

30 January 2004

Matthew Pearce
Project Manager - Gambling Harm Minimisation Review
Independent Pricing and Regulatory Tribunal
PO Box Q290
QVB Post Office NSW 1230

Dear Matthew,

Re: Review into Gambling Harm Minimisation Measures (ref 03/213)

Thank you for advising the AHA that the following six reports were publicly available and that IPART sought our comments on these reports. The AHA has contributed to the responses provided by the GIO and makes the following comments to represent the interests of all members. We appreciate the opportunity to make **this** submission.

1. A C Nielson, 2003, *Evaluation of the Impact of the Three Hour Shutdown of Gaming Machines - Final Report*, May.

This research indicates that the three hour shut down has had no meaningful impact on problem gambling. It can further be deduced that further shut-downs will have limited impact on problem gambling while problem gamblers have access to gambling machines. This raises the issue that legislation was introduced that materially affected numerous businesses and added to costs without any real justification or rationale.

The obvious problems with this study included the difficulty in identifying problem gamblers with the outcome that small and unreliable samples are used, interpretation of data is tainted by classic external "attribution" of blame or denial demonstrated by problem gambler respondents makes the results difficult to believe. The criterion on which the selection of a research partner was not identified. This further raises the issue why a research firm was selected for such a study without adequate gambling expertise.

2. Auckland UniServices Limited, 2003, *Assessment of the Research on Technical Modifications to Electronic Gaming Machines in NSW, Australia - Final Report*, May.

This paper makes a limited contribution to responsible gaming. If critically and objectively interpreted, it shows there is no real evidence to support changes in public policy to include the introduction of reel spin modification, a reduction in bet size or the reconfiguration of bill acceptors as effective tools in responsible gambling. It is the AHA's opinion that poorly supported claims that the introduction of further amendments to gaming legislation may be useful in responsible gambling as insufficient justification for changes.

3. Consumer Contact, 2003, *Testing of Harm Minimisation Messages for Gaming Machines*, May.

The study did not demonstrate appropriate experimental design, it lacked suitable controls and there was little apparent rationale to the stimulus. The researchers did not apply any knowledge from the extensive literatures on warning labels, social marketing, the influence of promotional messages or the influences of gambling behaviour that would be reasonably expected in such a study. This study was very disappointing, the results can not be believed and it should not be used as the bases of any public policy related to warning messages on gaming machines.

4. Dickerson, M., Haw, J., and L. Shepherd, 2003, *Psychological Causes of Problem Gambling: A Longitudinal Study of At Risk Recreational EGM Players*, March.

This was an interesting study that initially offers some potential. However the assumption that gaming triggers other mental disorders is not substantiated in this paper, and there is insufficient other research to justify this position. Further, the assumption that accessibility to gaming machines is tenuous at best. Both points were clearly refuted using empirical data in the AHA's original submission to IPART. The measures used to test a wide range of psychological states are still developmental, and the combination of the range of measures used may undermine the study. The conclusion that all regular players suffer harmful effects from gaming is without support, and if this principle is taken to apply to other products, lacks logic and theoretical **support**. Further, the implication that existing measures of responsible gambling management are ineffective is not supported in this study and is fundamentally rejected by the **AHA** who are conveners of a very effective scheme of responsible gambling.

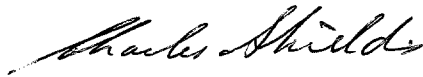
5. Hing, N., 2003, *An Assessment of Member Awareness, Perceived Adequacy and Perceived Effectiveness of Responsible Gambling Strategies in Sydney Clubs*, September.

The initiatives undertaken by AHA members in responsible gambling are clearly innovative and represent international best practice. The AHA was not the subject of this study and the AHA uses different strategies in the management of responsible gambling. Accordingly the AHA passes no comment on this paper.

6. NIEIR (National Institute of Economic and Industry Research), 2003, *The Economic Impact of Gambling*, July.

The size and complexity of this report combined with its release time over the Christmas period and with a comparatively short deadline has restricted the AHA's capacity to comment on this document. Accordingly the AHA makes no additional comment at this stage.

Yours sincerely,



Charles Shields
Gaming Manager



Paul Dirou
AHA Sub Committee