

24 October 2003



MAYOR'S OFFICE

Mr Thomas G Parry
Chairman
Independent Pricing and Regulatory Tribunal of New South Wales
PO Box Q290
QVB Post Office
NSW 1230

Dear Sir

REVIEW OF GAMBLING HARM MINIMISATION MEASURES

As you are aware the Gaming machines Act 2001 allows clubs and hotels to make a Social Impact Assessment (SIA) Class 2 application for gaming machines to be installed upon their premises. The Act also allows Councils the opportunity to submit social impact assessments in relation to each application. Such assessments can address how an approval for gaming machines has an overall economic and social impact on the community.

However, it has recently come to Council's attention that applications for increases of four (4) or less gaming machines in a three (3) year period by any particular club or hotel under an SIA Class 1 cannot effectively be objected to by Councils unless Councils can demonstrate how the existing gaming machines in any premises are conducted in a manner which breaches the provisions of the gaming Machines Act. As Councils do not have the resources to monitor gaming machines and their use, it is impractical for Council to therefore lodge an objection for applications for four (4) or less machines.

Councils do not have an opportunity to comment on the social and economic impact of these applications for four (4) or less machines. But several applications for four (4) or less machines across all clubs and hotels in an area can have an overall significant impact. In Dubbo, for example, if each registered club and hotel applied for four (4) additional gaming machines this would total eighty (80) new machines.

This differential treatment of small and large applications is incongruous with the fact that one (1) application for five (5) new gaming machines can be subject to a full social impact assessment but not collective applications totalling a possible eighty (80) new machines.

Accordingly I submit that the accumulative effect of additional gaming machines be given consideration in Class 1 Social Impact Assessments, with special consideration to be given to Regional Centres such as Dubbo, Wagga Wagga, Tamworth.



I also submit that letters of notification of applications together with an invitation for submissions be sent to local authorities and local organisations including but not limited to these listed below thus allowing appropriate community groups and the wider community the opportunity to comment on the social aspects of such increase to gambling opportunities.

- Local Government
- CDSE Committee Chairperson
- Area Health
- Dept of Housing
- NSW Police (C.C. Area Commander)
- Local Private and Public Schools
- Local Charitable organisations
- Local Churches
- Local Service clubs
- Chamber of Commerce
- Gambling Counselling Service

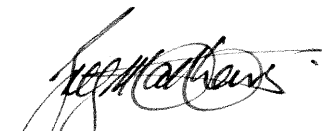
As part of the abovementioned notification process the number and location of current gambling machines need also be supplied to the local agencies.

It is also vital that in determining all Social Impact Assessments the board address all submissions and provide written comment on its consideration of the submissions.

Additionally I would submit that an appeal process be available that would enable Councils to formally appeal against the gambling regulators ruling. This I believe should be based on the legislated model of the Victorian Civil and Administrative Tribunal (VCAT).

In conclusion I would like to state that the issue of gambling and its significant detrimental impacts on families and individuals requires Council to have the right to comment and make opinions on all applications for additional gaming machines.

Yours faithfully



Councillor Greg Matthews
Mayor