

Draft Gambling Venue Policy 2025

Summary of feedback

To support Deliberations on 25 November 2025

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Summary of feedback received

Engagement

In May-June 2025, we sought feedback from industry stakeholders to get their thoughts on the effectiveness of the current policy and get their views on the positive and negative social impacts of gambling in the district.

We received feedback from eight stakeholders including venue managers, corporate societies, industry experts and harm minimisation organisations. This feedback, as well as research and a social impact assessment helped us to develop our draft policy and proposal that was then consulted on.

Consultation (summary of feedback presented in this document)

We undertook consultation with the wider community from 29 September to 27 October 2025, alongside the Draft Dangerous and Insanitary Buildings Policy. The feedback received through this period on the Draft Gambling Venue Policy is summarised within this document.

We received a total of 23 submissions, with five submitters indicating they would like to speak at the hearing on 25 November (3 confirmed by 19 November 2025).

Submissions received were from a mixture of 14 individuals, and nine organisations, including:

- Ashburton Club & MSA
- Hospitality New Zealand
- MapuMaia
- New Zealand Community Trust
- NPHS Te Waipounamu
- TAB NZ
- The Gaming Machine Association of New Zealand
- The Lion Foundation
- Youthtown

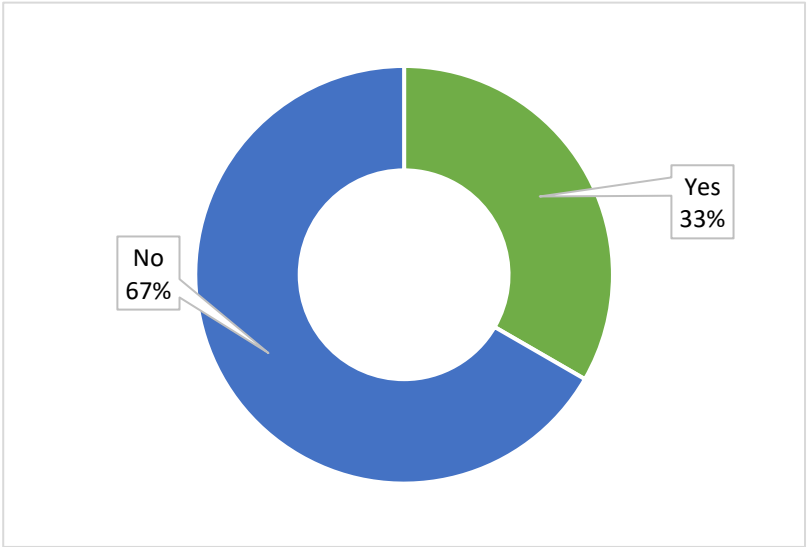
1. Stand alone TAB venues

Section 4 of the draft policy - We proposed to keep this section of the policy the same, allowing a stand-alone TAB venue to establish in the district given it meets the conditions of the policy.

Feedback on the question “Do you support the proposal to allow stand-alone TAB venues to establish in the district?”

	Number of people
Yes	6
No	12
Total	18

The submissions show low support (33%) for the proposal to allow stand-alone TAB venues to establish.



1.1 Submitter comments on stand-alone TAB venues

Submitter name	Page	Summary	Staff comments
Yes, support the proposal to allow stand-alone TAB venues			
GENERAL			
Downes, Cliff (Ashburton Club & MSA)	13	Not highly likely to happen	
Rogers, Nikki (Hospitality New Zealand)	64	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.	
PROBLEM GAMBLING / HARM MINIMISATION			
Lomax, Elizabeth	3	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.	
REDUCE NUMBER OF MACHINES / VENUES			
Tupper, Gordon	7	I support this proposal but would want to exclude any option for the premises to include gambling devices.	

No, do not support the proposal to allow stand-alone TAB venues			
GENERAL			
King, Patricia	5	Place your bets at the races or the local pub.	
PROBLEM GAMBLING / HARM MINIMISATION			
Logan, Marion	19	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	
REDUCE NUMBER OF MACHINES / VENUES			
James, Alf	15	We need fewer, not more, gambling opportunities in our community.	
Pedofsky, Patricia	17	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.	
Martin, Janette	46	Need to deter gambling so less is more	
Mcivor-Seddon, Cale (NPHS Te Waipounamu)	52	Recommend maintaining status quo (e.g. there are no TAB venues) by implementing a prohibition on their establishment. 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.	

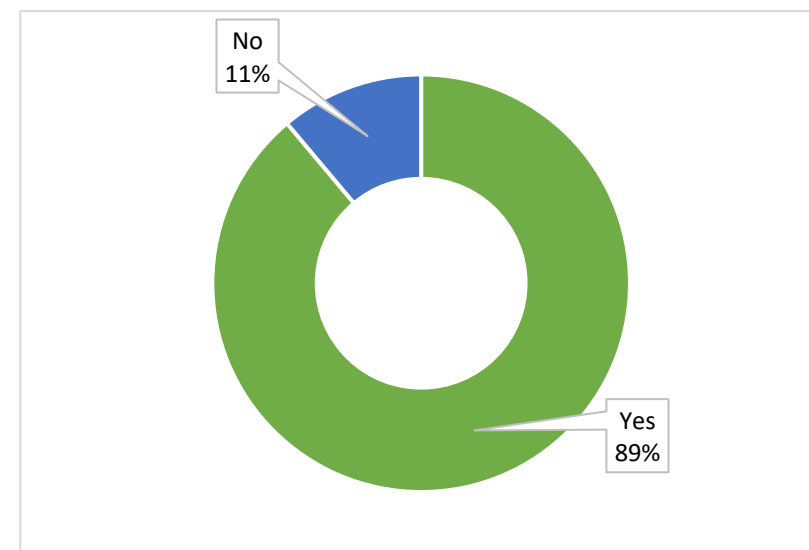
2. Additional location control for high deprivation areas

Section 5.1 of the draft policy - We proposed to largely keep the location controls the same but introduce one additional location control which prohibits venues from establishing in, or existing venues relocating to areas that have a socioeconomic deprivation score of eight or more (indicating high levels of deprivation).

Feedback on the question “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?”

	Number of people
Yes	16
No	2
Total	18

The submissions show strong support (89%) for the proposal.



2.1 Submitter comments on additional location controls

Submitter name	Page	Summary	Staff comments
Yes, support the proposal to introduce additional location controls regarding high deprivation levels			
GENERAL			
Tew, Colin	11	Not necessary	
Downes, Cliff (Ashburton Club & MSA)	13	There are already sufficient locations within Ashburton	
James, Alf	15	Reasons are obvious, assuming our elected decision makers have any understanding or empathy for people in high deprivation areas	
Millar, Niall (TAB NZ)	71	TAB NZ does not oppose this change	
PROBLEM GAMBLING / HARM MINIMISATION			
King, Patricia	5	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.	
Pedofsky, Patricia	17	We need to be mindful of the harm to low - medium socio economic and vulnerable people in our community.	
Martin, Janette	46	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.	
Mcivor-Seddon, Cale (NPHS Te Waipounamu)	52	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	

Submitter name	Page	Summary	Staff comments
		deprivation scores in the lower quintiles. This is due to higher concentrations of gambling venues and EGMs in deprived areas. • 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. • NPHS Te Waipounamu recommends that Council prohibits relocation under any circumstances to align with our sinking lid recommendation.	
Rogers, Nikki (Hospitality New Zealand)	64	• 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.	
Une, Raymond (MapuMaia)	87	• Recommends a ban on venues and machines in high-deprivation areas or areas with high equity risk. Reducing pokies in vulnerable areas is a public health imperative, the most responsible and equitable approach to protecting whānau and community wellbeing.	

No, do not support the proposal to introduce additional location controls regarding high deprivation levels

GENERAL

Logan, Marion	19	• Ashburton is small. Yes don't have in areas of high deprivation and don't increase by any	
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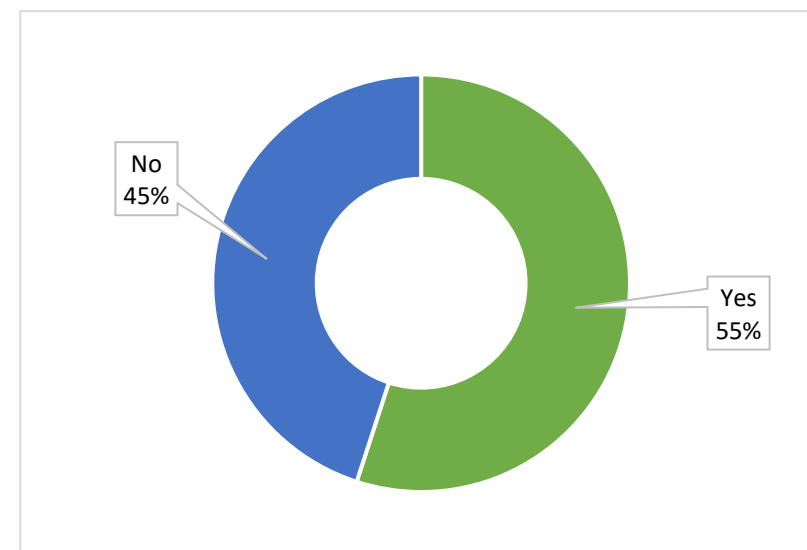
3. Machine cap for new venues

Section 5.2 of the draft policy – we proposed to keep the policy the same for machine caps, continuing to limit the number of machines allowed in a new venue at five. The maximum number of machines allowed under the Gambling Act is nine.

Feedback on the question “Do you support to retain a cap of five machines for any new venues being established in the district?”

	Number of people
Yes	11
No	9
Total	20

The submissions show support (55%) for the proposal.



3.1 Submitter comments on machine cap for new venues

Submitter name	Page	Summary	Staff comments
Yes, support the proposal to retain cap of five machines for new venues			
GENERAL			
Downes, Cliff (Ashburton Club & MSA)	13	Reduce temptation	
Pedofsky, Patricia	17	Will this cap of machines be monitored to check no increase above this cap?	<i>Yes, this cap will be monitored routinely.</i>
REDUCE MACHINES / VENUES			
Lomax, Elizabeth	3	Ideally it should be reduced to zero, but definitely do not increase it.	
James, Alf	15	But would refer a sinking lid.	

No, do not support the proposal to retain cap of five machines for new venues			
GENERAL			
King, Patricia	5	We don't want anymore venues.	
Rogers, Nikki (Hospitality New Zealand)	64	Mixed feedback received on this. 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.	

INCREASE CAP / VIABILITY			
True, Jarrod (The Gaming Machine Association of New Zealand)	21	• Opposes the cap of five machines for new venues. Submitter believes the limit should be the same as the national cap of nine machines. • The Gambling Act expressly permits nine-machine venues. There is no research or evidence to support departing from the national nine-machine limit. Nine machines give customers a greater choice of games to play, which improves the entertainment offering. • 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.	
Goldfinch, Tony (The Lion Foundation)	76	• 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.	
Allan, Fiona (Youthtown)	96	• 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. Restricting new venues to five machines would not reduce gambling harm but would severely limit the future ability to sustain community funding levels. • See full submission for further information and statistics.	

REDUCE MACHINES / VENUES			
Tupper, Gordon	7	i do not support this proposal 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	
Logan, Marion	19	i support no more machines. if that is rejected then 2 not 5	

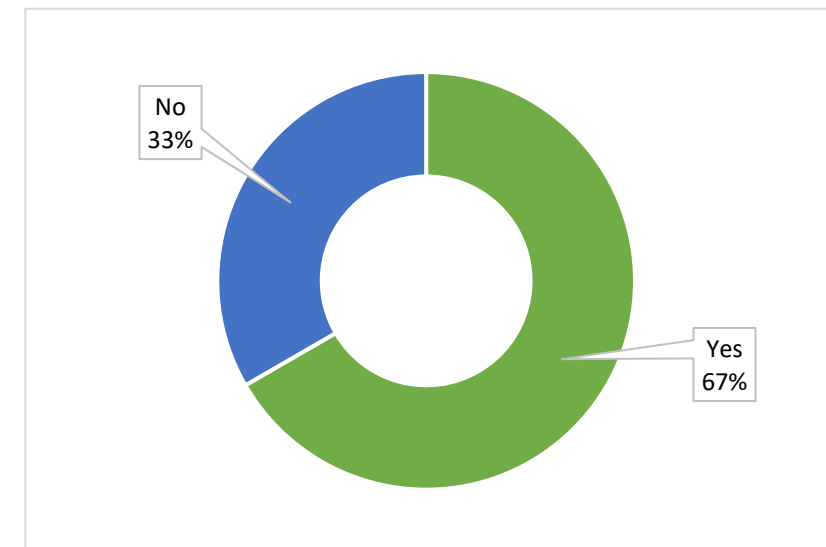
4. District-wide venue cap

Section 5.2 of the draft policy – we proposed to introduce a district wide venue cap of 20 venues. There is currently no cap.

Feedback on the question “Do you support the proposal to introduce a district-wide cap of 20 venues?”

	Number of people
Yes	14
No	7
Total	21

The submissions show strong support (67%) for the proposal.



4.1 Submitter comments on district-wide venue cap

Submitter name	Page	Summary	Staff comments
Yes, support the proposal to introduce a cap of 20 venues within the district			
GENERAL			
King, Patricia	5	20 is enough.	
Tew, Colin	11	More than enough !	
True, Jarrod (The Gaming Machine Association of New Zealand)	21	- 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%.	
Salisbury, Jo (New Zealand Community Trust)	36	The new policy supports a system that provides your district with a popular form of entertainment that also delivers extensive community benefits.	
Rogers, Nikki (Hospitality New Zealand)	64	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.	
Goldfinch, Tony (The Lion Foundation)	76	TLF supports the introduction of the proposed 20 venue cap within the district.	
Allan, Fiona (Youthtown)	96	- 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. A cap of 20 venues allows for stability and continuity in community funding while providing sufficient controls to prevent proliferation. - See full submission for information community grants returned to local causes.	

Submitter name	Page	Summary	Staff comments
REDUCE MACHINES / VENUES			
Lomax, Elizabeth	3	Ideally it should be zero.	
Tupper, Gordon	7	I would support this on the basis that the cap is reduced.	
Pedofsky, Patricia	17	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.	

No, do not support the proposal to introduce a cap of 20 venues within the district

GENERAL

Downes, Cliff (Ashburton Club & MSA)	13	Believe there are currently sufficient venues.	
REDUCE MACHINES / VENUES			
James, Alf	15	Would prefer a sinking lid.	
Logan, Marion	19	no keep at 12. it's blood money- feeding off peoples addictions and stress	

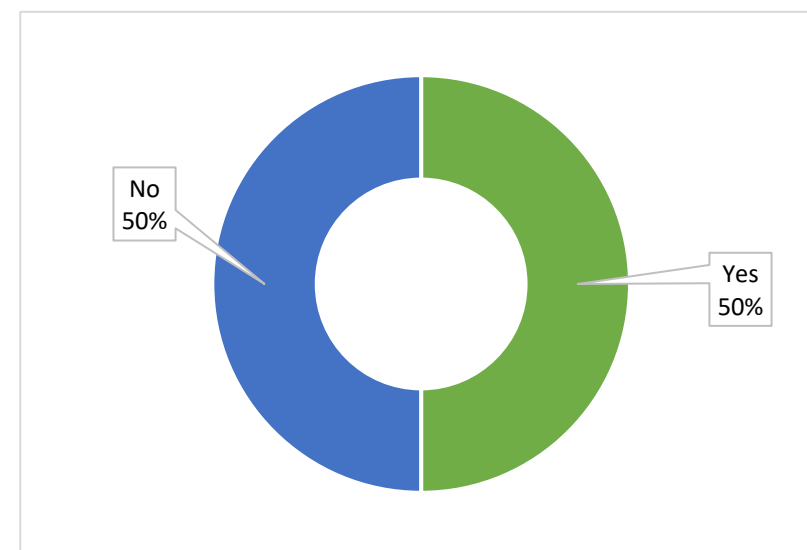
5. Relocations of existing venues

Section 5.3 of the draft policy – we proposed to update the policy to permit existing venues to relocate to an alternative site while retaining the same consent conditions for specific reasons. Relocations would be subject to additional conditions and would only be permitted where the venue is moving to a new location within the same town and the proposed area has a deprivation score of seven or less (medium to low deprivation).

Feedback on the question “Do you support the proposal to allow relocations of existing venues for certain reasons?”

	Number of people
Yes	11
No	11
Total	22

The submissions were split on the relocation proposal.



5.1 Submitter comments on allowing relocations for certain reasons

Submitter name	Page	Summary	Staff comments
Yes, support the proposal to allow relocations for certain reasons			
GENERAL			
Tupper, Gordon	7	The rationale for this allowance makes sense.	
Downes, Cliff (Ashburton Club & MSA)	13	Circumstances change that may require relocation.	
True, Jarrod (The Gaming Machine Association of New Zealand)	21	- 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. - 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.	
Salisbury, Jo (New Zealand Community Trust)	36	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	

Submitter name	Page	Summary	Staff comments
		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.	
Rogers, Nikki (Hospitality New Zealand)	64	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.	
Millar, Niall (TAB NZ)	71	TAB NZ supports this change and further recommends extending the relocation policy relating to Class 4 venues to also be applied 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.	<i>Under our draft policy, if a stand-alone TAB venue wanted to relocate it could apply to Council for permission as a new venue.</i>
Goldfinch, Tony (The Lion Foundation)	76	TLF supports the adoption of the proposed relocation provisions.	
Allan, Fiona (Youthtown)	96	- 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.	
DEPRIVATION LEVELS			
Pedofsky, Patricia	17	Only with strict controls - not in high deprivation areas. Limiting their existing machines to half their number.	
PROBLEM GAMBLING / HARM MINIMISATION			
Logan, Marion	19	If to reduce harm	

Submitter name	Page	Summary	Staff comments
True, Jarrod (The Gaming Machine Association of New Zealand)	21	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.	

No, do not support the proposal to allow relocations for certain reasons

GENERAL

Lomax, Elizabeth	3	No new or “improved” gambling operations.	
King, Patricia	5	Unless we put them where the gamblers can't find them, they might as well stay where they are; ie pubs and clubs?	
James, Alf	15	Leadership that cares would take every opportunity to reduce this hazard.	

6. Other changes

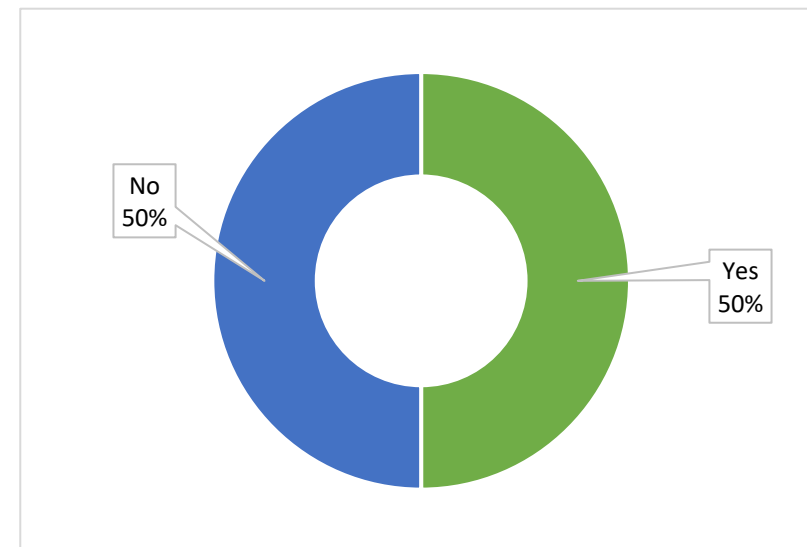
Other proposed changes included:

- *The introduction of a glossary and definitions section*
- *Merging of clauses for clarity and continuity*
- *The introduction of principles that guide the policy*
- *Minor wording changes, heading updates and re-ordering*
- *An additional clause (6.1) regarding applications and fees to clarify when an application is required*
- *Updates to parts of the decision making process (removal of references to environmental services committee).*

Feedback on the question “Do you agree with our other proposed changes?”

	Number of people
Yes	5
No	5
Total	10

The submissions were split on the other proposed changes.



6.1 Submitter comments on other proposed changes

Submitter name	Page	Summary	Staff comments
Yes, support the other proposed changes			
No comments received.			

No, do not support the other proposed changes			
DEPRIVATION LEVELS			
Tupper, Gordon	7	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.	<i>While our townships may be considered small in size, socioeconomic deprivation is measured per statistical area 1 (SA1) based on the following Census variables:</i> <i>Communication (access to internet)</i> <i>Income</i> <i>Employment</i> <i>Qualifications</i> <i>Home ownership</i> <i>Support</i> <i>Living space</i> <i>Dwelling condition.</i>
PROBLEM GAMBLING / HARM MINIMISATION			
Kelland, Robyn	50	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. Other comments

Feedback on the question “Do you have any other feedback or comments regarding the policy?”

Submitter name	Page	Summary	Staff comments
GENERAL / ENTERTAINMENT			
True, Jarrod (The Gaming Machine Association of New Zealand)	21	- Gambling is a popular form of entertainment that most New Zealanders participate in. - The majority of people who gamble do so because they find it an enjoyable activity. - Gambling for the non-addicted gambler may also be an avenue for socialising, stress relief and a way of having fun. - See full submission for further details and statistics.	
Salisbury, Jo (New Zealand Community Trust)	36	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.	
Goldfinch, Tony (The Lion Foundation)	76	Available research has concluded that gambling is a popular form of entertainment that people find enjoyable. See full submission for more information.	
COMMUNITY WELLBEING			
True, Jarrod (The Gaming Machine Association of New Zealand)	21	- The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis, found that gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.74b to \$2.16b per annum. - See full submission for further details.	
Salisbury, Jo (New Zealand Community Trust)	36	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.	

Submitter name	Page	Summary	Staff comments
Mcivor-Seddon, Cale (NPHS Te Waipounamu)	52	- It is often argued that the return of gambling revenues to the community through community grants is a net benefit of allowing electronic gaming machines (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. 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. - 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 - See full submission for more details and statistics.	
Goldfinch, Tony (The Lion Foundation)	76	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.	
COMMUNITY FUNDING			
Rushton, Claire	48	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	<i>Central Government has recently (after close of consultation) announced a proposal to ringfence 4 percent of the Offshore Gambling Duty specifically for community returns (such as local sports and community groups).</i>
Kelland, Robyn	50	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.	

Submitter name	Page	Summary	Staff comments
True, Jarrod (The Gaming Machine Association of New Zealand)	21	- Submission notes the community funding and revenue breakdown - See full submission for further details.	
Millar, Niall (TAB NZ)	71	Submission notes TAB NZ's commitment to community benefit demonstrated through its Class 4 operation. All grants and funds distributed by TAB NZ are done through the Bobby Foundation. See the full submission for more information and statistics.	
Salisbury, Jo (New Zealand Community Trust)	36	- Supports draft policy and proposed caps - 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.	
Goldfinch, Tony (The Lion Foundation)	76	- 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. - More information included in full submission, as well as funding application outcomes for 2025.	
Allan, Fiona (Youthtown)	96	- Class 4 Gaming Venues enable extremely valuable funding to be provided to a large range of local community groups. - See full submission for further information and statistics around grants funding.	

Submitter name	Page	Summary	Staff comments
ONLINE GAMBLING			
James, Alf	15	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.	<i>Central Government has recently (after close of consultation) announced a proposal to ringfence 4 percent of the Offshore Gambling Duty specifically for community returns (such as local sports and community groups).</i>
True, Jarrod (The Gaming Machine Association of New Zealand)	21	- 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 31 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. - 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. - 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	<i>Central Government has recently (after close of consultation) announced a proposal to ringfence 4 percent of the Offshore Gambling Duty specifically for community returns (such as local sports and community groups).</i>

Submitter name	Page	Summary	Staff comments
		bonuses to a customer's account for each friend that they induce to also open an account and deposit funds. • 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. • 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). • More statistics and information included in the full submission.	
Salisbury, Jo (New Zealand Community Trust)	36	• 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.	
Allan, Fiona (Youthtown)	96	• 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. • See full submission for further feedback.	
Une, Raymond (MapuMaia)	87	• 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	

Submitter name	Page	Summary	Staff comments
		is to address both forms of gambling, while prioritising the reduction of the more harmful option in the community.	
PROBLEM GAMBLING / HARM MINIMISATION			
Lomax, Elizabeth	3	- 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.	
Logan, Marion	19	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.	
Mcivor-Seddon, Cale (NPHS Te Waipounamu)	52	- Notes that out of all forms of gambling, electronic gaming machines are the most harmful. The harm is underscored in the disproportionate representation among those who seek help services, as well as their consistently large contribution to annual gambling expenditure. See full submission for further details and statistics. - Ashburton District has higher rates of people seeking help services for gambling compared to the national average in 2022/23. - See full submission for further details and statistics.	
Goldfinch, Tony (The Lion Foundation)	76	Submission details commitment to preventing and minimising harm from gambling.	

Submitter name	Page	Summary	Staff comments
Une, Raymond (MapuMaia)	87	• Recommends strengthened harm-minimisation requirements for all venues, including improved staff training, proactive host responsibility, and clear accountability mechanisms. • Notes that gaming machines are among the most harmful forms of gambling and are strongly associated with higher addiction risk. • Notes that Pacific communities are significantly more likely to face moderate to serious gambling risks than non-Māori, non-Pacific populations. • Research shows that gambling harm is often delayed and can accumulate over time. • See full submission for further details on gambling harm.	
CURRENT REGULATION			
True, Jarrod (The Gaming Machine Association of New Zealand)	21	• Submission notes existing gaming machine safeguards. See full submission for further details.	
Millar, Niall (TAB NZ)	71	• 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. See full submission for more details.	
Goldfinch, Tony (The Lion Foundation)	76	• The Class 4 sector is highly regulated – see examples in full submission.	
Allan, Fiona (Youthtown)	96	• Submission notes commitment to responsible gambling and the technology and tools currently used for harm minimisation such as facial recognition.	
REDUCE MACHINES / VENUES			
King, Patricia	5	• 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.	<i>There are currently no casinos in Ashburton District.</i>
Une, Raymond (MapuMaia)	87	• Recommends no increase in Class 4 venues or gaming machine numbers, rejecting controlled growth.	

Submitter name	Page	Summary	Staff comments
SINKING LID - SUPPORT			
Mcivor-Seddon, Cale (NPHS Te Waipounamu)	52	- 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. - 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 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. - Evidence shows that sinking lid policies are extremely effective at reducing the amount of money spent on EGMs. - 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. - There is already a higher machine per capita ratio in the Ashburton District than the national average. See full submission for more information and statistics. - 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.	<i>A sinking lid approach was not adopted as Councils preferred option for consultation.</i>
Une, Raymond (MapuMaia)	87	- Recommends a sinking lid policy to steadily reduce machine numbers over time through natural venue closure. 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. - See full submission for further details.	

Submitter name	Page	Summary	Staff comments
SINKING LID – OPPOSE			
Salisbury, Jo (New Zealand Community Trust)	36	• 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. • 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. See full submission for supporting statistics. • See full submission for further statistics and context on NZ's problem gambling rates, and further information on current Class 4 regulation.	A sinking lid approach was not adopted as Councils preferred option for consultation.
Allan, Fiona (Youthtown)	96	• 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.	