

Gambling Venue Policy – Stakeholder Engagement Summary of feedback

To support the Report on Class 4 Gambling in Ashburton District

Table of contents

1.1	Summary of feedback received	3	1.4	Feedback on the social impacts of class 4 gambling.....	14
1.2	Feedback on the current policy objectives	4	1.5	Other Feedback.....	15
1.3	Feedback on the number of venues and machines in the district	10			

1.1 Summary of feedback received

Stakeholder engagement was carried out from Wednesday 14th May to Friday 13th June 2025. This included a survey with targeted questions related to the effectiveness of the current policy in meeting its objectives:

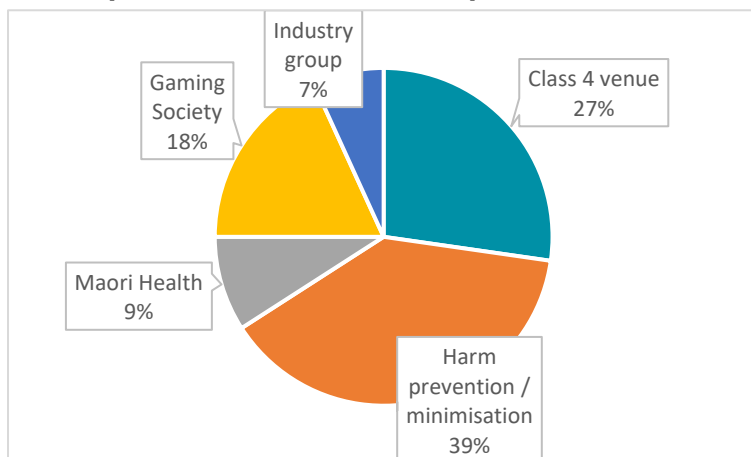
- To ensure the council and the community has influence over the provision of new class 4 and TAB gambling venues in the Ashburton District.
- To enable the council and the community to influence the operation of existing class 4 and TAB gambling venues in the Ashburton District.
- To allow those who wish to participate in class 4 and horse and sports gambling to do so within the Ashburton District.
- To minimise any potential negative social and economic impacts of class 4 and horse and sports gambling in the Ashburton District.
- To ensure the Ashburton District community is able to maximise the benefits from class 4 gambling proceeds returned to the community.

Stakeholders were also asked to share their knowledge and feedback related to the social impacts of class 4 gambling in our district to help inform the 2025 social impact report.

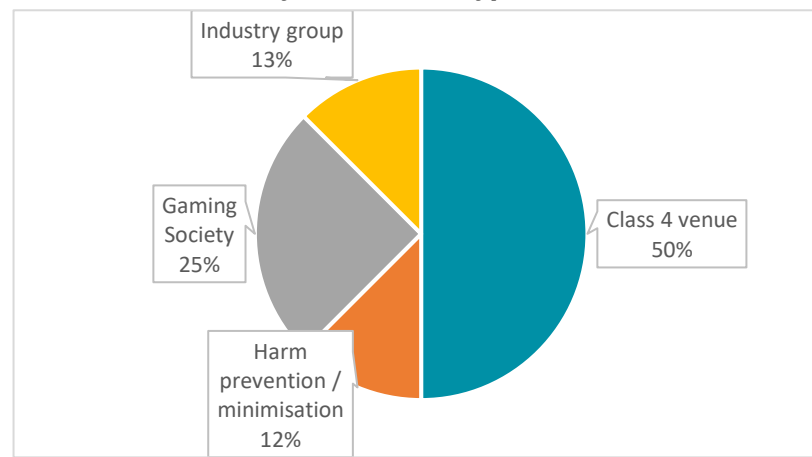
Summary of stakeholders

44 stakeholders comprised of gaming societies, class 4 venues, harm prevention / minimisation agencies, Maori health services and other interested industry groups were invited to provide feedback. Of the 44 invited, 7 survey responses were received and 1 late submission received via email.

Make up of stakeholders invited to provide feedback



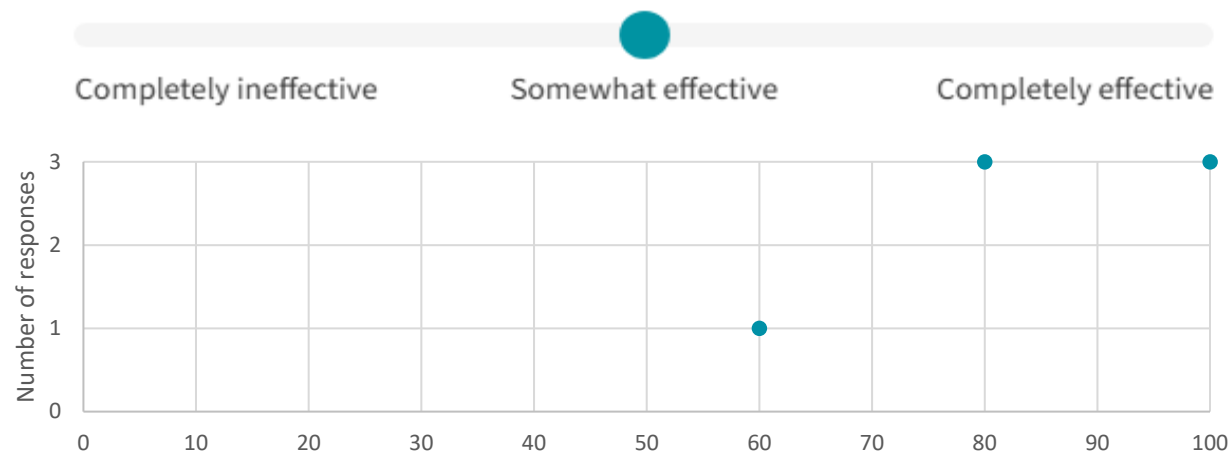
Feedback received by stakeholder type



1.2 Feedback on the current policy objectives

Stakeholders were asked “ Overall, how effective do you think our policy is in achieving the intended objectives?”

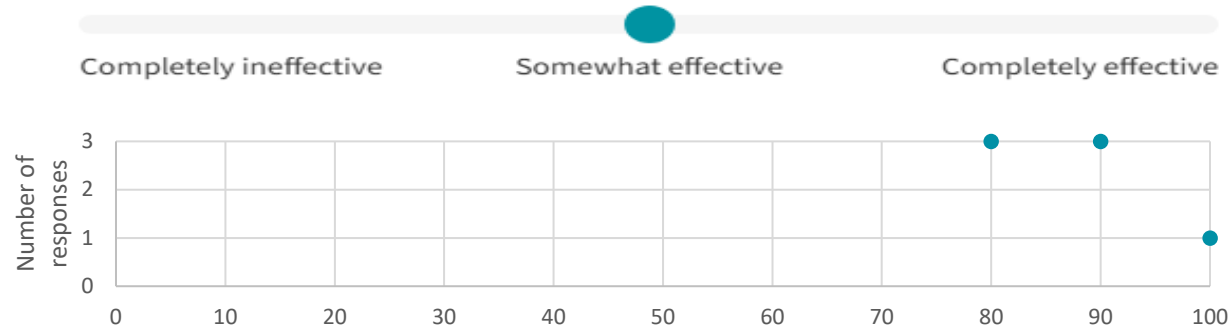
Please use the scale below to indicate the effectiveness of the current policy.



	Number of people
Completely Effective	3
Somewhat Effective	4
Completely Effective	0
Total	7

Submitter name	Page number	Summary
The Lions Foundation 2008		It is our submission that the Council’s policy does optimise continue the balance between reasonable controls over the incidence of problem gambling against the generation of funds for the community from legitimate gambling. This was our feedback in 2021. The current policy currently balances all purpose of the Gambling Act.
New Zealand Comminuty Trust		New Zealand Community Trust (NZCT) supports Council’s current gaming policy – no cap on machines and allowing relocations. The current policy preserves a system that provides your district with a popular form of entertainment that also delivers extensive community benefits. Your current policy is balanced.
Devon Tavern		I think it is fine the way it is. BUT we don't need any more venues with gaming.
The Gaming Machine Association of New Zealand		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. offshore-based internet and mobile phone gambling.
Ashburton RSA		I have heard no negative comments in our area.

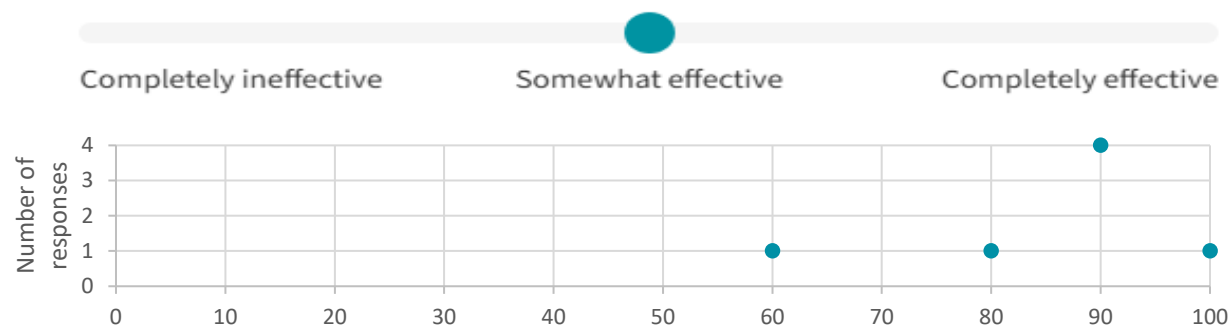
Stakeholders were asked “ How effective is the current policy for ensuring the Council and community have influence over the provision of new class 4 and TAB venues in the district?”



	Number of people
Completely Effective	1
Somewhat Effective	6
Completely Effective	0
Total	7

Submitter name	Page number	Summary
The Lions Foundation 2008		TLF would not be opposed to the Council adopting a slightly more restrictive Gambling Policy - one which caps the number of EGMS operating in Venues, as well as the total number of Venues licensed to operate EGMS. The current Gambling policy allows for a new venue to be licensed to operate a maximum of 5 EGMS.
New Zealand Community Trust		Refer to submission
Devon Tavern		I think we have enough venues now and they are controlled properly.
South Rakaia Hotel		Most guests understand and support it, but occasionally we encounter guests who oppose it.
Ashburton Club & MSA		There is a limit on the number of machines allowed
The Gaming Machine Association of New Zealand		Local gaming machines numbers continue to decline. In March 2015, the Ashburton District had 154 gaming machines. In December 2024, the District had only 131 gaming machines. Problem gambling presentations from persons based in the Ashburton District are extremely low (2 new clients in 2022/23).
Ashburton RSA		Each establishment has to monitor its own gaming area - and to be prepared with harm minimisation policies

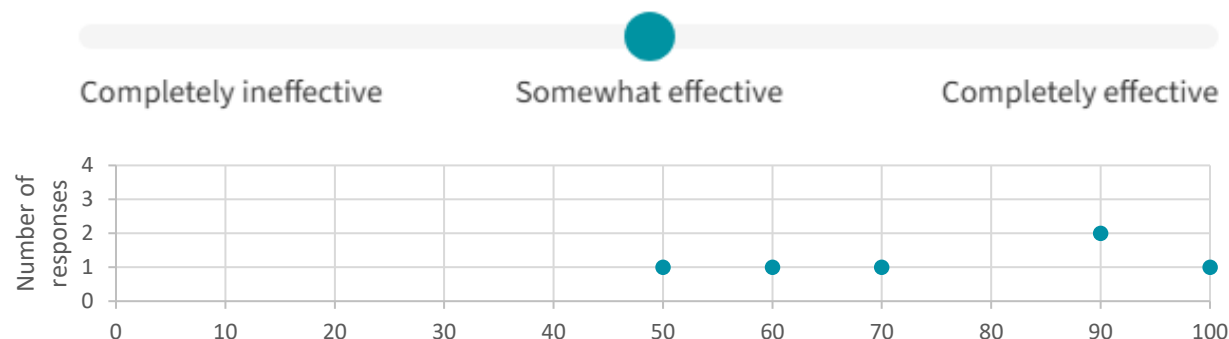
Stakeholders were asked “ How effective is the current policy for ensuring the Council and community have influence over the provision of existing class 4 and TAB venues in the district?”



	Number of people
Completely Effective	1
Somewhat Effective	6
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Submitter name	Page number	Summary
The Lions Foundation 2008		The current policy was adopted in 2022 after due and proper consultation. Once again, Council (persons elected by members of that community to safeguard their interests) have again embarked on a consultative process to ensure that the voice of the community is being heard. Unlike many other Councils throughout the motu, The Ashburton City Council is well across its obligations to review the policy every three years. This ensures that ensuring that community members have a regular say on policies that affect the community.
New Zealand Comminuty Trust		Refer to submission
Devon Tavern		We need to have a handle on Gambling
The Gaming Machine Association of New Zealand		Local gaming machines numbers continue to decline. In March 2015, the Ashburton District had 154 gaming machines. In December 2024, the District had only 131 gaming machines.Problem gambling presentations from persons based in the Ashburton District are extremely low (2 new clients in 2022/23).

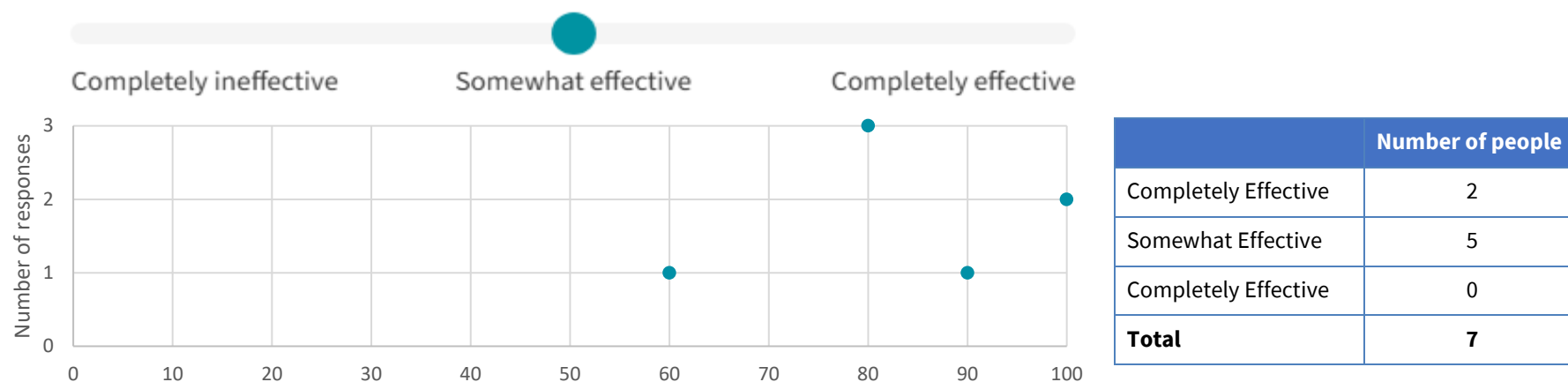
Stakeholders were asked “ How effective is the current policy for allowing those who wish to participate in class 4 and horse and sports gambling to do so within the Ashburton District?”



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Completely Effective	1
Somewhat Effective	6
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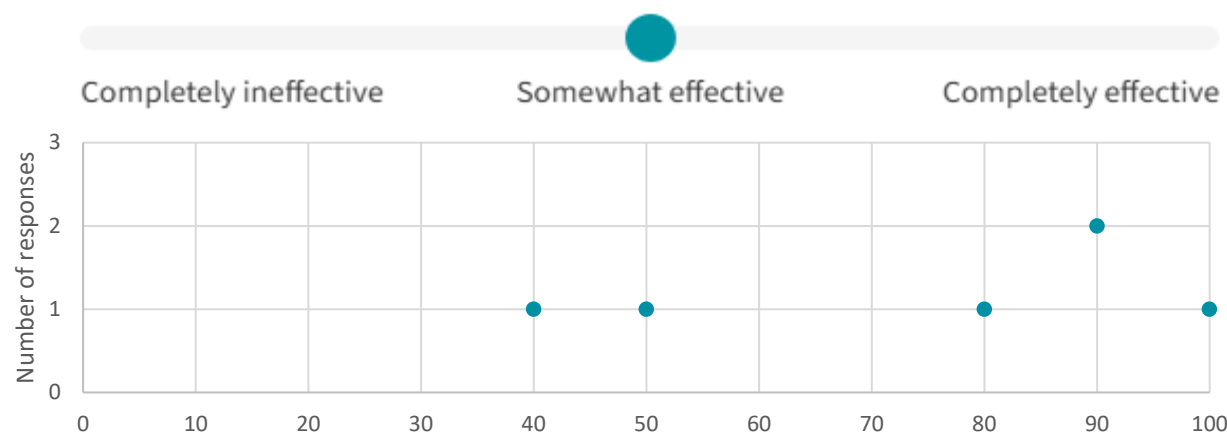
Submitter name	Page number	Summary
The Lions Foundation 2008		The current policy allows for growth - which ensures that people who wish to exercise their right to gamble can do so in safe and secure environments. The operation of EGMS in class 4 venues in Ashburton is a legitimate and legal R18 activity. Most New Zealanders participate in legal gambling activities. And most do so because they enjoy the activity. Closing physical environments (effect of sinking lid policies) will drive people to [currently] unregulated online gambling websites, which offer no protection to the player, provide no funding for communities and provide little to no harm minimisation tools.
New Zealand Comminuty Trust		Refer to submission
Devon Tavern		It is regulated effectively now.
The Gaming Machine Association of New Zealand		The five machine limit is no appropriate.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.

Stakeholders we asked “ How effective is the current policy in minimising any potential negative social and economic impacts of class 4 and horse and sports gambling in the district?”



Submitter name	Page number	Summary
The Lions Foundation 2008		In terms of available data - more specifically the data recorded by the Ministry of Health, problem gambling representations (excluding brief interventions) are very low. Given the current environment of high regulation and naturally reducing machine numbers as well as the fact that there is no evidence to support the finding that a reduction in venues or machines results in a reduction in problem gambling, it would be inappropriate to adopt a more restrictive policy - ie a sinking lid policy.
New Zealand Comminuty Trust		Submission
Devon Tavern		I don't see any issues
The Gaming Machine Association of New Zealand		Adopting a more restrictive policy is not necessary given the significant measures that are already in place to minimise the harm from gaming machines. 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%.
Ashburton RSA		Here at the RSA we do not have to worry about the horse racing but I assume it has the same strict policies in place as the gaming.

Stakeholders we asked “ How effective is the current policy for ensuring our community is able to maximise the benefits from class 4 gambling proceeds returned to the community?”

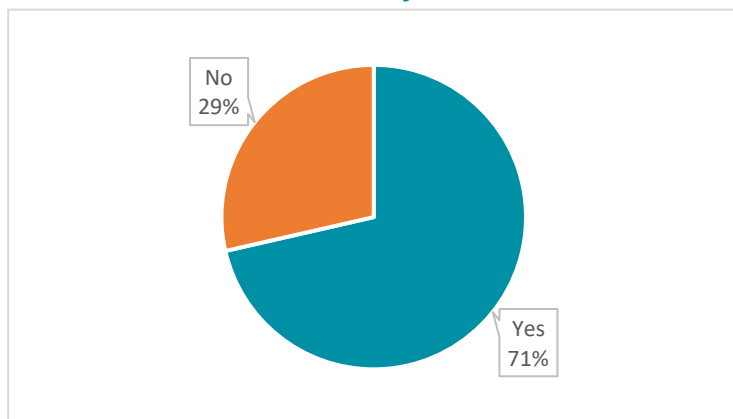


	Number of people
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Submitter name	Page number	Summary
The Lions Foundation 2008		The current policy allows for a small amount of growth, allows for relocations. By adopting a policy which does not advocate a sinking lid, the Council has ensured that funding will remain available to the Ashburton Community. As stated previously, TLF is of the opinion that a capped policy would still protect the source of funding that is generated by Class 4 gambling in pubs.
New Zealand Community Trust		Under the current system, your community significantly benefits 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.
Devon Tavern		It runs well as alot of Clubs etc... wouldn't survive without these extra funds
The Gaming Machine Association of New Zealand		In 2023, grants totalling \$1,565,346.00 were made to the Ashburton District. The removal of the five machine limit and adopting a more comprehensive relocation policy would help to keep the funding sustainable.
Ashburton RSA		As required by the DIA a percentage of the gaming proceeds is to be returned to the community.

1.3 Feedback on the number of venues and machines in the district

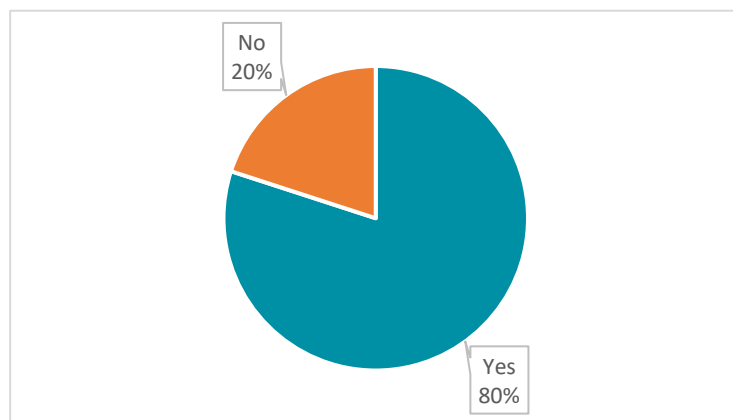
Stakeholders were asked “ Do you think Council should continue to consider additional class 4 gambling venues?”



Submitter name	Page number	Summary
The Lions Foundation 2008		Gambling is a legal and legitimate form of adult recreational activity. TLF is not here to grow gambling; we believe though that pragmatic use of funds generated by this legalized form of entertainment make a hugely positive contribution to community life across New Zealand. We have stated previously that we would not be opposed to a slightly more restrictive policy - that is a capped policy. A capped policy could continue to allow for a small amount of growth (for example an addition of two new venues operating 5 EGMS each). The data available suggests that since 2016 - the number of EGMS operating in Ashburton has steadily declined - no growth despite a fairly enabling policy. Certainly, no data/ evidence that suggest a sinking lid policy is required.
New Zealand Community Trust		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% decrease ¹ . 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 This Health NZ data clearly shows there is no correlation between sinking lid policies and a reduction in gambling-related harm.
Devon Tavern		I think we have enough.

Submitter name	Page number	Summary
The Gaming Machine Association of New Zealand		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.
Ashburton RSA		I think the Ashburton area has sufficient gaming machines to meet the requirements of those gambling.
Ashburton MSA		There are sufficient venues already

Stakeholders that responded “yes” were asked “ If yes, do you think Council should allow relocations for existing venues?”



Submitter name	Page number	Summary
The Lions Foundation 2008		<p>Venue Relocation is a very effective harm minimisation - this was recognised in 2013 when the Gambling Act was amended to enable the relocation of venues and retain the same number of EGMS.</p> <p>Council could consider a more flexible relocation clause. Possibly, the relocation provisions of the existing policy could be expanded to specifically include:-</p> <ul style="list-style-type: none"> - relocations out of earthquake prone buildings to more suitable / stronger buildings; - relocations to more modern and refurbished buildings; - to allow venues to relocate in circumstances where landlords are demanding exorbitant rental fees. There is anecdotal evidence which suggests that where a venue has obtained a license to operate EGMS, its value is artificially increased, and some unscrupulous landlords demand exorbitant rentals. A more flexible relocation clause would "even the playing field".
Devon Tavern		Why would you need to?
The Gaming Machine Association of New Zealand		<p>Venue relocation is a harm minimisation tool.</p> <p>If a venue wishes to relocate out of a high deprivation area to a lower deprivation area, the policy should permit this. 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.</p> <p>If a venue wishes to relocate out of a suburban/residential area to a more suitable area, such as a central business</p>

Submitter name	Page number	Summary
		<p>district, the policy should permit this. 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.</p> <p>The relocation policy should also be flexible enough to support 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.</p> <p>The relocation policy should enable 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.</p> <p>The relocation policy should enable venues to move out of earthquake-prone buildings to stronger, more modern buildings. This is a health and safety issue.</p> <p>It would also be reasonable to also 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.</p>
Ashburton RSA		Limiting the number in the establishments limits the choices of serious punters to gamble on all the machines

Stakeholders that responded “no” were asked “ If not, what mechanism(s) do you believe are the most effective for achieving a reduction in venue / machine numbers over time? “

Mechasim	Number of responses
Capped number of venues	0
Sinking lid policy	0
No relocation policy	0
All of the above	2
None of the above	0

1.4 Feedback on the social impacts of class 4 gambling

Stakeholders were asked “ Which of the negative impacts below derived from class 4 gambling are most prevalent in the Ashburton District?”

Ranking of prevalence	Negative impact
1	Financial hardship: debt, poverty or bankruptcy as a result of gambling losses
2	Mental health issues: stress, anxiety, depression and addiction
3	Family and relationship strain: family violence, relationship break ups or increased interpersonal conflict
4	Crime and legal issues: theft, payment defaults and other criminal activity
5	Disproportionate impact on vulnerable communities: exacerbating poverty and hardship in existing high deprivation areas
6	Study and employment: loss of productivity, disciplinary issues and absenteeism

Submitter name	Page number	Summary
The Lions Foundation 2008		Unfortunately, as an organisation we aren't that closely linked to the particular negative impacts within your community. We have tried to rank the negative impacts but do want to point out that this is based on some literature and not personal experience. However, our relationship with the Braided Rivers Community Trust ensures that we are working closely with members of the community who are indeed across the negative impacts. The distribution of funding reflects this.

Stakeholders were asked “ From the list below, which provide the greatest benefit to the Ashburton District?”

Ranking of greatest benefit	Considerations
1	Community funding through grants

2	Employment opportunities in class 4 venues and community organisations delivering grants
3	Entertainment from watching and betting on sports events or casual use of pokie machines
4	Social interaction associated with visiting gambling venues
5	Increasing revenue for local venues that have pokie machines and/or televise horse racing and other sporting events

Submitter name	Page number	Summary
The Lions Foundation 2008		Again - referencing the distribution of funding through our relationship with Braided Rivers Community rust.
The Gaming Machine Association of New Zealand		<p>Gambling is a popular form of entertainment that most New Zealanders participate in. The 2025 New Zealand Gambling Survey 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).</p> <p>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.</p>

1.5 Other Feedback

Stakeholders were asked “ Do you have any other comments you would like to add related to our policy or the societal impacts of class 4 gambling in our district?”

Submitter name	Page number	Summary
New Zealand Community Trust		<p>Other key points in submission attached to survey</p> <ul style="list-style-type: none"> • New Zealand's rate of problem gambling is low by international standards. • Class 4 is Heavily Regulated

Submitter name	Page number	Summary
		<ul style="list-style-type: none"> • 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. • 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. • Class 4 spending is not growing • The Council's 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. • Gambling Has a Net Positive Wellbeing Benefit
The Gaming Machine Association of New Zealand		<p>The Government has recently confirmed that it has made a decision to regulate online casino gambling and issue online gambling licences from early 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).</p> <p>Other points in submission attached to survey</p> <ul style="list-style-type: none"> • The Association supports retention of the current policy. However, if the policy was to be made available for formal consultation, the Association asks that the limit of five machines for new venues be replaced with the national limit of nine machines and a more comprehensive relocation policy be adopted. • If the policy is submitted for public consultation, consideration should be given to expanding the current relocation policy. • If the policy is submitted for public consultation, consideration should be given to removing the limit of five machines for new venues. • The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis⁵, found that gambling in New Zealand had a net positive wellbeing benefit totalling around \$1.74b to \$2.16b per annum. • Adopting a more restrictive policy is not necessary given the significant measures that are already in place to minimise the harm from gaming machines. • The current policy is reasonable, given the current environment of high regulation and naturally reducing machine numbers. • 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.