate out of a high deprivation area to a lower deprivation area. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in high deprivation locations.
11. It is good that the proposed policy enables venues to relocate out of a suburban/residential area to a more suitable area, such as a central business district. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in undesirable residential locations.
12. It is good that the proposed policy supports businesses that wish to move to new, modern, refurbished premises. Allowing local businesses to upgrade their premises and provide a more modern, attractive offering to the public helps to revitalise business districts, improves the local economy and encourages tourism.
13. The first venue to relocate under the amendments made to the Gambling Act 2003 was the Te Rapa Tavern in Hamilton. The photos below show the old, rundown premises and the new modern premises. The redevelopment cost \$3,000,000.

¹ <https://www.health.govt.nz/statistics-research/statistics-and-data-sets/problem-gambling/gambling-harm-services-data#toc-0-1>



The old Te Rapa Tavern



The new Te Rapa Tavern

14. It is good that the proposed policy enables venues to move to smaller, more suitable premises. Enabling venues to move away from large premises, with large car parking areas, to newer, smaller premises also has the advantage of freeing up large areas of land, which may be better used for affordable high-density housing.
15. It is good that the proposed policy enables venues to move out of earthquake-prone buildings to stronger, more modern buildings. This is a health and safety issue.
16. It is also reasonable to allow venues to relocate when the move is due to onerous rental sums or lease terms being imposed. Currently, once a venue has obtained a licence to host gaming machines its value is artificially increased. This often leads to landlords demanding higher than normal rentals. Allowing more flexible relocation prevents landlords demanding unreasonable rentals as it gives the venue operator the ability to relocate to an alternative venue.

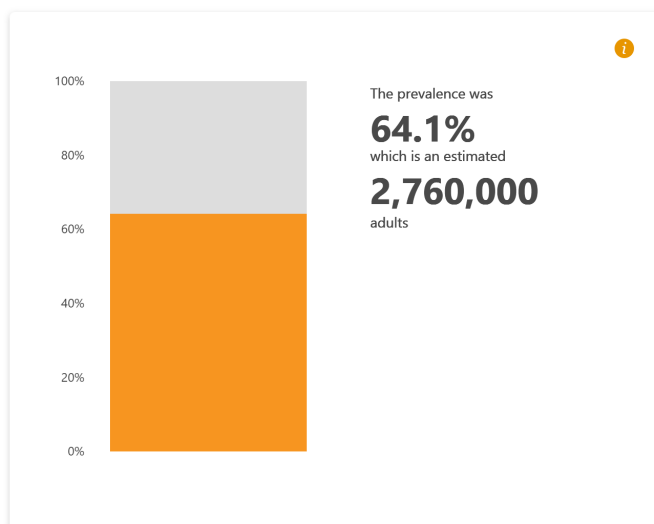
Five Machine Limit Per Venue

17. The limit of five machines for new venues should be removed and replace with the national cap of nine machines.
18. The Gambling Act expressly permits nine-machine venues. There is no research or evidence to support departing from the national nine-machine limit.
19. Nine machines give customers a greater choice of games to play, which improves the entertainment offering.
20. A venue with five machines will have a lower community return rate than a nine-machine venue due to the fixed costs that are incurred. Regardless of the number of machines at a venue, the venue needs to have an electronic monitoring system installed, a gaming room constructed, signage, regular staff training, regular compliance checks, and a formal gaming licence. In a standard gaming room these fixed costs can be offset from the revenue from all nine machines. When a five-machine venue has to bear the burden of these costs, the rate of return to the community is diminished.

Benefits from Gaming Machines - Gambling is an Enjoyable Activity

21. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2025 New Zealand Gambling Survey² found that 64.1% of adult New Zealanders had participated in some form of gambling in the previous 12 months (estimated to be 2,760,000.00 New Zealanders aged 15 and over).

2023/24 New Zealand Gambling Survey



22. The majority of people who gamble do so because they find it an enjoyable activity. This was observed by Suits (1979, p. 155)³, who stated:

Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.

23. Gambling for the non-addicted gambler may also be an avenue for socialising, stress relief and a way of having fun. Contrary to how it may appear from a non-gambler's perspective, gamblers do not necessarily anticipate they will make money from gambling. Parke (2015)⁴ stated:

² <https://kupe.healthpromotion.govt.nz/nzgs/participation-frequency-and-expenditure/any-gambling/any-gambling-activity/>

³ Suits, D. (1979). The Elasticity of Demand for Gambling. The Quarterly Journal of Economics, 93(1), 155–162.

⁴ Parke, J. (2015). Gambling, leisure and pleasure: Exploring psychosocial need satisfaction in gambling. Presentation at the KPMG eGaming summit. <https://assets.kpmg/content/dam/kpmg/pdf/2016/07/im-esummit-report-2015.pdf>.

Players mostly realise that they are paying for a leisure experience. They are not expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.

Benefits from Gaming Machines - Positive Wellbeing Impact from Gambling in New Zealand

24. The 2021 TDB Advisory report, *Gambling in New Zealand: A National Wellbeing Analysis*⁵, found that gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.74b to \$2.16b per annum.



Revenue Breakdown

25. The return to players on a non-casino gaming machine is required to be set between 78% and 92%, with most being set at 91.5%. On average, for every \$1.00 gambled, 91.5 cents are returned to the player in winnings. The money retained is typically allocated as follows:

Typical Distribution of Gaming Machine Profits

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	1.08%	1.23%
DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.53%	43.16%

5 https://www.gamblinglaw.co.nz/download/Gambling_in_New_Zealand.pdf

Gaming Machines – Key Facts

26. Gaming machines have been present in New Zealand communities since the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued to Pub Charity on 25 March 1988, over 37 years ago.
27. New Zealand has a very low problem gambling rate by international standards. The March 2025 New Zealand National Gambling Survey⁶ found that the combined rate of moderate-risk gambling and problem gambling was 2.4% of the adult population (aged 15+). This equates to approximately 104,000 adults. A subsequent OIA request⁷ revealed that this was comprised of 0.5% problem gambling and 1.9% moderate risk gambling. The problem gambling rate is for all forms of gambling, not just gaming machine gambling.
28. All gaming machine societies contribute to a problem gambling fund. This fund provides over \$25 million per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The funding is ring-fenced and not able to be redirected to other health areas.
29. An excellent, well-funded problem gambling treatment service exists. The problem gambling helpline is available 24 hours a day, 365 days per year. Free, confidential help is available in 40 different languages. Free face-to-face counselling is also available, and specialist counselling is available for Māori, Pasifika and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).

Existing Gaming Machine Safeguards

30. Adopting a more restrictive policy is not necessary given the significant measures that are already in place to minimise the harm from gaming machines.
31. Gamblers are now only permitted to make one cash withdrawal per day. If a second cash withdrawal is made, the venue staff are required to talk to the player about their gambling and complete a two-page report about the person's gambling. That report must then be reviewed by the venue manager within seven days.
32. ATMs are excluded from all gaming rooms. ATMs at gaming venues must be in direct line of sight from the main bar area or main customer service area.
33. Gaming machines cannot be visible from outside the venue.
34. Venue staff are required to undertake three formal sweeps of the gaming room per hour and keep a detailed record of each sweep.

⁶ <https://kupe.healthpromotion.govt.nz/nzgs/gambling-harm/problem-gambling-severity-index/>

⁷ https://www.gamblinglaw.co.nz/download/OIA_Problem_Gambling_Rate_March_2025.pdf

35. Limits exist on the type of venues that can host gaming machines. The primary activity of all gaming venues must be focused on persons over 18 years of age. For example, it is prohibited to have gaming machines in venues such as sports stadiums, internet cafes, and cinemas.
36. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
37. There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won. The maximum stake is \$2.50. The maximum prize for a non-jackpot machine is \$500.00. The maximum prize for a jackpot-linked machine is \$1,000.00.
38. All gaming machines in New Zealand have a feature that interrupts play and displays a pop-up message. The pop-up message informs the player of the duration of the player's session, the amount spent, and the amount won or lost. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.
39. Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
40. All gaming venues have a harm minimisation policy.
41. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
42. All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.
43. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
44. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
45. It is not permissible for a player to play two gaming machines at once.
46. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
47. The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).
48. It is not permissible to use the word "jackpot" or any similar word in advertising that is visible from outside a venue.

The Proposed Cap of 20 Venues is Reasonable

49. The proposed cap of 20 venues is reasonable given the current environment of high regulation and naturally reducing machine numbers.
50. There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last 15 years, the problem gambling rate has remained static, despite gaming machine numbers declining by over 25%.
51. The 2012 National Gambling Survey⁸ concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report stated on pages 17 and 18:

Problem gambling and related harms probably reduced significantly during the 1990s but have since remained at about the same level despite reductions in non-casino EGM numbers and the expansion of regulatory, public health and treatment measures. Given that gambling availability expanded markedly since 1987 and official expenditure continued to increase until 2004, these findings are consistent with the adaptation hypothesis. This hypothesis proposes that while gambling problems increase when high risk forms of gambling are first introduced and made widely available, over time individual and environmental adaptations occur that lead to problem reduction.

52. The New Zealand National Gambling Study: Wave 3 (2014)⁹ noted that the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing. The report stated on page 19:

In contrast to the 1990s, there is no evidence that problem gambling prevalence decreased with decreasing participation rates during the 2000s. When methodological differences between studies are taken into account, it appears that problem gambling prevalence has remained much the same during the past 10 to 15 years.

...gambling participation has decreased substantially in New Zealand during the past 20 years, and problem gambling and related harm has probably plateaued...

53. Professor Max Abbott is New Zealand's leading expert on problem gambling. In 2006, Professor Abbott published a paper titled *Do EGMs and Problem Gambling Go Together Like a Horse and Carriage?* The paper noted that gaming machine reductions and the introduction of caps generally appear to have little impact on problem gambling rates. Professor Abbott noted:

EGM reductions and the introduction of caps generally appear to have little impact (page 1).

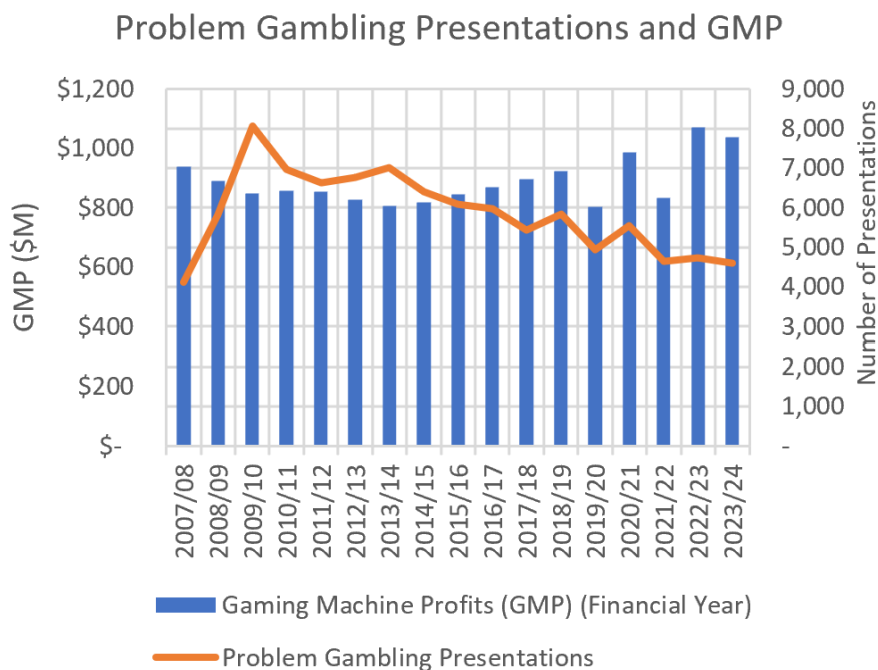
⁸ <https://www.gamblinglaw.co.nz/download/national-gambling-study-report-2.pdf>

⁹ https://www.gamblinglaw.co.nz/download/NZ_National_Gambling_Study_Wave4_2015.pdf

Over time, years rather than decades, adaptation ('host' immunity and protective environmental changes) typically occurs and problem levels reduce, even in the face of increasing exposure (page 6).

Contrary to expectation, as indicated previously, although EGM numbers and expenditure increased substantially in New Zealand from 1991 to 1999, the percentage of adults who gambled weekly dropped from 48% to 40%. This is of particular interest because it suggests that greater availability and expenditure do not necessarily increase high-risk exposure (page 14).

54. There is no direct correlation between gaming machine spend and problem gambling presentations:



Source: DIA website: https://catalogue.data.govt.nz/dataset/class-4-gambling-key-performance-indicators/resource/4893f532-b4b8-4966-b33c-de3836817a49?inner_span=True

55. Adopting a more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups based in Ashburton District. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar that has gaming machines, or worse, may move to another form of gambling such as offshore-based internet and mobile phone gambling.

Unintended Consequences – Increase in Internet and Mobile Phone Gambling

56. Any reduction in the local gaming machine offering may have unintended consequences, as this may simply lead to a migration of the gambling spend to offshore internet- and

mobile-based offerings. While it is illegal to advertise overseas gambling in New Zealand, it is not illegal to participate in gambling on an overseas-based website or mobile phone application.



57. It now takes only a simple search and a few minutes to download to your computer, tablet, or mobile phone any type of casino game you desire, including an exact replica of the gaming machine programs currently available in New Zealand venues.
58. The 2020 Health and Lifestyle Survey found that 1 in 4 New Zealand adults participated in some form of online gambling, with 19% participating almost every week.¹⁰

In the last 12 months,

1 in 4 (27%) New Zealand adults participated in some form of online gambling.

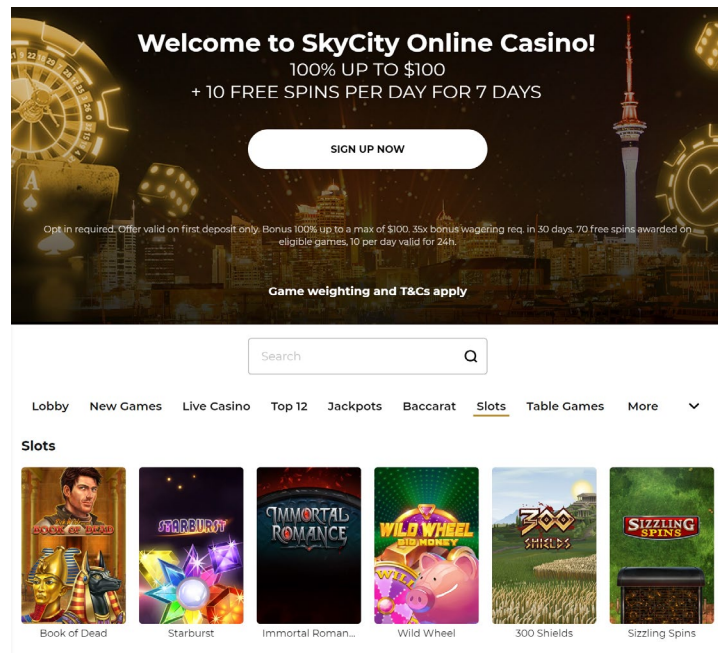


19% of online gamblers participated in online gambling almost every week.



59. TAB New Zealand's online channels make up over 80% of its betting turnover.
60. SkyCity has a very popular offshore-based online casino with a large selection of gaming machine games.

¹⁰ https://www.gamblinglaw.co.nz/download/2020_Health_and_Lifestyles_Survey_report.pdf



61. TAB New Zealand estimates that the total online spend with offshore gambling websites by New Zealanders for the 12 months to August 2020 was \$570-\$580m.
62. In March 2022, Kiwibank advised¹¹ that its customers were spending around \$30 million every month playing on online gambling sites. Kiwibank is only one bank; one of the smaller banks.
63. The migration from physical Lotto stores and SkyCity was apparent during the Covid-19 lockdowns. When the physical venues were closed, the number of online registered players, and the amount of online revenue, skyrocketed:

‘MyLotto’:

- 2018 748,000 registered players.
- 2020 1,230,000 registered players.

- 2018 \$201m spend.
- 2020 \$430m spend.

SkyCity online casino:

- 2018 25,661 registered players.
- 2020 48,958 registered players.

- 2018 \$254m spend.
- 2020 \$793m spend.

¹¹ <https://www.newshub.co.nz/home/new-zealand/2022/03/kiwibank-customers-spending-30m-every-month-playing-on-online-gambling-sites.html>

64. The Australian National University 2024 study *Gambling Participation in Australia 2024, Trends Over Time, and Profiles Associated with Online Gambling*¹² confirmed the player migration from physical gambling venues to online. The study found at page 6:

Our data also suggest that these individuals may have ‘switched’ their gambling activity from venue-based gambling (e.g. EGM gambling) to activities that are readily available online in Australia, such as betting on sports and racing. This may reflect [an] increase in overall online gambling participation that has been observed prior to COVID-19.

65. Offshore-based online gambling poses considerable risks because it:

- Is highly accessible, being available 24 hours a day from the comfort and privacy of your home;
- Has no restrictions on bet sizes;
- Has no capacity for venue staff to observe and assist people in trouble;
- Reaches new groups of people who may be vulnerable to the medium;
- Provides no guaranteed return to players;
- Is more easily abused by minors;
- Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and
- Is unregulated, so on-line gamblers are often encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer’s account for each friend that they induce to also open an account and deposit funds.

66. Offshore-based online gambling does not generate any community funding for New Zealanders, and does not make any contribution to the New Zealand health and treatment services, as no contribution is made to the problem gambling levy.

67. The Government has recently confirmed that it has made a decision to regulate online casino gambling and issue online gambling licences from July 2026. The introduction of a licensing system will enable offshore-based online providers to market and advertise more freely, which will lead to even greater growth. While the online providers will be licensed and required to pay gaming duty, they will not be required to make any community grants and may remain entirely based offshore (no local employment and all profits being removed from New Zealand).

¹² https://www.gamblinglaw.co.nz/download/Gambling_in_Australia_2024_002.pdf

Oral Hearing

68. Jarrod True, on behalf of the Gaming Machine Association of New Zealand, would like to make a presentation at the upcoming oral hearing.

2 October 2025

Jarrod True

Counsel

Gaming Machine Association of New Zealand

gmanz.org.nz

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 08/10/2025

First name: Jo

Last name: Salsbury

Organisation: New Zealand Community Trust

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain:

New Zealand Community Trust (NZCT) supports Council's proposed gaming policy – introducing a cap of 20 venues on machines alongside a new flexible relocation policy.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain:

New Zealand Community Trust (NZCT) supports Council's proposed gaming policy – introducing a cap of 20 venues on machines alongside a new flexible relocation policy.

7. Do you have any other feedback or comments regarding the policy?

Refer to attached submission.

Attached Documents

Name
251008 Ashburton General submission updated_

NZCT Submission – Ashburton Class 4 Gambling Policy Review



Support for Introducing a 20 Venue Class 4 Gambling Policy Cap

New Zealand Community Trust (NZCT) supports Council's proposed gaming policy – introducing a cap of 20 venues on machines alongside a new flexible relocation policy.

The new policy supports a system that provides your district with a popular form of entertainment that also delivers extensive community benefits.

Benefits of a Class 4 Gambling Policy Cap

Support for Local Community

Under a cap, your community will continue to significantly benefit from gaming machine funding. In the 2023 calendar year, \$1,565,346 of pokie funding was invested into a wide range of sporting, cultural, educational, and other community good in the Ashburton District.

Class 4 funding supports Council's bottom line both through grants directly awarded to Council and indirectly through grants to community organisations in your district that help them to be able to afford to pay for the use of Council-owned fields and facilities. Class 4 grants also help Ashburton rate-paying businesses to be sustainable when Class 4 grants are used to purchase their local goods and services.

Sinking Lids Do Not Reduce Gambling Harm

Although your draft policy does not include the adoption of a sinking lid, it is important to understand that the belief that sinking lid policies reduce the prevalence of problem gambling in a community is not supported by the facts as evidenced by DIA and Ministry of Health data.

Since 2003, many councils around New Zealand have adopted sinking lid policies, and there has been a reduction of 11,000 pokie machines – a 44% decrease¹.

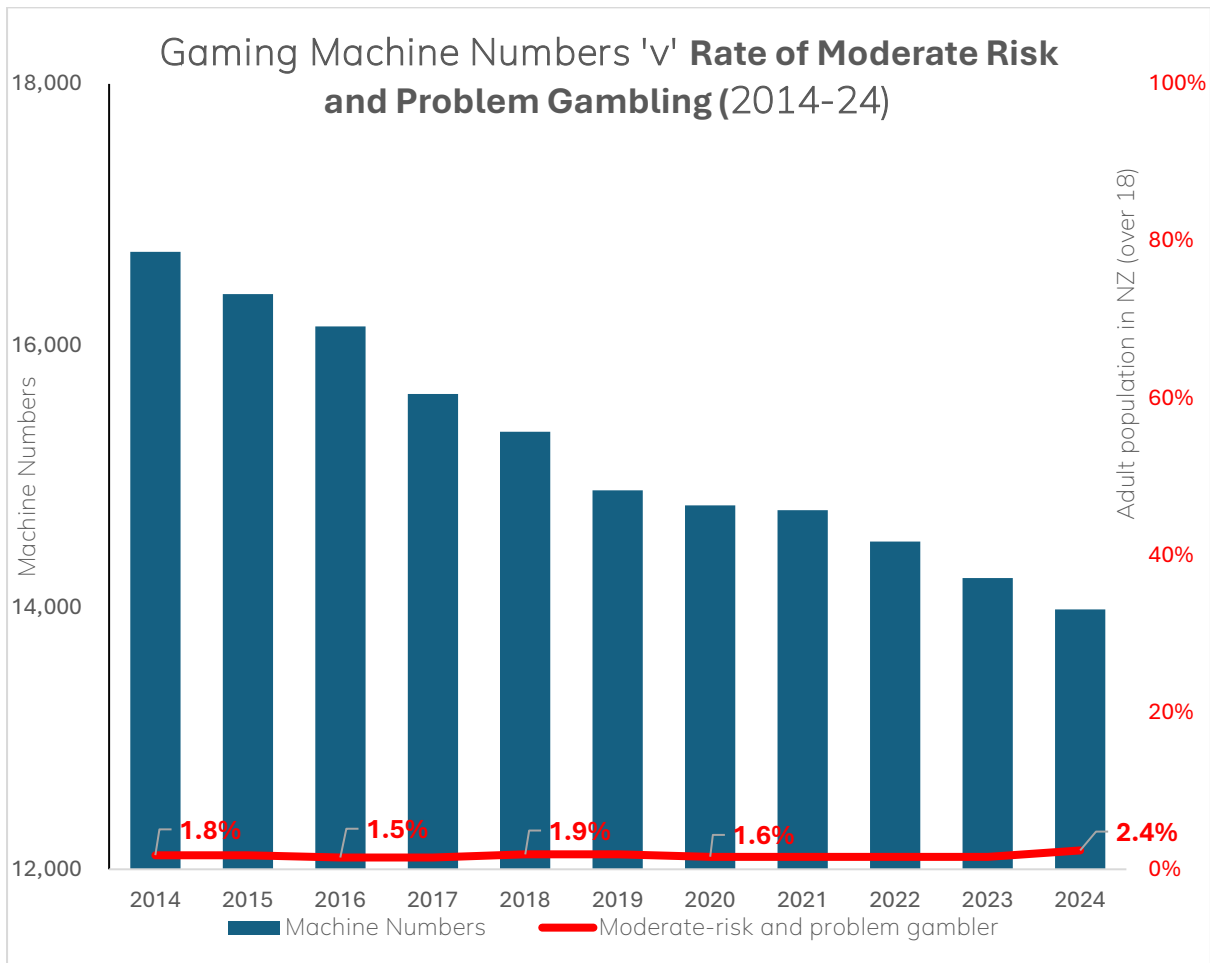
In 2014, the percentage of New Zealand adults (18 years plus) defined as moderate risk or problem gamblers was 1.8%. In 2018, it was 2.4%.²

Health NZ data visualised in the graph overleaf clearly shows there is no correlation between sinking lid policies and a reduction in gambling-related harm.³

¹ <https://www.dia.govt.nz/gambling-statistics-historical-data-machine-numbers>

² <https://www.health.govt.nz/statistics-research/surveys/new-zealand-gambling-survey>

³ <https://www.dia.govt.nz/gambling-statistics-historical-data-venues-machine-numbers>
Kupe - Data Explorer



* Note that the problem gambling rate measures ALL forms of gambling – meaning pokies make up approximately half of the 2.4% of moderate-risk and problem gamblers shown above.⁴

New Zealand’s Problem Gambling rate

In response to an OIA request, the Ministry of Health explains that the 2024 percentage split for moderate-risk gamblers and high-risk (problem) gamblers is as per the table below.⁵

	Total
Problem Gambling Severity Index (PGSI)	% (95CI)
High-risk (problem) gambler	0.5*(0.2-0.8)
Moderate-risk gambler	1.9 (1.5-2.5)

*Health NZ states that the result should be viewed as unreliable, and caution should be used when interpreting the result, as Relative Standard Error is between 0.25 and 0.5.

⁴ 2020 Health and Lifestyles Survey - 50.3% of those who played EGMs in pubs or clubs at least once a month experienced some level of gambling harm

⁵ *Ministry of Health Response to NZCT OIA request 16th April 2025 (attached as appendix)

It is important to note that moderate-risk gamblers and problem gamblers are by definition distinctly different.

The Canadian Problem Gambling Index (CPGI) which the Ministry of Health uses as the template for its Problem Gambling Severity Index (PGSI), characterises ‘problem gamblers’ as people who experience harm⁶. ‘Moderate risk’ gamblers are defined as people who *‘may or may not have experienced adverse consequences from gambling.’* To be clear, this category does not describe a uniform group of people that experience moderate levels of harm. Some submissions may explain that ‘low risk’ gamblers also experience harm (at low levels). But the PGSI states that *“...[t]his group likely will not have experienced any adverse consequences from gambling”*.

Problem Gambling in context

New Zealand’s rate of problem gambling is low by international standards.⁷

Comparing National Problem Gambling Prevalence Rates

Jurisdiction	Year	Problem Gambling Rate
USA	2015	4.60%
South Africa	2013	3.20%
Macau	2005	2.50%
Czech Republic	2014	2.30%
Cyprus	2012	2.20%
Northern Ireland	2010	2.20%
Canada	2005	2.00%
Hong Kong	2012	1.90%
Hungary	2012	1.90%
Germany	2015	1.70%
Brazil	2010	1.30%
Italy	2010	1.27%
Denmark	2012	0.90%
Iceland	2015	0.80%
Great Britain	2012	0.70%
Finland	2014	0.60%
South Korea	2013	0.50%
Singapore	2015	0.50%
France	2015	0.50%
Australia	2016	0.40%
Norway	2009	0.40%
Sweden	2014	0.30%
New Zealand	2015	0.20%

⁶ Canadian Problem Gambling Index: Final Report Feb 19, 2001

⁷ Calado F, Griffiths MD. Problem gambling worldwide: An update and systematic review of empirical research (2000-2015). *Journal of Behavioral Addictions* 2016; 5(4): 592-613. Doi:10.1556/2006.5.2016.073

Relatively few New Zealanders are gambling at levels that lead to negative consequences; most people who gamble on gaming machines have fun and experience no harm. Most pokie players know to stop when it stops being fun.

For further context, whilst problem Class 4 gambling in New Zealand occurs at a rate of 0.5% among the adult population the rate of hazardous drinking (have drunk hazardously in a way that can harm themselves or others⁸) was 16.6%, which is equivalent to about 720,000 adults⁹.

Despite the rate of hazardous alcohol consumption being more than seven times greater than problem Class 4 gambling, few would argue for the closure of pubs to protect those that are susceptible to hazardous alcohol consumption as it would be an unfair and disproportionate response for the 83.4% of adults who can enjoy pub hospitality responsibly. Similarly, a sinking lid Council gaming policy aims to eliminate a legal and popular form of gambling entertainment which 97.6% of adult New Zealanders can engage with responsibly.

History shows that prohibition is not effective at eliminating harm and invariably results in unintended consequences. Eliminating pokie lounges over time does not address the root causes of problem gambling, especially since individuals can now easily shift to online gambling, which is available 24/7, has fewer controls as physical in venue Class 4 gaming environments, and currently provides no return to the community in the form of grants.

Finally, the New Zealand Gambling Study Wave 4 (2015) assigns no causative effects to problem gambling in terms of certain other negative experiences a person may be suffering when it states that problem gambling is “*highly co-morbid with substance use disorders and other behavioural addictions, as well as with mood, anxiety and personality disorders*”¹⁰. In fact, the study indicates that “*relationships between gambling and other mental health disorders are complex, prospective studies have found that substance use, substance use disorders and behavioural addictions are robust predictors of problem gambling onset...*”¹¹ rather than the reverse.

Class 4 is Heavily Regulated

Despite the number of problem gamblers being very small, Class 4 sector works hard to minimise harmful behaviours. The Class 4 sector contributes over half of the annual \$20 million problem gambling levy that funds a nationwide network of problem gambling services. Additionally, NZCT alone invests \$650,000 annually in harm minimisation initiatives, including staff training, resources, and technology.

Pokie lounges operate within strict harm minimisation regulations, with staff trained to identify and intervene when they observe signs of harm. For example, venue staff must undertake record-keeping sweeps of gaming rooms every 20 minutes to monitor for, and act on, signs of harm. Furthermore, venue staff must discuss with a customer their gambling activity upon a customer's second attempt to withdrawal money from an in-venue ATM for the purposes of additional in-venue Class 4 gambling.

⁸ [Alcohol Resources — Key facts about drinking in New Zealand](#)

⁹ <https://www.health.govt.nz/publications/annual-update-of-key-results-202324-new-zealand-health-survey>

¹⁰ Pg 26 - <https://www.health.govt.nz/system/files/2018-08/national-gambling-study-report-6-aug18.pdf>

¹¹ Pg 26 - <https://www.health.govt.nz/system/files/2018-08/national-gambling-study-report-6-aug18.pdf>

Responsible Management and Enhanced Harm Minimisation Regulations

The regulatory framework for Class 4 gambling ensures gaming lounge activities are managed with transparency and accountability. Recent updates to these regulations have strengthened oversight, further promoting responsible gambling practices and enhancing community trust.

The stringent harm minimisation regulations provide even greater protections for individuals who are susceptible to harm. A cap is a balanced approach that maintains the provision of a legal form of entertainment in your community that enhances your district's hospitality offerings and generates community funding from discretionary income.

Online Gambling

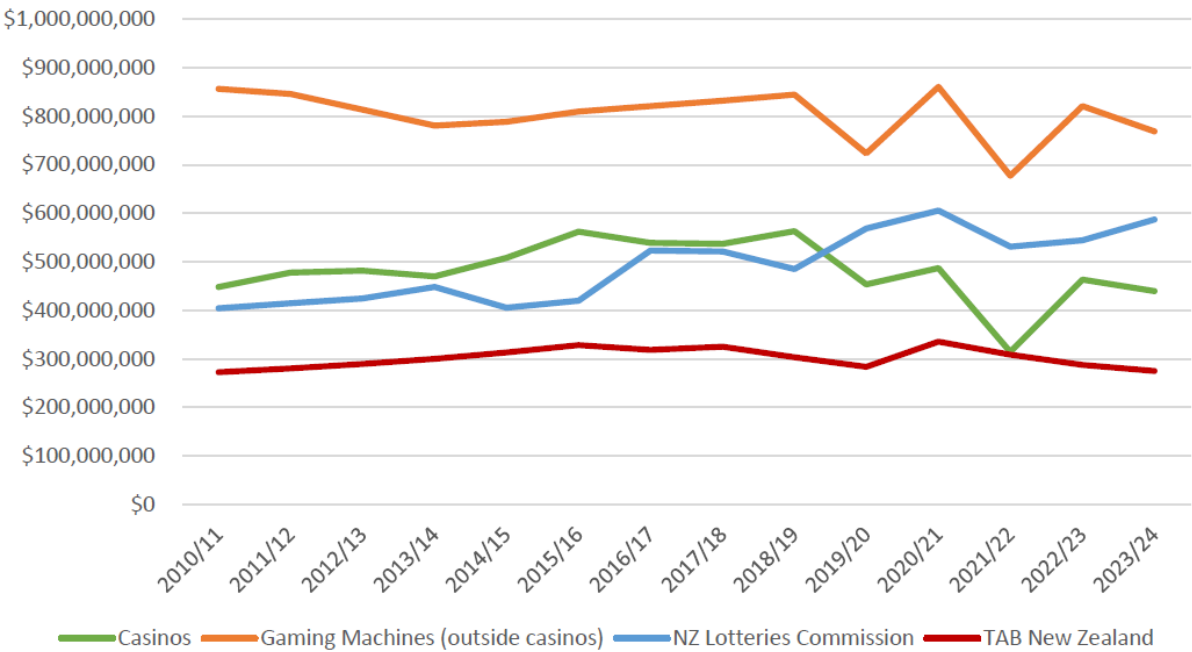
With the emergence of online gambling, it is unclear what effect sinking lids are having in migrating problem gamblers online where there are fewer protections against problem gambling compared to those provided by physical in person Class 4 venues.

During the COVID lockdown many people started gambling online across all forms of gambling. When the COVID lockdowns ended, Class 4 gambling eventually returned to pre-COVID levels. However, online gambling continues to grow. No research exists to indicate whether people who play Class 4 gaming machines are not also gambling online.

Class 4 Spending is Not Growing

While Class 4 still accounts for the largest share of annual gambling expenditure in New Zealand, spending is trending down on all forms of gambling – except for the NZ Lotteries Commission (NZLC) – as illustrated in the graph below.

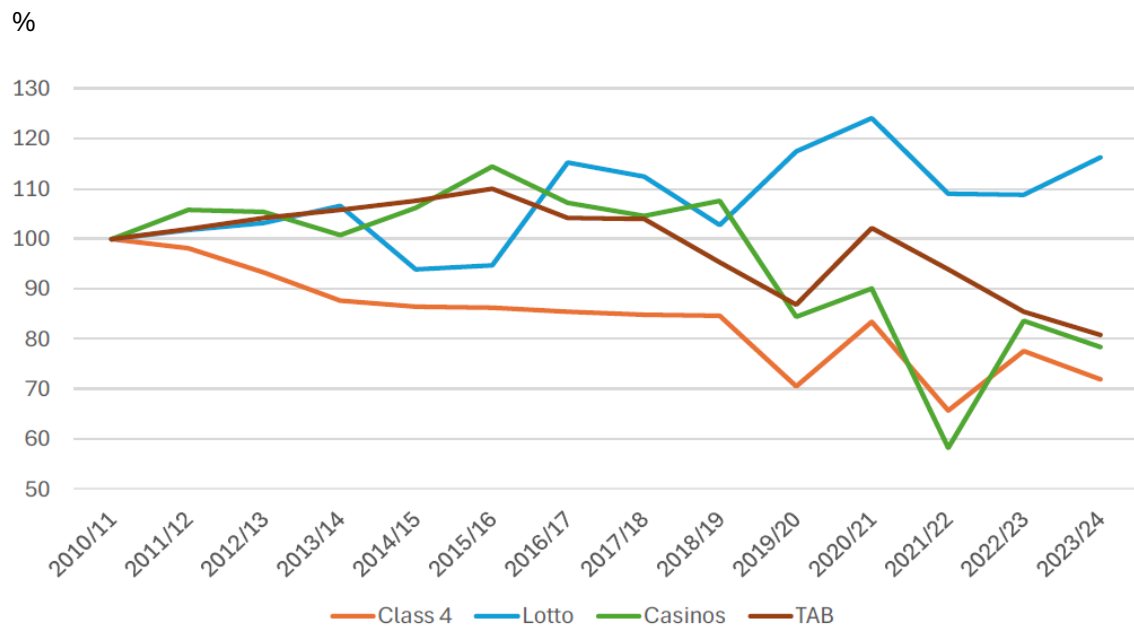
Inflation Adjusted Gambling Expenditure¹²



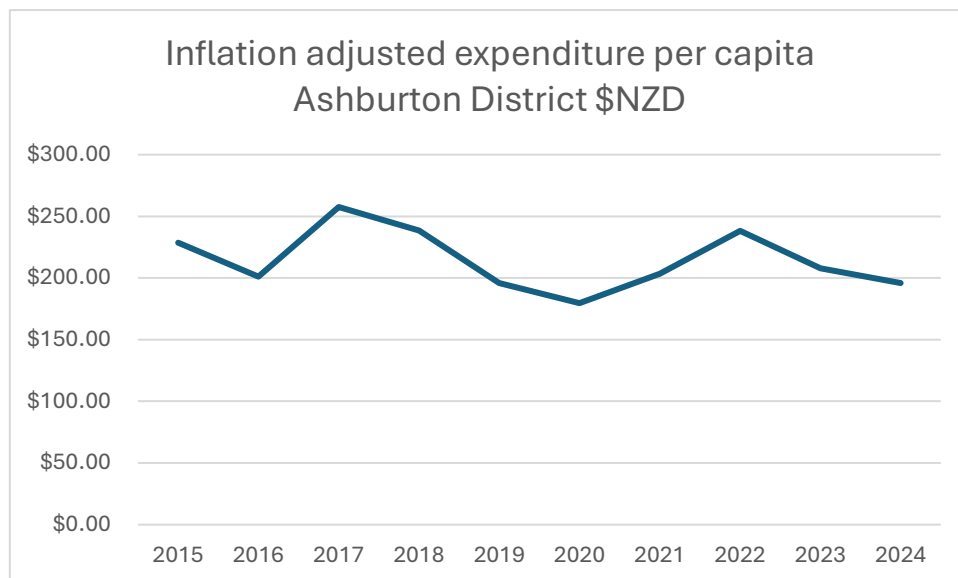
Using 2011 as a baseline, the below graph details the four gambling providers' income in percentage terms on a per capita basis. This illustrates that by 2024, Class 4 fell to 72% of its 2011 income baseline, Casinos fell to 79%, and TAB to 85%. The outlier being NZLC, whose income rose to 115% of its 2011 baseline revenue.

¹² DIA Gambling Expenditure Statistics Report

Indexed Real Gambling Expenditure Per Capita¹³



In Ashburton specifically, pokie expenditure per capita is also down from \$228.60 in 2015 to \$195.59 in 2024 (a 14% per capita drop in inflation-adjusted expenditure over ten years).¹⁴¹⁵



¹³ Source: DIA Gambling Expenditure Statistics Report

¹⁴ [Regional Economic Profile | Ashburton District | Population growth](#)

¹⁵ www.dia.govt.nz/gambling-statistics-expenditure

Benefits of Introducing a New Class 4 Relocation Policy

The Council's proposed new relocation policy is fair and essential. It allows venues to move to more modern premises which enhances their appeal and helps your hospitality sector to be more sustainable. Relocation also protects hospitality operators from opportunistic landlords who may impose excessive rent increases knowing that their tenants cannot relocate with their gaming lounges. Additionally, the policy provides a framework for venues to re-establish in cases of fire, natural disasters, public works acquisitions, or other significant challenges. Without a relocation policy, the detrimental effects of a sinking lid were one to be adopted would accelerate its effects, resulting in a loss of the valuable benefits that Class 4 gaming brings to the community.

Entertainment Value

Class 4 gambling venues offer recreational and social opportunities for residents. These hospitality establishments provide entertainment options and foster social connectivity, all whilst generating vital community funding.

Gambling Has a Net Positive Wellbeing Benefit

Gambling in all its forms contributes to New Zealand net positive well-being benefits of approximately \$2 billion annually¹⁶. This value is the sum of its entertainment value, the resulting government revenue, the problem gambling levy, and the globally unique provision of community grants that inject money into a community's not-for-profit sector and the retail and service industries that support it.

¹⁶ TDB Advisory Report 2021 Page 87

Appendix

Ministry of Health OIA request – Split of problem gamblers to moderate risk gamblers



16 April 2025

Jo Salisbury

Tēnā koe Jo

Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act) to the Ministry of Health – Manatū Hauora (the Ministry) on 19 March 2025 for information regarding the latest New Zealand Gambling Survey. Please find a response to each part of your request below:

Looking for some clarification please following the latest gambling survey release by Health NZ - Kupe - Data Explorer. Please can we have the split of problem gamblers to moderate risk gamblers as they have been combined in the same category. We've noticed that the survey has combined moderate risk gamblers and problem gamblers to get a total of 2.4% or 104,000 people. Can you please provide the split here as per previous reports?

The percentage splits for moderate-risk gamblers and high-risk (problem) gamblers are provided in the table below.

	Total	Male	Female
Problem Gambling Severity Index (PGSI)	% (95CI)	% (95CI)	% (95CI)
High-risk (problem) gambler	0.5 ^ (0.2-0.8)	0.7 ^ (0.2-1.4)	0.3 ^ (0.1-0.6)
Moderate-risk gambler	1.9 (1.5-2.5)	2.2 (1.5-3.1)	1.7 (1.1-2.6)

[^]Indicates result should be viewed as unreliable, and caution should be used when interpreting the result, as Relative Standard Error is between 0.25 and 0.5.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 12/10/2025

First name: Janette

Last name: Martin

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy Dangerous and Insanitary Buildings Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain: Need to deter gambling so less is more

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

Its those areas particularly drawn to gambling in the hopes it will improve their situation but we all know you lose more than you win. So we should protect them.

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain: we need less preferrably but definately dont need more.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain: should be less

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain:

6. Do you agree with our other proposed changes?

Yes

Please explain:

Dangerous and Insanitary Buildings Policy

1. Do you support the draft policy as presented?

Yes

Please explain:

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 16/10/2025

First name: Claire

Last name: Rushton

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain: The current venues that offer TAB services are adequate.

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

No

Please explain:

High deprivation is not limited to certain areas of Ashburton deprivation is intermingled in all areas so a rule like this would have little impact

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain:

Limiting a cap of five machines per venue is uneconomic and short sighted. By viewing gambling as simply as 'harm' can have overreaching impacts. Over 2 million per year of Pokie monies goes to directly support our community and the many organisations and individuals who benefit from receiving managed funding. These established businesses are well managed, its

a model that works and council needs to consider pokie money does do good in our community and should support that growth rather than blanket reduction on machines which would have a much wider impact and would see many children who benefit from grant funding within our district miss out. Our district is a healthy district due to the many organisations that makes our community good and grow, where are these organisations and group going to turn to - the Council??

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

No

please explain:

If a new venue is well managed and its main business is to offer services such as food and beverages they should have the option of having gambling machines but limited to 5. Is it possible to create a rule that a percentage of the money received be fed back into our community.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain:

To adopt a policy restricting venues in areas of high socioeconomic deprivation is not logical for a community the size of Ashburton as stated in the councils own proposal document.

7. Do you have any other feedback or comments regarding the policy?

I urge the council to consider the wider impact their decision will have if they adopt a less is less approach based on adopting a policy using words like deprivation. Gambling money like it or not, can do good and those who benefit are from lower socioeconomic families spread amongst our community, the very community the councils proposal is saying it is trying to protect. Reducing venues ability to put this money back into our community will not stop gambling it will just take money via online gambling outside our district and outside of NZ. So think where is the \$2million that goes back directly into this community going to come from if a conservative sensible approach is not taken. To adopt a policy around areas of high socioeconomic deprivation

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 17/10/2025

First name: Robyn

Last name: Kelland

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain: I believed the gambling facilities should be removed from the district.

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain: There should be no new venues

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain:

I believe machines should be removed from the district. But if that won't happen then a cap on numbers is appropriate

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

No

please explain : This is far too many

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain :

For those who choose to avoid the gambling facilities this may result in a pop-up venue that results in unintended exposure

6. Do you agree with our other proposed changes?

No

Please explain :

I disagree with the controlled growth model. I believe the community harm is misrepresented by the low number of only 6 people seeking help. Many do not seek help at all & families struggle to manage the harm

7. Do you have any other feedback or comments regarding the policy?

If gaming is fully removed from the community any financial benefit to community groups should not be affected, as individuals will have the money to support the causes they choose.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 22/10/2025

First name: Cale

Last name: Mcivor-Seddon

Organisation: NPHS Te Waipounamu

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

7. Do you have any other feedback or comments regarding the policy?

Please see attachment.

Attached Documents

Name
Technical Advice Gambling Venue Policy Review - Ashburton

20 October 2025

Ashburton District Council
PO Box 94
Ashburton 7740

Tēnā koutou

Technical Advice on Ashburton District Council's Gambling Venue Policy Review

1. This technical advice has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu services the South Island, including the Ashburton District.
2. NPHS recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956.
3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.
4. NPHS is focused on the achievement of equitable health outcomes. We use the Ministry of Health/Manatū Hauora's definition of equity:

In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.¹

5. This technical advice responds to some of the questions provided in the Gambling Venue Policy Review.
6. This technical advice sets out matters of interest and concern to NPHS Te Waipounamu, and information included is based on evidence about public health and equity.

¹ Ministry of Health – Manatū Hauora (2024, July 2). Achieving equity. <https://www.health.govt.nz/about-ministry/what-we-do/achieving-equity>

Gambling harm

7. Gambling is a significant public health issue that causes a wide range of harm. For example, in New Zealand gambling can cause cultural harm, financial hardship, the disruption of interpersonal relationships through conflict or breakdown², feelings of shame and guilt, and is associated with physical health problems (both morbidity and mortality), emotional/psychological distress, reduced performance at work or in education, and criminal activity, including theft from family members, businesses and communities.³
8. Typically, gambling harm presents with other health issues, such as higher levels of alcohol consumption, smoking and other-drug use.⁴ Gambling harm also has substantial links to mental health problems and psychological wellbeing, with people who gamble at high-risk levels reporting higher rates of depression and anxiety. Evidence suggests those with depression may not only use gambling to manage their symptoms but suffer depression because of their gambling.^{5,6}
9. The impacts of gambling harm are estimated to affect 11 percent of New Zealanders each year.⁷ This widespread prevalence can be attributed to the far-reaching impacts of gambling harm, which extend beyond the individual who gambles to whānau and, more broadly, communities.⁸ This is reflected in evidence which suggests that one person who gambles at harmful levels can affect at least five to ten others.⁹ In 2023/24, 381,000 adults reported that they had experienced second-hand gambling harm. Reported harms included going without essentials and experiencing household arguments.¹⁰
10. The risks and prevalence of harmful gambling are inequitably distributed, with Māori, Pacific, Asian, disabled people, and the youth most at-risk and with the highest prevalence of harmful gambling.¹¹ Māori are 3.13 times more likely than non-Māori to be moderate-risk or high-risk gamblers. Pacific people are 2.56 times more likely than non-Pacific to be moderate-risk or high-risk gamblers. Disabled people are 4.02 times more likely than non-disabled people to be moderate-risk or high-risk gamblers. Approximately 25% of young people make up moderate and high-risk gamblers, and Asian are more likely than New Zealand Europeans to experience gambling harm.¹²

² Ministry of Health (2024). Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Retrieved October 8, 2025, from [Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28: Proposals document](#)

³ Central Queensland University & Auckland University of Technology. 2017. Measuring the burden of gambling harm in New Zealand. Wellington, NZ: Ministry of Health.

⁴ Central Queensland University & Auckland University of Technology. 2017. Measuring the burden of gambling harm in New Zealand. Wellington, NZ: Ministry of Health.

⁵ Abbott, M., Bellringer, M., Garrett, N., & Mundy-Mcpherson, S. (2014a). New Zealand 2012 National Gambling Study: Gambling harm and problem gambling. Report number 2. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

⁶ Abbott, M., Bellringer, M., Vandal, A., Hodgins, D., Palmer Du Preez, K., Landon, J., Sullivan, S., & Feigin, V. (2012). Effectiveness of problem gambling brief telephone interventions: A randomised controlled trial. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

⁷ Erwin, C., Lees, K., Pacheco, G., & others. (2020). *Capping problem gambling in NZ: The effectiveness of local government policy intervention*.

⁸ Bhattacharjee, A., Dolton, P., Mosley, M., & Pabst, A. (2023). The Fiscal Costs and Benefits of Problem Gambling: Towards Better Estimates.

⁹ Productivity Commission. (1999). Australia's Gambling Industries. Summary, Report No. 10.

¹⁰ Ministry of Health (2024). Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Retrieved October 9, 2025, from [Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28: Proposals document](#)

¹¹ Ministry of Health (2024). Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Retrieved October 9, 2025, from [Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28: Proposals document](#)

¹² Ministry of Health (2024). Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Retrieved October 8, 2025, from [Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28: Proposals document](#)

11. Out of all forms of gambling, electronic gaming machines (EGMs) are the most harmful.¹³ The risk and harm associated with EGMs arises from their inherent characteristics, which encourage continuous gambling where users can reinvest their winnings to gamble further.¹⁴
12. This harm is underscored in EGMs' disproportionate representation among those who seek help services as well as their consistently large contribution to annual gambling expenditure. In 2023, 37% of gambling expenditure came from EGMs, totalling \$1037 million.¹⁵
13. It is often argued that the return of gambling revenues to the community through community grants is a net benefit of allowing EGMs and gambling venues in a district and as such, that restrictions on EGMs and venues in a council's gambling policy should be more permissive. However, this may not align with wider public sentiment. The New Zealand Gambling Survey revealed that 46.2% of respondents felt that raising money through gambling does more harm than good.¹⁶ Additionally, the findings of research support the argument that the redistribution of EGM revenue through grants does not contribute to societal progress, primarily because it relies on perpetuating a social problem in the process.¹⁷
14. Much of this funding comes from New Zealanders who are among the most deprived, while the recipients tend to be from more affluent communities. This transfer of wealth indicates that Class 4 gambling tends to magnify community disadvantage.¹⁸
15. Figure 1 below illustrates how the distribution of grants paid out by Trusts and Societies to recipients come from New Zealanders who are the more deprived and goes to New Zealanders who are less deprived.

Figure 1. Origin of Gaming Machine Profit and destination of community and sports grants by deprivation in New Zealand.¹⁹

¹³ Abbott M. (2017). *Gambling and gambling harm in New Zealand: a 28-year case study*. *International Journal of Mental Health and Addiction*. 15(6):1221–1241.

¹⁴ Ministry of Health (2024). *Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28*. Retrieved October 8, 2025, from [Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28: Proposals document](#)

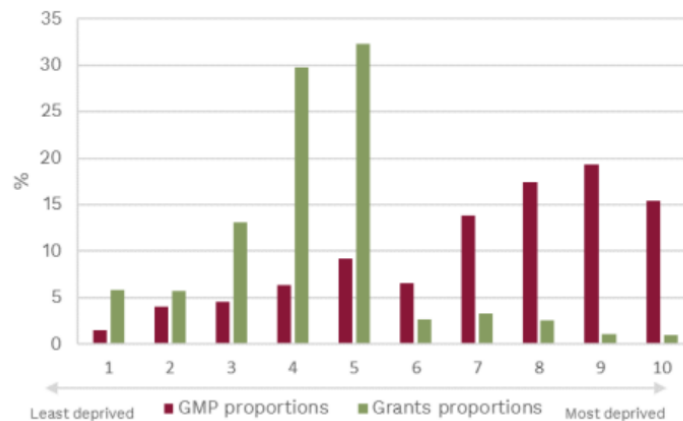
¹⁵ Te Tari Taiwhenua-Department of Internal Affairs. (n.d.). *Gambling statistics: Expenditure*. <https://www.dia.govt.nz/gambling-statistics-expenditure#annual-figures-all-gambling-activity>

¹⁶ Health New Zealand. (n.d.). *New Zealand Gambling Survey 2023/2024*. [Kupe - Data Explorer](#)

¹⁷ Malatest International. (2021). *Gambling Harm Needs Assessment 2021*.

¹⁸ Cox, M., Hurren, K., & Nana, G. (2019). A proposed approach for assessing the effects of gambling on wellbeing in New Zealand.

¹⁹ Cox, M., Hurren, K., & Nana, G. (2019). A proposed approach for assessing the effects of gambling on wellbeing in New Zealand.



General comments

16. NPHS Te Waipounamu commends Council for undertaking a revision of its Gambling Venue Policy following a 12-year period without amendment.
17. NPHS Te Waipounamu supports Council's strengthening of its Gambling Venue Policy by including a venue cap, whilst retaining a cap of five EGMs per newly established venue.
18. While a venue cap in conjunction with an EGM cap is potentially a step in the right direction, the proposed cap of twenty is well above the existing number of venues. As such, the proposed policy still facilitates an increase in venues and EGMs, and therefore, compounds the risk of gambling related harm.
19. Rather than a cap on the number of venues, NPHS Te Waipounamu recommends a sinking lid with no re-locations to strengthen gambling harm minimisation efforts.
 - A sinking lid is a strict policy intervention that Ashburton District Council could adopt to progressively reduce the number of EGMs in the district. A sinking lid prohibits the establishment of new venues and the transferring of licences. This ensures a gradual reduction in the total number of machines, which, ultimately, decreases gambling availability and related harms over time.²⁰
 - Evidence shows that sinking lid policies are extremely effective at reducing the amount of money spent on EGMs.²¹ For example, sinking lids are the only policy interventions estimated to reduce spending in contemporaneous and lagged years, highlighting their effectiveness in reducing harm over time.²² This is particularly important given that a large proportion of money spent on gambling arises from a concentrated amount of people (around 11.9% of adults in 2020).²³

²⁰ Erwin, C., Lees, K., Pacheco, G., & others. (2020). *Capping problem gambling in NZ: The effectiveness of local government policy intervention*.

²¹ Erwin, C., Lees, K., Pacheco, G., & others. (2020). *Capping problem gambling in NZ: The effectiveness of local government policy intervention*.

²² The Effectiveness of Sinking Lid Policies in Reducing Gambling Expenditure. (2021). *Journal of Gambling Studies*.

<https://doi.org/10.1007/s10899-021-10069-4>

²³ Health New Zealand. (n.d.). *New Zealand Gambling Survey 2023/2024*. [Kupe - Data Explorer](#)

20. If a sinking lid is not adopted, NPHS Te Waipounamu recommends an absolute cap of 131 EGMs in accordance with the current number of machines in the district. The introduction of an absolute cap will prevent the growth of the Ashburton District's Class 4 gambling ecosystem, serving as a preventative measure against furthering harm.
21. There is already a higher machine per capita ratio in the Ashburton District than the national average, with 35.6 EGMs per 10,000 residents in the Ashburton District in comparison to the national average of 26.3 EGMs per 10,000 residents.²⁴ As the policy proposal stands, this will only increase as venues and EGMs are established, meaning that hindering their growth is critical.
22. Ashburton District has higher rates of people seeking help services for gambling compared to the national average in 2022/23. For every 10,000 residents, 1.1 sought help locally, compared to 0.84 per 10,000 across New Zealand. In 2023, six people sought gambling help services.²⁵ While this may seem like a small number, only around 16% of affected individuals seek gambling support services.²⁶ This treatment gap can be attributed to multiple barriers, including stigmatisation and shame, a lack of awareness about services, disregarding the problem of gambling, thinking that the problem will be resolved without professional assistance, and personal reluctance.²⁷
23. NPHS Te Waipounamu supports Council's proposal to prohibit existing venues relocating to new locations that have socioeconomic deprivation scores of 8 and above.
 - Socio-economic deprivation is a significant risk factor for experiencing gambling harm. At a national level, prevalence rates are three times higher in deprived neighbourhoods when compared with those characterised by deprivation scores in the lower quintiles. This is due to higher concentrations of gambling venues and EGMs in deprived areas.^{28, 29}
 - In its consultation, Council notes that a relocation clause has been introduced to prevent Class 4 venues from moving into areas with high deprivation. However, the geographically compact nature of townships in the district means that current venue location, regardless of deprivation area, does not significantly reduce accessibility for those most at risk of gambling harm.
24. NPHS Te Waipounamu recommends that Council prohibits relocation under any circumstances to align with our sinking lid recommendation.

²⁴Ashburton District Council. (2025). *2025 social assessment report*. https://hdp-au-prod-app-adc-ourplace-files.s3.ap-southeast-2.amazonaws.com/1017/5814/1020/2025_Social_Assessment_Report_Final.pdf

²⁵Ashburton District Council, (2025). *Gambling and dangerous building policy: Statement of proposal 2025*. https://hdp-au-prod-app-adc-ourplace-files.s3.ap-southeast-2.amazonaws.com/7917/5885/1579/WEB-Gambling_and_Dangerous_Building_Policy_Statement_of_Proposal_2025.pdf

²⁶Ministry of Health. (2019). *Strategy to Prevent and Minimise Gambling Harm 2019/20 to 2021/22*. Retrieved October 10, 2025, from [Strategy to prevent and minimise gambling harm 2019-20 to 2021-22](#)

²⁷Wieczorek, Ł., & Dąbrowska, K. (2018). What makes people with gambling disorder undergo treatment? Patient and professional perspectives. *Nordisk Alkohol- & Narkotikatidskrift : NAT*, 35(3), 196–214. <https://doi.org/10.1177/1455072518772397>

²⁸Pearce, J., Mason, K., Hiscock, R., & Day, P. (2008). A national study of neighbourhood access to gambling opportunities and individual gambling behaviour. *Journal of Epidemiology and Community Health* (1979-), 62(10), 862–868.

²⁹Bellringer, M. E., Janicot, S., & Ikeda, T. (2024). Changes in some health and lifestyle behaviours are significantly associated with changes in gambling behaviours: Findings from a longitudinal New Zealand population study. *Addictive Behaviors*, 149.

25. NPHS Te Waipounamu recommends that Council adopts a policy prohibiting the merging of Class 4 Clubs as this could otherwise have the effect of increasing the number of EGMs per venue above Council's existing cap of five.
26. NPHS Te Waipounamu recommends that Council maintain the status quo regarding stand-alone TAB venues in the district (i.e. there are none) by implementing a prohibition on their establishment.³⁰ The legislation does not require Council to make provision for the stand-alone TAB venues, only to have a policy with regard to them. A policy prohibiting their establishment would mitigate any potential for growing the district's gambling landscape.
- Gambling in New Zealand has undergone significant changes in recent years, particularly with the rise of online platforms. This trend has amplified the risks associated with gambling harm through increased accessibility and convenience.³¹
 - Given this trend and its subsequent strengthening of the broader gambling ecosystem, establishing stand-alone TABs may further reinforce the normalisation of gambling in the district, compounding its impact and the harm experienced through increased visibility.

Ngā mihi,



Vince Barry
Regional Director
Public Health Service
Te Waipounamu Region



Dr Cheryl Brunon
Medical Officer of Health National
National Public Health Service
Te Waipounamu Region

³¹Mark, D., & Howard, E. (2024). *The Impact of Online Gambling on Mental Health in New Zealand: A Comparative Study*. International Journal of Scientific Research and Management.

Contact details

Cale McIvor-Seddon
NPHS Te Waipounamu

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 23/10/2025

First name: S

Last name: Carr

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain:

I think this should not have a visual presence in our community which would encourage or influence new gamblers or our young. people can already access gambling online or via phone. Keep it to this. I think a venue will increase more gamblers

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

All areas in our town and district have people who experience deprivation, restricting the areas of allowing gambling venues will not change anything, people will go to where the venues are.

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain:

I agree but would like to not see any new gambling venues in our area. existing venues should have a timeframe to adhere to

the limit of five machines also.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain: I think it should be less than 20 venues. I feel this cap is too high. 10 max

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain: No, I feel they should be disestablished altogether.

6. Do you agree with our other proposed changes?

Yes

Please explain:

7. Do you have any other feedback or comments regarding the policy?

If new venues are established, ask the people of the area if this is what they want. Limit 1 venue to each area

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 23/10/2025

First name: Hilary

Last name: Arnold

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain: Any gambling venue poses a temptation to those least able to resist and afford it

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain: Help to mitigate the risk to the vulnerable In the community

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain: The more restrictions the better

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain: As per previous question

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain: I'd like it to be as hard as possible for owners of gambling machines to profit from others

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 23/10/2025

First name: Nikki

Last name: Rogers

Organisation: Hospitality New Zealand

Would you like to present your submission in person at a hearing?

Yes

Please indicate if you want to present at the hearing in person or virtually:

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

Yes

Please explain:

Hospitality New Zealand represents nine of the twelve venues in the Ashburton District that operate Class 4 gaming, including five venues with TAB facilities. As part of this review of the Ashburton Gambling Venue Policy, feedback has been sought from these member venues to inform this submission. Stand-alone TAB Venues We support the current direction of the Gambling Venue Policy regarding stand-alone TAB venues. There is general agreement that allowing them is acceptable; however, it has been noted that TAB is not currently seeking to establish any new stand-alone venues. Based on this information, maintaining the current policy appears appropriate and aligned with TAB's stated intentions.

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

Location Controls and High Deprivation Areas There is general support for the proposal to introduce an additional location control that would prohibit new gambling venues from establishing in, or existing venues relocating to, high deprivation areas within the district. Submitters agreed with this approach, recognising the need to limit gambling harm in more vulnerable

communities. One viewpoint suggested that while restricting new venues is important, some flexibility may be needed for existing businesses in low deprivation areas that may need to relocate, as long as this does not increase risk. Overall, the feedback supports the introduction of this control as a positive step towards reducing potential social harm.

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain:

Machine Cap for New Venues Feedback on the proposal to retain a cap of five gaming machines for any new venues shows mixed views. Some support the five-machine limit, stating it is fair and appropriate, and not beneficial for new venues to operate with more. Others believe that five machines is too restrictive for a viable gaming room, suggesting a minimum of nine machines is more realistic to create a suitable entertainment environment and support operational viability. Concerns were also raised that gambling trusts may be unlikely to support new venues with only five machines. This feedback suggests a need to balance harm minimisation with the practical considerations of venue viability when determining the appropriate machine cap.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain:

District-wide Venue Cap There is clear support for the proposal to introduce a district-wide cap of 20 gambling venues. Feedback indicates agreement that this number is appropriate, as it allows for potential growth while still maintaining reasonable control over the total number of venues operating within the district. It was noted that a cap of 20 provides capacity for a limited number of new venues without encouraging significant expansion, supporting a balanced and responsible approach to gambling management.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain:

Relocation of Existing Venues There is unanimous support for the proposal to allow the relocation of existing gambling venues under certain circumstances. Feedback highlights that having the option to relocate is important for addressing unexpected situations or business-related reasons, such as lease issues or redevelopment. Allowing relocations provides flexibility for venue operators while ensuring continuity of business, provided the moves comply with overall policy objectives and location controls.

6. Do you agree with our other proposed changes?

Yes

Please explain:

7. Do you have any other feedback or comments regarding the policy?

Conclusion Overall, feedback from Hospitality New Zealand's member venues indicates general support for the direction of the Ashburton Gambling Venue Policy. The proposed measures, particularly the introduction of location controls for high deprivation areas, the district-wide

venue cap of 20, and the ability for existing venues to relocate under certain circumstances are viewed as balanced and practical steps that support responsible gambling management. While there are mixed views on the five-machine cap for new venues, the feedback highlights the need to balance harm minimisation objectives with the commercial viability of hospitality businesses. Maintaining the current approach to stand-alone TAB venues is also supported, as it aligns with TAB's operational intentions. Hospitality New Zealand appreciates the opportunity to provide input on this policy review and supports a framework that continues to promote both community wellbeing and the sustainable operation of local hospitality venues. We would appreciate the opportunity to talk to our submission. Please do not hesitate to contact us if you have any further questions.

Attached Documents

Name
Ashburton Gambling Policy Review - 23 October 2025



23 October 2025

Ashburton District Council
Via online submission

RE: Gambling Venue Policy Review 2025

Tēnā koe,

Hospitality New Zealand ("Hospitality NZ") is a not-for-profit organisation representing approximately 2,500 hospitality businesses across Aotearoa, including cafés, restaurants, bars, nightclubs, commercial accommodation providers, country hotels, and off-licences. We champion the hospitality industry by serving our members and their communities, advocating for policies that recognise the sector's significant contribution to New Zealand's economy and social fabric. Our goal is to ensure a thriving, sustainable hospitality environment that attracts talent, supports local economies, and delivers long-term community benefit. With over 120 years of history representing and supporting the hospitality and tourism sector, we are pleased to provide our submission on the **Ashburton District Council Gambling Venue Policy Review 2025**.

Introduction

Hospitality New Zealand represents nine of the twelve venues in the Ashburton District that operate Class 4 gaming, including five venues with TAB facilities. As part of this review of the Ashburton Gambling Venue Policy, feedback has been sought from these member venues to inform this submission.

Stand-alone TAB Venues



We support the current direction of the Gambling Venue Policy regarding stand-alone TAB venues. There is general agreement that allowing them is acceptable; however, it has been noted that TAB is not currently seeking to establish any new stand-alone venues. Based on this information, maintaining the current policy appears appropriate and aligned with TAB's stated intentions.

Location Controls and High Deprivation Areas

There is general support for the proposal to introduce an additional location control that would prohibit new gambling venues from establishing in, or existing venues relocating to, high deprivation areas within the district. Submitters agreed with this approach, recognising the need to limit gambling harm in more vulnerable communities. One viewpoint suggested that while restricting new venues is important, some flexibility may be needed for existing businesses in low deprivation areas that may need to relocate, as long as this does not increase risk. Overall, the feedback supports the introduction of this control as a positive step towards reducing potential social harm.

Machine Cap for New Venues

Feedback on the proposal to retain a cap of five gaming machines for any new venues shows mixed views. Some support the five-machine limit, stating it is fair and appropriate, and not beneficial for new venues to operate with more. Others believe that five machines is too restrictive for a viable gaming room, suggesting a minimum of nine machines is more realistic to create a suitable entertainment environment and support operational viability. Concerns were also raised that gambling trusts may be unlikely to support new venues with only five machines. This feedback suggests a need to balance harm minimisation with the practical considerations of venue viability when determining the appropriate machine cap.

District-wide Venue Cap



There is clear support for the proposal to introduce a district-wide cap of 20 gambling venues. Feedback indicates agreement that this number is appropriate, as it allows for potential growth while still maintaining reasonable control over the total number of venues operating within the district. It was noted that a cap of 20 provides capacity for a limited number of new venues without encouraging significant expansion, supporting a balanced and responsible approach to gambling management.

Relocation of Existing Venues

There is unanimous support for the proposal to allow the relocation of existing gambling venues under certain circumstances. Feedback highlights that having the option to relocate is important for addressing unexpected situations or business-related reasons, such as lease issues or redevelopment. Allowing relocations provides flexibility for venue operators while ensuring continuity of business, provided the moves comply with overall policy objectives and location controls.

Conclusion

Overall, feedback from Hospitality New Zealand's member venues indicates general support for the direction of the Ashburton Gambling Venue Policy. The proposed measures—particularly the introduction of location controls for high deprivation areas, the district-wide venue cap of 20, and the ability for existing venues to relocate under certain circumstances—are viewed as balanced and practical steps that support responsible gambling management.

While there are mixed views on the five-machine cap for new venues, the feedback highlights the need to balance harm minimisation objectives with the commercial viability of hospitality businesses. Maintaining the current approach to stand-alone TAB venues is also supported, as it aligns with TAB's operational intentions.



Hospitality New Zealand appreciates the opportunity to provide input on this policy review and supports a framework that continues to promote both community wellbeing and the sustainable operation of local hospitality venues.

We would appreciate the opportunity to talk to our submission.

Please do not hesitate to contact us if you have any further questions.

Ngā mihi nui,

Nikki Rogers
Regional Manager – Central South Island
Hospitality New Zealand

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 24/10/2025

First name: Niall

Last name: Millar

Organisation: TAB NZ

Would you like to present your submission in person at a hearing?

Yes

Please indicate if you want to present at the hearing in person or virtually: Virtually

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

Yes

Please explain:

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain: Extend to apply to stand-alone TAB venues.

Attached Documents

Name
TAB NZ Submission to Ashburton District Council



24TH October 2025

Ashburton District Council

By email: submissions@adc.govt.nz

TAB NZ Submission to Ashburton District Council: Gambling Venue Policy

Introduction

1. TAB New Zealand ("TAB NZ") welcomes the opportunity to submit to the Ashburton District Council (the Council) on their Gambling Venue Policy.
2. TAB NZ is a statutory body established under the Racing Industry Act 2020, and is the sole entity authorised to conduct racing and sports wagering in New Zealand. In 2023 TAB NZ and Entain Australia & New Zealand entered a strategic partnership, which delegates the functions to conduct wagering and broadcasting activities to Entain New Zealand Limited ("Entain").
3. The partnership has ensured customers of the TAB and betcha brands are offered world class products with extensive harm minimisation tools – including facial recognition in venues throughout the country.

Submission on Council Proposals

4. The Council proposes introducing an additional location requirement, prohibiting new venues being established in areas of high deprivation (decile 8 or higher). TAB NZ does not oppose this change.
5. The Council is also proposing to update the relocation policy for Class 4 venues to permit existing venues to relocate to an alternative site while retaining the same consent conditions for specific reasons. TAB NZ supports this change and further recommends extending the relocation policy relating to Class 4 venues to also be applied to TAB venues.
6. TAB NZ supports the Council's proposal over more restrictive policies such as the introduction of a sinking lid, or lowering the venue cap from current numbers. Such restrictive policies could prevent TAB NZ from establishing a new venue to service TAB customers - which may be necessary as a result of circumstances that are beyond its control, such as:
 - A TAB venue closing from a natural event or lease reasons.
 - Seismic issues

- A breach of the wagering agreement between TAB NZ and the venue.
7. Venue relocation is also a harm minimisation tool. Allowing venue relocation creates positive impacts by enabling venues to move out of residential areas to more suitable areas, such as:
- From a high deprivation area to a lower deprivation area.
 - From an unsuitable site such as a residential area or an area close to a sensitive site to a more suitable area such as a central business district.
 - To new, more modern & vibrant refurbished premises.
 - Out of earthquake-prone buildings.
 - Out of large blocks of land that could be used for other purposes, such as new high-density affordable housing or other business facilities

Community Distributions

8. From September 2024, TAB NZ commenced trading its class 4 gambling operation under the banner of the Bobby Foundation. Bobby was the nickname given to perhaps New Zealand's most famous racehorse, Phar Lap. All grants and funds distributed by TAB NZ are done through the Bobby Foundation – a fun, youthful, distinctive kiwi brand with the ethos of 'Backing Kiwi Legends'.
9. TAB NZ's commitment to community benefit is demonstrated through its Class 4 operation. The Bobby Foundation is responsible for distributing grants to support both the racing industry and grassroots sports organisations, ensuring that proceeds from gambling are reinvested into local communities. Every wager placed through TAB or its digital brand, betcha, generates returns that are allocated to the racing industry, National Sport Organisations (NSOs), or Sport NZ. These contributions are set out in statute under the Racing Industry Act 2020 and the Gambling Act 2003.
10. In the 24 months leading to 31 July 2025, TAB NZ returned a total of \$897k to amateur sporting organisations within the wider Canterbury region. Over \$2m was also contributed to racing funding in the wider Canterbury region – including over \$200k specifically towards Ashburton Raceway improvements.
11. These contributions are designed to sustain the sporting ecosystem across New Zealand. This model ensures that gambling revenue is channelled back into the community, supporting positive social outcomes, and reinforcing TAB NZ's role as a responsible operator.

TAB Venues and Harm Minimisation

12. Under its statutory objectives, TAB NZ must maximise returns to racing and sports within New Zealand, subject to ensuring that risks of problem gambling and underage gambling are minimised.
13. TAB NZ is committed to ensure that gambling is conducted safely. All TAB NZ venues are designed and monitored to minimise harm caused by gambling. \$4m has been committed to rolling out facial recognition technology in TAB retail stores around the country, staff undergo comprehensive harm minimisation training, and gambling activity is constantly monitored.
14. TAB NZ also contributes to the Problem Gambling Levy. This fund of circa \$24m per annum is used by the Ministry of Health to provide support for problem gambling and raising awareness for safer gambling practices.

Conclusion

15. TAB NZ's submission sets out our position on the proposed changes in the Council Venue Policy including strongly recommending the ability to relocate (as per Class 4 venues) further applies to TAB venues, to ensure any future TAB venue potentially established in the District is permitted the same rights in any circumstances that may be out of their control.
16. TAB NZ aims to create a gambling environment that is safe, responsible, and supportive for all individuals. These efforts reflect TAB NZ's commitment to minimising the potential harms associated with gambling while providing a viable option for monitoring gambling activities within an area.
17. If possible, TAB NZ would like to speak to the Council on its submission via an online video conference.
18. TAB NZ appreciates the opportunity to submit on this policy.

Niall Miller

General Manager, Gaming

TAB NZ

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 24/10/2025

First name: Tony

Last name: Goldfinch

Organisation: The Lion Foundation

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain:

TLF considers that the retention of the cap of 5 EGMs for a new venue could be increased to 9 EGMS per new venue - to ensure a strong flow of continued community funding. This is also in line with statutory limits prescribed by the Gambling Act. There are significant measures that are already in place to minimise the harm from gaming machines. These measures have been enhanced with the introduction of new gambling harm regulations in December 2023 and must be applied regardless of the number of operating EGMS.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain: TLF supports the introduction of the proposed 20 venue cap within the district.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain: TLF supports the adoption of the proposed relocation provisions.

7. Do you have any other feedback or comments regarding the policy?

See full submission attached.

Attached Documents

Name
Lions Foundation - Ashburton Council Gambling Policy Review Submission October 2025 



Submission to Ashburton District Council:
Proposed Class 4 Gambling Venues Policy

October 2025

1. INTRODUCTION

We are pleased to submit The Lion Foundation's (TLF) response to the Ashburton District Council's Gambling Policy Review.

The Lion Foundation is one of New Zealand's largest gaming machine societies by venue number, machine number and money returned to the community through grants.

Formed in 1985, we have distributed over \$1 billion in grants to local, regional and national community causes since our inception.

The New Zealand community funding model is one of the most efficient in the world and we support any review that allows consideration to be given to the **total impact** that gambling has on and within our communities. In New Zealand, gaming is not operated for commercial gain, but rather for community gain.

2. SUMMARY OF THE LION FOUNDATION'S POSITION – Class 4 Gambling Venues

The Lion Foundation supports the adoption of the Draft Gambling Venue Policy 2025. TLF also acknowledges the extensive community engagement prior to the release of the Draft Policy.

3. ABOUT THE LION FOUNDATION (TLF)

The Lion Foundations' purpose, simply put, is to effectively and efficiently sustain community funding. Our aim is to protect and help people build better communities in a way that is safe, ethical, transparent, and consistent with the intent of the Gambling Act.

Our focus is on compliance and the reduction of gambling harm. The Lion Foundation is not here to grow or promote gambling.

We currently operate Electronic Gaming Machines (EGMs) at four venues in the district: -

- **Devon Hotel** - 18 EGMs
- **Hotel Ashburton** -18 EGMs
- **Railway Rakaia Tavern** - 6 EGMs
- **The Brown Pub** - 9 EGMs
- **Tinwald Tavern** - 18 EGMs

The Venue Operators, Managers and staff are members of the local community and have the community's interest at the heart of the business.

Venue Operators receive a limited /capped payment – defined by the Gambling Act 2003 and related Regulations, more specifically the Gambling (Venue Payments) Regulations 2016 ¹. The venue payment is a fair and equitable payment designed to compensate the Venue Operators for the operational costs incurred in operating the EGMs for the Class 4 Society.

¹ <https://www.legislation.govt.nz/regulation/public/2016/0191/latest/DLM6917617.html>

4. GAMING MACHINE FUNDING

TLF aims to return at least 90% of funds back to the community of origin (where the funds were generated), with the remaining 10% of funds being returned to organisations providing a national benefit to all New Zealanders.

In Ashburton, the appointment of the Trustees of the Braided Rivers Community Trust (BRCT) as a grant committee ensures that local community organisations benefit from grant funding. Being a committee constituted of local residents, the Trustees of BRCT are extremely well placed to ensure that grant funding lands where it is most needed.

We are a broad based, inclusive funder - that is, we fund a wide range of organisations across all community groups. Our grants are committed to the following community sectors:

- Sport
- Community, Arts & Culture
- Health
- Education

A full list of grants distributed by TLF in partnership with BRCT to the community from funds generated by the gambling operation in the district for the period 1 April 2024 - 30 September 2025 is attached hereto Schedule 1.

Our ability to distribute funding to the local community is **entirely dependent** on TLF receiving completed and eligible funding applications. TLF acknowledges that a vast majority of volunteer-based community organisations do not always have the ability to navigate the process that is involved in applying for Class 4 funding. Over the past 24 – 36 months and to ensure that all community organisations have a fair opportunity to access community funding, TLF has launched a series of educational webinars. More recently interactive Q& A sessions have been hosted. The webinars provide valuable “*how to information*” and are proving to be a success. These educational initiatives supplement the ongoing work that TLF’s Grants Advisors undertake within the community.

As stated previously, approximately 10% of all funds generated from all venues is allocated to national organisations, which include (not an exhaustive list):

Life Education Trust	Royal NZ Ballet	Graeme Dingle Foundation
Holocaust Centre of NZ	NZ Football	Surf Lifesaving NZ Inc
Special Olympics NZ	Netball NZ	Basketball NZ
Endometriosis N Z	Assistance Dogs NZ	Royal NZ Plunket Soc Inc
Barnardo's N Z	NZ Spinal Trust	NZ Rugby League Inc

The Gambling Act 2003 seeks to balance the potential harm from gambling as well as the benefits of using gaming machines as a mechanism for community fundraising. The proposed Draft Policy is balances the potential harm from gambling whilst preserving access to community funding.

5. POLICY DISCUSSION – Retention of Capped Policy

- TLF supports the introduction of the proposed 20 venue cap within the district.
- TLF supports the adoption of the proposed relocation provisions.
- TLF considers that the retention of the cap of 5 EGMs for a new venue could be increased to 9 EGMs per new venue - to ensure a strong flow of continued community funding. This is also in line with statutory limits prescribed by the Gambling Act. There are significant measures that are already in place to minimise the harm from gaming machines. These measures have been enhanced with the introduction of new gambling harm regulations in December 2023 and must be applied regardless of the number of operating EGMs.
- Furthermore, available research has concluded that gambling is a popular form of entertainment that people find enjoyable.
 - Players mostly realise that they are paying for a leisure experience. They are not expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.²
 - Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.³
- The Class 4 sector is highly regulated - by way of example (not an exhaustive list):
 - There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
 - There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won.
 - Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
 - ATMs are excluded from all gaming rooms.
 - All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
 - All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling
 - All gaming venues have a harm minimisation policy.
 - All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
 - Gaming room sweeps must be conducted no less than three times per hour by the fully trained venue staff.
 - It is not permissible for a player to play two gaming machines at once.

² Parke, J. (2015). Gambling, leisure and pleasure: Exploring psychosocial need satisfaction in gambling. Presentation at the KPMG eGaming summit. <https://assets.kpmg/content/dam/kpmg/pdf/2016/07/im-esummit-report-2015.pdf>.

³ Suits, D. (1979). The Elasticity of Demand for Gambling. The Quarterly Journal of Economics, 93(1), 155–162. <https://doi.org/10.2307/1882605>

- The technical design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).

6. HARM MINIMISATION

The Lion Foundation is committed to preventing and minimising harm from gambling, including problem gambling, whilst facilitating a responsible and legal form of recreational gambling.

We are committed to creating safe gambling environments in all our venues, and minimising the harm caused by problem gambling.

At TLF we play a considerable part in the prevention and minimisation of harm at the venues – *a fence at the top of the cliff* approach. We ensure our Venue Operators and their gaming staff are fully trained in all relevant areas of harm minimisation. We have released an online training system which has been developed by industry professionals. Input has been sought and received from all walks of life, including employees of the Salvation Army Oasis National Office. In December 2024 the Department of Internal Affairs approved TLF's Harm Minimisation Policy (we actually refer to it as TLF's Duty of Care Policy) which incorporates all aspects of the re-written Gambling (Harm Prevention and Minimisation) Regulations 2004.

In addition to our online programme, all staff involved in gaming at The Lion Foundation venues undertake frequent face to face training courses (including refresher courses) run by experienced TLF personnel. All TLF personnel have a wealth of experience in the gaming and hospitality sectors. Training focuses on the prevention and minimisation of incidences of problem gambling – how to observe and identify problem gamblers, how to support problem gamblers and how to ensure that harm is minimised. In addition to the ongoing training, our industry trained staff are constantly in contact with the venue staff and are available to assist with a variety of matters at a moment's notice – either in person or telephonically.

Our Account Managers are physically present in the venues on a weekly basis – ensuring compliance standards are met.

The Lion Foundation offers a range of harm minimisation material to the gambler in the venue – including, but not limited to, wallet cards with information for potential problem gamblers, signage in and around gaming rooms from the Health Promotion Agency, etc. Venue staff interaction and supervision and observation of patrons is also key to the minimisation of harm.

We support the introduction of new harm minimisation measures, provided they are based on good evidence that they will have a positive impact on the reduction in harm caused by gambling.

Apart from TLF's own efforts, an excellent, well-funded problem gambling treatment service exists. The problem gambling helpline is available 24 hours a day, 365 days per year. Free, confidential help is available in 40 different languages. Free face-to-face counselling is also available, and specialist

counselling is available for Māori, Pasifika and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available(help@pgfnz.org.nz).

8. CONCLUSION

It is our submission that the Council's proposed Policy optimises the balance between reasonable controls over the incidence of problem gambling against the generation of funds for the community from legitimate gambling.

Finally, we are not here to grow gambling; we believe though that pragmatic use of funds generated by this legalised form of entertainment make a hugely positive contribution to community life across New Zealand.

Application Outcome 1 January 2025 - 30 September 2025

App Ref	Org Trading Name	App Approval Date	App Benefiting TLA	Total Sum of Approval Amount
GA241202-027B	Digital Waitaha Charitable Trust	05/02/2025	063 - Ashburton District	\$10,000.00
GA241204-097E	Ashburton Swim Team Incorporated	05/02/2025	063 - Ashburton District	\$5,000.00
GA241205-106B	The Caninspire Charitable Trust	05/02/2025	063 - Ashburton District	\$6,000.00
GA241209-1549	Hospice Mid Canterbury Trust	05/02/2025	063 - Ashburton District	\$10,000.00
GA241210-196E	Mayfield Agricultural and Pastoral Association	05/02/2025	063 - Ashburton District	\$25,000.00
GA241210-1988	Hakatere Multi Cultural Council Incorporated	25/03/2025	063 - Ashburton District	\$15,000.00
GA241213-2296	Mid Canterbury Netball Incorporated	05/02/2025	063 - Ashburton District	\$75,000.00
GA241216-2512	Hakatere Youth Sports Club Incorporated	05/02/2025	063 - Ashburton District	\$20,000.00
GA241216-272D	Filipino Dairy Workers In New Zealand Incorporated	05/02/2025	063 - Ashburton District	\$3,000.00
GA241217-2861	Social Service Council of the Diocese of Christchurch	05/02/2025	063 - Ashburton District	\$9,000.00
GA241218-2960	The Ashburton College Board of Trustees	05/02/2025	063 - Ashburton District	\$70,000.00
GA241219-3150	Mid Canterbury Children's Trust	05/02/2025	063 - Ashburton District	\$9,000.00
GA241229-3586	The Peel Forest Outdoor Pursuits Charitable Trust	05/02/2025	063 - Ashburton District	\$10,000.00
GA250106-3899	Mid Canterbury Rugby Union Incorporated	25/03/2025	063 - Ashburton District	\$95,000.00
GA250107-398F	Kai For Kids Charitable Trust	05/02/2025	063 - Ashburton District	\$30,000.00
GA250110-4207	Basketball Mid-Canterbury Incorporated	05/02/2025	063 - Ashburton District	\$35,000.00
GA250113-433D	RNZ Plunket Trust - Mid Canterbury	05/02/2025	063 - Ashburton District	\$25,000.00
GA250114-4477	Ashburton Performing Arts Theatre Trust	25/03/2025	063 - Ashburton District	\$40,000.00
GA250114-458E	Water Ski Lake Hood Incorporated	05/02/2025	063 - Ashburton District	\$5,000.00
GA250122-5459	Cancer Society of New Zealand Canterbury-West Coast Division Incorporated	25/03/2025	063 - Ashburton District	\$75,000.00
GA250129-6456	Mt Somers Rugby Football Club Incorporated	25/03/2025	063 - Ashburton District	\$2,598.00
GA250130-6517	Tinwald Cycling Club Incorporated	25/03/2025	063 - Ashburton District	\$12,000.00
GA250209-781A	Ashburton Pistol Club Incorporated	25/03/2025	063 - Ashburton District	\$10,000.00
GA250210-7873	Canterbury West Coast Sports Trust	25/03/2025	063 - Ashburton District	\$83,260.00
GA250211-8081	The Big Little Theatre Company Incorporated	25/03/2025	063 - Ashburton District	\$4,000.00
GA250214-8527	Ashburton Safer Community Council Trust Board	25/03/2025	063 - Ashburton District	\$25,000.00
GA250224-982C	Methven Football Club Incorporated	27/05/2025	063 - Ashburton District	\$7,500.00

GA250313-218B	Rotary Club of Ashburton Plains Charitable Trust	26/05/2025	063 - Ashburton District	\$8,985.00
GA250320-3352	Waireka Croquet Club Incorporated	26/05/2025	063 - Ashburton District	\$7,500.00
GA250324-3741	Ashburton Operatic Society Incorporated	26/05/2025	063 - Ashburton District	\$18,000.00
GA250331-468A	Seniornet Ashburton Incorporated	26/05/2025	063 - Ashburton District	\$2,300.00
GA250401-5027	Age Concern, Ashburton (Incorporated)	28/07/2025	063 - Ashburton District	\$25,000.00
GA250408-590E	Mid Canterbury Choir Charitable Trust	26/05/2025	063 - Ashburton District	\$10,000.00
GA250414-6765	Presbyterian Support (Upper South Island)	26/05/2025	063 - Ashburton District	\$1,895.00
GA250415-682F	The Mount Hutt College Board	26/05/2025	063 - Ashburton District	\$55,000.00
GA250422-7486	Ashburton Art Gallery Incorporated	26/05/2025	063 - Ashburton District	\$7,000.00
GA250422-7495	Search and Rescue avalanche dogs inc	26/05/2025	063 - Ashburton District	\$3,800.00
GA250501-8538	Ashburton Youth Cafe Charitable Trust	26/05/2025	063 - Ashburton District	\$18,000.00
GA250501-8568	Ashburton Youth Health Trust Te Wairua O Rangatahi	28/07/2025	063 - Ashburton District	\$7,500.00
GA250501-8589	Young Men's Christian Association of South and Mid Canterbury Incorporated	28/07/2025	063 - Ashburton District	\$8,000.00
GA250505-8982	Ashburton Seniors Centre Trust	28/07/2025	063 - Ashburton District	\$25,000.00
GA250506-9099	Mid Canterbury Group Riding For the Disabled Association Incorporated	26/05/2025	063 - Ashburton District	\$34,000.00
GA250519-076C	Rakaia Golf Club Incorporated	28/07/2025	063 - Ashburton District	\$28,000.00
GA250603-2556	Mid Canterbury Community Vehicle Trust	28/07/2025	063 - Ashburton District	\$16,000.00
GA250606-3091	Mid Canterbury Dog Training Club Incorporated	28/07/2025	063 - Ashburton District	\$2,000.00
GA250609-336F	Midcanterbury Hockey Incorporated	28/07/2025	063 - Ashburton District	\$55,000.00
GA250612-3869	Ashburton District Neighbourhood Support Incorporated	29/09/2025	063 - Ashburton District	\$15,000.00
GA250616-4190	Ashburton Community Garden	28/07/2025	063 - Ashburton District	\$2,338.00
GA250621-4885	Ashburton Celtic Rugby Football Club Incorporated	28/07/2025	063 - Ashburton District	\$55,000.00
GA250623-5060	Birthingright Canterbury Trust	28/07/2025	063 - Ashburton District	\$25,104.00
GA250627-5863	Mead-Te Pirita Gun Club Incorporated	28/07/2025	063 - Ashburton District	\$14,000.00
GA250719-874C	Methven Golf Club Incorporated	29/09/2025	063 - Ashburton District	\$15,000.00
GA250724-9263	Ashburton Golf Club Incorporated	29/09/2025	063 - Ashburton District	\$6,500.00
GA250728-9879	Tennis Mid Canterbury Sub Association Incorporated	29/09/2025	063 - Ashburton District	\$45,000.00
GA250811-2070	Mayfield Community Swimming Pool Incorporated	29/09/2025	063 - Ashburton District	\$60,000.00
GA250812-2368	Ashburton Area Jumping and Show Hunter Group	29/09/2025	063 - Ashburton District	\$14,000.00
GA250813-252B	Blue Brothers	29/09/2025	063 - Ashburton District	\$2,940.00

GA250816-299D	Ashburton Sailing Club Incorporated	29/09/2025	063 - Ashburton District	\$7,000.00
GA250818-3115	Ashburton Toy Library Incorporated	29/09/2025	063 - Ashburton District	\$14,107.00
Grand Total				\$1,325,327.00

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 27/10/2025

First name: Raymond

Last name: Une

Organisation: MapuMaia

Would you like to present your submission in person at a hearing?

I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain:

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain:

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain:

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain:

6. Do you agree with our other proposed changes?

No

Please explain:

Attached Documents

Name
Ashburton Class 4 Gambling Policy Submission



Ashburton Gambling Venue Policy

Submission to the Ashburton District Council

October 2025

Executive Summary

Mapu Maia welcomes the opportunity to provide feedback on the review of Ashburton District Council's Class 4 Gambling (pokie machine) and TAB Venue Policy. As an organisation dedicated to preventing and reducing gambling harm, particularly among Pacific communities, we advocate for policy settings that protect vulnerable families, reduce gambling-related inequities, and prioritise community wellbeing. We do not support the proposed "controlled growth" model and instead recommend a policy that limits further expansion of gambling venues and machine numbers in the district.

Ashburton currently has higher-than-average gaming machine availability and correspondingly higher gambling intervention rates, signalling an elevated risk of gambling harm in the district. National evidence from the Ministry of Health and the Department of Internal Affairs consistently shows a clear link between gaming machine density and gambling harm, with pokies causing disproportionate harm to Māori, Pasifika, and low-income communities. Allowing further growth under a "controlled growth" approach risks increasing exposure, normalising gambling, and widening existing inequities.

Mapu Maia recommends that Ashburton District Council adopt a prevention-focused, public health policy framework that includes:

1. No increase in Class 4 venues or gaming machine numbers, rejecting controlled growth.
2. A sinking lid policy to steadily reduce machine numbers over time through natural venue closure.
3. A ban on venues and machines in high-deprivation areas or areas with high equity risk.
4. Strengthened harm-minimisation requirements for all venues, including improved staff training, proactive host responsibility, and clear accountability mechanisms.

This approach aligns with the Ministry of Health's strategy to prevent and minimise gambling harm. This will gradually reduce harm, limit community exposure, and provide the strongest protection for vulnerable whānau. A sinking lid remains the most responsible, cost-effective, and equitable pathway to safeguard community wellbeing in Ashburton.

Background

Mapu Maia is a national Pacific gambling support and public health service. We work with individuals, families, and communities experiencing gambling harm, and deliver public health programmes aimed at harm minimisation, education, and advocacy. Our frontline experience provides us with deep insight into the social, cultural and economic impacts of gambling harm, particularly where it intersects with deprivation, stress, and family obligations.

Impact of gambling on Pacific communities

To understand the impacts of gambling harm within vulnerable communities, we must acknowledge the deep layers associated with gambling and the multifaceted nature of gambling harm in these communities. According to research, Pacific communities are significantly more likely, 2.56 times more likely, to face moderate to serious gambling risks than non-Māori, non-Pacific populations (1). Gambling and its effects on our Pacific are not new; they are very well hidden. MapuMaia, the only Pacific organisation that offers support for Gambling Harm in

Aotearoa, has seen the impact of gambling within the Pacific community. Whether through clients, public events, church gatherings, or school programmes, numerous cases arise concerning gambling, especially those involving individuals affected by someone else's gambling.

Current context in Ashburton

Council's review notes that Ashburton currently has more gaming machines than the national average and a slightly higher rate of gambling-related intervention, despite no clear rise in visible harm. (2) This should be treated as a critical early warning signal, consistent with national and international public health research. Research shows that visible harm is often delayed; financial strain, family tension, behavioural changes and psychological distress typically accumulate over time and often remain hidden until they escalate into crisis. (3) By the time harm becomes formally visible in statistics, the underlying drivers, such as machine density and ease of access, are already well established, which makes intervention more complex and costly. For this reason, early indicators like venue concentration, deprivation mapping and intervention rates should be treated as predictors of future harm. A precautionary policy response is therefore warranted to minimise harm before it becomes widespread and more severe.

Key considerations

A controlled growth approach, even if gradual, will inevitably increase accessibility and exposure, and international and New Zealand evidence shows that greater machine availability leads directly to greater harm. Key considerations include:

- Gaming machines are among the most harmful forms of gambling and are strongly associated with higher addiction risk.
- The Department of Internal Affairs has identified a clear link between machine density and gambling harm.
- Ministry of Health research shows that around one in five New Zealand adults will experience gambling harm in their lifetime, either personally or through a family member. (4)
- Harm falls disproportionately on high-deprivation communities, where gaming machines are most concentrated.

For these reasons, we urge Council to reject any policy direction that enables growth and instead prioritise community wellbeing and harm reduction.

Sinking Lid Policy

The claim that sinking lid policies do not reduce gambling harm ignores how harm occurs and its wider social impact. Harm is not measured solely by money spent but by exposure and accessibility. Reducing gaming machine numbers and venues directly limits opportunities for risky gambling, particularly in high-deprivation communities where machines are concentrated. Evidence from Health New Zealand and the Ministry of Health shows that people living near more venues are far more likely to develop gambling-related problems. (5) Our communities cannot experience harm and lose money on pokie machines that are not there.

The appropriate response to the risks posed by online gambling is stronger digital regulation, not maintaining or expanding the number of pokie machines in local venues. To suggest otherwise is analogous to arguing that smoking should not be addressed because people might choose to vape instead. The responsible approach is to address both forms of gambling, while prioritising the reduction of the more harmful option in the community.

Long-term evidence shows sinking lid policies work. They reduce machine density, make gambling less visible, and prevent harm for future generations, especially when combined with education and support services. (6) Reducing pokies in vulnerable areas is a public health imperative, the most responsible and equitable approach to protecting whānau and community wellbeing.

Conclusion

International and local evidence is clear: the most effective way to reduce gambling-related harm is by restricting access to, exposure to, and the density of gaming machines. While education, treatment, and intervention remain necessary, they cannot compensate for the harms caused by increasing machine availability. For Ashburton, a proactive, prevention-focused approach that limits both venues and machine numbers is essential to safeguard whānau, protect vulnerable communities, and prevent long-term social and financial harm. Immediate action is required to ensure that the policy prioritises community wellbeing over gambling expansion.

References:

1. Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25.
2. Our place - Tōtātou Wāhi [Internet]. [cited 2025 Oct 25]. Social Impact Assessment - Key Findings | Gambling Venue Policy Review. Available from: <https://itsourplace.nz/gambling-venue-policy-review/social-impact-assessment-key-findings>
3. Browne M, Bellringer M, Greer N, Kolandai-Matchett K, Rawat V, Langham E, et al. Measuring the Burden of Gambling Harm in New Zealand.
4. Measuring gambling harm | Ministry of Health NZ [Internet]. 2025 [cited 2025 Oct 25]. Available from: <https://www.health.govt.nz/statistics-research/research/gambling-harm-research-and-evaluation/measuring-gambling-harm>
5. Microsoft Word - Final report PIF 2022 30 Sept 2024 [Internet]. [cited 2025 Oct 25]. Available from: https://garc.aut.ac.nz/__data/assets/pdf_file/0006/969369/Final-report-PIF-2022-30-Sept-2024.pdf
6. Erwin C, Pacheco G, Turcu A. The Effectiveness of Sinking Lid Policies in Reducing Gambling Expenditure. J Gambl Stud. 2022 Sept 1;38(3):1009–28.

Gambling Venue and Dangerous and Insanitary Buildings Policy Review

Submitter Details

Submission Date: 27/10/2025

First name: Indrea

Last name: Alexander

Would you like to present your submission in person at a hearing?

Yes

Please indicate if you want to present at the hearing in person or virtually: in person

Feedback

What policy are you submitting on?

Gambling Venue Policy

Gambling Venue Policy

1. Do you support the proposal to allow stand-alone TAB venues to establish in the district?

No

Please explain:

I object to provision for a stand-alone TAB venue. Council regards application as unlikely, and with TAB betting readily accessible online, I anticipate the purpose of a stand-alone TAB venue would be primarily to increase gambling, which would have attendant risk of social harm. .

2. Do you support the proposal to introduce an additional location control that prohibits new venues from establishing in, or existing venues relocating to high deprivation areas in the district?

Yes

Please explain:

I support the prohibition of venues being established in, or relocating to, the most socially deprived areas of the district. As acknowledged in research, the increased level of social harm by pokies in such areas is proportionally significant.

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

Yes

Please explain:

I support the cap of five machines as better than allowing nine machines, however I would far prefer a sinking lid that did not allow any new venues.

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

No

please explain:

I do not support the proposed district wide cap of 20 venues, and ask for a sinking lid policy that did not allow any new venues. Compared with figures at the beginning of 2025, I understand 20 venues would be an 80% increase in the number of venues from 11 to 20. As the council report noted, under this model, the total number of machines in the district could reach 230 housed across 20 venues, an increase of 70% from the 135 at the beginning of the year. Access to so many more venues and machines would be detrimental to community wellbeing, as an estimated 2 in 5 people who use pokies regularly develop an addiction, and an estimated 40% of all community funding from pokies is from problem gamblers.

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

No

Please explain:

Gambling Venue and Dangerous and Insanitary Buildings Policy Review



Submitter Details

Submission Date: 27/10/2025

First name: Fiona

Last name: Allan

Organisation: Youthtown

Would you like to present your submission in person at a hearing?

Yes

Please indicate if you want to present at the hearing in person or virtually: Virtually

Feedback

What policy are you submitting on?

Gambling Venue Policy

3. Do you support the proposal to retain a cap of five machines for any new venues being established in the district?

No

Please explain:

4. Do you support the proposal to introduce a district-wide cap of 20 venues?

Yes

please explain:

5. Do you support the proposal to allow relocations of existing venues for certain reasons?

Yes

Please explain:

7. Do you have any other feedback or comments regarding the policy?

Ples refer our submission. Thank you for the opportunity to give feedback.

Attached Documents

Name

Youthtown Inc_Submission to Ashburton District Council





Youthtown Inc.

23 October 2025

Ashburton District Council

2 Baring Square East
Ashburton 770

YOUTHTOWN INC. - ASHBURTON DISTRICT COUNCIL GAMBLING VENUE POLICY REVIEW

Introduction

Youthtown Incorporated (Youthtown) is a Class 4 Gaming Society licensed under the Gambling Act 2003. Youthtown operates 7 gaming machines at the South Rakaia Hotel, located within the Ashburton District.

As one of New Zealand's oldest and most respected not-for-profit organisations, Youthtown has a proud history of developing and supporting young people. The Youthtown Board are committed to generating funding for the community and making a difference to the lives of all young New Zealanders. Each year we support many worthy causes, and the work of Youthtown's own Youth Services, with the common goal of helping young people raise their aspirations, realise their potential and have their achievements recognised.

Youthtown is supportive of positive legislation changes within the industry and all efforts to further minimise harm that is caused from gambling. Youthtown is committed to ensuring an effective Harm Prevention & Minimisation Programme, ensuring they safeguard vulnerable individuals and communities from potential gambling harm. Our systems, and harm prevention & harm minimisation training are considered industry leading, and we pride ourselves on ensuring we use the latest technology available to the industry.

Youthtown appreciates the opportunity to comment on the Ashburton District Council's proposed Gambling Venue Policy and commend Council for its balanced approach to managing the social and economic impacts of Class 4 gaming within the community.

1. Opposition to the Proposed Cap of Five Machines for New Venues

Youthtown **DO NOT SUPPORT** the proposed cap of five machines for new venues.

A restriction of this nature would make it commercially unviable for most potential new venues to operate. It would likely deter investment and limit the ability to replace existing venues that close or relocate, ultimately reducing community funding over time.

Currently, two of the 11 venues in the district are club venues, demonstrating the limited number of locations through which gaming proceeds are generated. With **\$2.2 million in grants** returned locally last year, even small reductions in venue or machine numbers would have a significant impact on community benefit.

Additionally the Ashburton District's **problem gambling data does not indicate high levels of harm**. In 2022/23 there were **only 2 new problem gambling clients** and **a total of 4 clients** identified across the Ashburton District. These figures suggest that the current regulatory environment and venue-level harm minimisation measures are effective.

Restricting new venues to five machines would not reduce gambling harm but would severely limit the future ability to sustain community funding levels.

2. Support of the 20-Venue Cap

Youthtown **SUPPORTS** Council's proposed cap of 20 venues.

This approach maintains an appropriate balance between harm minimisation and the continued ability for community groups, charities, and sporting organisations to access much needed funding.

In 2024 alone, Class 4 gaming in the Ashburton District generated \$7,047,172.97 in gaming machine proceeds resulting in **\$2,209,449.00 in community grants being returned directly to local causes**. These funds are critical to the sustainability of local sport, arts, cultural, and welfare organisation that would otherwise struggle to operate.

A cap of 20 venues allows for stability and continuity in community funding while providing sufficient controls to prevent proliferation.

3. Support the Relocation Provision

Youthtown strongly **SUPPORTS** the inclusion of a **relocation provision**.

This provision ensures that venues affected by lease changes, redevelopment, or natural disasters have a pathway to continue operating in appropriate locations. Without such a provision, communities risk losing significant funding and local employment simply due to circumstances beyond the operator's control.

Relocation provisions provide flexibility while still allowing the Council to ensure venues are located in suitable areas consistent with policy objectives and harm minimisation principles.

Grant Funding:

Class 4 Gaming Venues enable extremely valuable funding to be provided to a large range of local community groups. In 2024, **\$345.66 million in gaming machine funding** was provided to **8,888 community organisations** across New Zealand¹. Many organisations throughout New Zealand including the Ashburton District have benefited from this funding.

The Youthtown funding turnaround is quick, and the application process for community groups is simple, through our online website portal. For the year ending June 2025, Youthtown was extremely proud to return **over \$351k to community organisations** like the Ashburton District, supporting arts & culture, community, education & schools, environment & health and sports.

Class 4 Gaming Societies are the only gambling operators that focus on supporting grassroots community organisations, making a positive difference to many community organisations, which would struggle to survive without this funding. No other gambling provider provides this level of support for community organisations and there is no easy substitute for this funding which is critical to their ongoing sustainability.

The Lottery Grants Board makes a small number of large grants to large organisations. The New Zealand Racing Board predominately uses the funds from race and sports betting to support the racing industry. The profits from the six commercial casinos are paid out to their commercial shareholders (save for a token amount in community grants). No grant money is paid by offshore-based online gambling providers – something which needs to be considered as the Government moves to auction 15 online licenses in 2026.

Ineffectiveness of Sinking Lid Policies, Machine Numbers and Gambling Harm:

Sinking Lid Policies are ineffective. There is no evidence that reducing gaming machines reduces gambling expenditure. There is also no proof that sinking lid policies reduce problem gambling. There is also no link between gaming machine numbers and harm caused. Reducing machine numbers has been tried as a tool to address gambling-related harm but it has not worked. Reducing gaming machine numbers, reduces community funding and accelerates the migration to online gambling with zero return to the community.

Problem Gambling Statistics:

The problem gambling rate in New Zealand continues to plateau and remains low at 0.2% of the New Zealand adult population. The problem gambling rate is for all forms of gambling, not just gaming machine gambling. The Ministry of Health figures have shown that 75% of adult New Zealanders gamble for entertainment, including Lotto, gaming machines, horse and dog racing, sports betting, and casinos. Around 33% of those enjoy playing licensed gaming machines. Gaming machines also have the highest payout rate (91%) among legal gambling forms in New Zealand.

Commitment to Responsible Gambling:

Youthtown aims to provide an environment that supports responsible gambling, understanding that although for some people gambling is a form of entertainment, for others there are some harmful effects. Class 4 Operators are heavily regulated by the Department of Internal Affairs. Regulations require that venue personnel are trained to monitor, identify and support problem gamblers.

Youthtown recognises that face-to-face interaction with gamblers is the most effective way of helping a very small proportion of people who have a problem, to manage that problem, whilst leaving the greatest proportion of people to fulfil their legitimate desire to gamble responsibly.

¹ <https://www.granted.govt.nz/index.html>

Venue personnel must be trained to recognise and intervene problem gamblers. We provide significant on-going training on how to identify the signs of gambling harm, information on the problem gambling services available, and the exclusion order process. Our dedicated and experienced field team are available at any time to provide training and support to venue personnel.

Regulations now require venues to conduct gambling area sweeps three times per hour, track cash withdrawals for gambling purposes, maintain detailed record keeping for all gambler interactions & conversations, and conduct weekly venue manager reviews.

Class 4 Operators provide significant funding of over \$20 million to the Ministry of Health through an annual Problem Gambling Levy – funding that goes towards problem gambling support services nationwide, including the Problem Gambling Foundation and the Gambling Helpline. Class 4 Operators also spend in excess of \$3-4 million annually on harm prevention and minimisation initiatives such as training, compliance, administering the exclusion order process and software development.

Resources and Signage:

Youthtown provides all venues with resources and signage to assist with their obligations as responsible gambling hosts. These can include gambling area sweep books, incident & intervention record books, gaming dairies, exclusion order books, problem gambling awareness brochures and problem gambling awareness signage to display in and around the gaming room. These resources are also now supported by newly developed electronic systems.

Technology and Tools for Harm Minimisation:

Facial Recognition technology is now widely used by Class 4 Operators, providing huge positive benefits to the industry, assisting venue personnel to supervise & monitor gaming rooms and helping to reduce problem gambling relapse amongst individuals. The technology uses high-definition cameras to assist with identifying problem gamblers who may be in breach of their exclusion order. System alerts are generated, prompting further action to approach a player and offer information relating to harmful gambling and the services available for extra help.

Venue personnel can electronically record gambling area sweeps, signs of gambling harm, and complete venue manager reviews. An individual's time spent in the gaming room is measured, sending alerts to staff for intervention and support.

Unintended Consequences of Reducing Gaming Machines:

A reduction in land-based gaming machines only redirects gamblers away from a controlled environment and leads to increased activity through online gambling, which lacks control and sees gambling expenditure redirected to offshore internet and mobile-based offerings, with no profits mandated by law to be returned in the form of grants to the community. Under current legislation, it is not illegal to participate in gambling on an overseas-based website or mobile phone application. Online gambling currently lacks regulation, offers no community funding, and increases risks such as fraud and money laundering.

Westpac NZ recently introduced an account block to support customers struggling with online gambling². For the period 26 June to 25 September 2023 Westpac customers were reported to spend \$136.8 million with online gambling merchants, compared to \$3.2 million at physical locations during the same period. Of that spend, nearly half was with TAB and Lotto, with the remainder distributed among various online gambling business. Annually they also suggest that New Zealanders are spending in excess of \$2.7 billion on online gambling providers, which is only expected to increase.

² <https://www.westpac.co.nz/about-us/media/westpac-nz-introduces-gambling-account-block-to-support-customers/>

Online gambling is highly accessible 24 hours a day from the comfort & privacy of your home, currently unregulated, can involve larger bet sizes, and there are no harm minimisation strategies in place. There is an increased risk for vulnerable individuals and minors – venue personnel are unable to observe and assist individuals showing gambling harm. Online gambling provides no guaranteed return to players & zero community benefit, minimal tax revenue is generated for the New Zealand Government, and no contributions are made via the Problem Gambling Levy. There is also reduced protection against fraud, money laundering or unfair gambling practices.

Summary of Position

Youthtown encourages the Ashburton District Council to retain a policy that balances harm minimisation with the ongoing delivery of substantial community benefit. In summary, Youthtown:

- **Support:** 20-Venue Cap
- **Support:** Relocation provision
- **Oppose:** Five-machine limit for new venues

Youthtown looks forward to continuing its support of the communities in the Ashburton District, ensuring that sport, education, and community organisations in the region continue to receive the valuable support that they all require.

Kind regards

On behalf of Youthtown Incorporated



Fiona Allan
Chief Executive Officer