



12 December 2003

Dr Thomas Parry
Chairman
Independent Pricing and Regulatory Tribunal of NSW
PO Box Q290
QVB Post Office NSW 1230



Dear Dr Parry,

Re: Supplementary Submission to IPART Review into Gambling Harm Minimisation Measures

On 16 October 2003 the NSW Gaming Industry Operators (“GIO”) commissioned the University of Sydney to update its worldwide literature review of harm minimisation completed as part of previous research. The GIO appreciates the opportunity to provide this supplementary submission, including the attached report from the University’s Gambling Research Unit, to IPART’s Review into Gambling Harm Minimisation Measures.

The GIO reiterates the view expressed in its submission of 14 November 2003 that the “harm minimisation” pendulum has simply swung too far in terms of reliance on unproven technical measures that are only ‘thought’ to be ‘likely’ to assist problem gamblers.

The GIO notes the University of Sydney comments on page 13 of its research report that “...the nature of the act of gambling in its own right does not expose the individual to any risk of personal or health-related harm”. The GIO considers that this reality dictates that government policy should focus on positive responsible gambling programs which foster the enormous contribution made by GIO members to the economy and communities of NSW.

The GIO accepts the University of Sydney comments on page 16 of its research report that “Any responsible gambling program rests upon two fundamental principles: (1) the ultimate decision to gamble resides with the individual and represents a choice, and (2) to properly make this decision, individuals must have the opportunity to be informed.”

In particular, GIO members have considered the University of Sydney comments on page 61 of its research report that *“It is particularly important that efforts at prevention are demonstrated to be efficacious and subsequently effective. It cannot be assumed that a program aimed at prevention is helpful, or even that well-intentioned programs are not harmful.”*

The GIO respectfully reiterates its request that PART recommend that the existing and proposed “technical measures” which cannot be shown to have any material positive impact on problem gambling in NSW be discontinued or not proceeded with as such measures impact negatively on recreational players. The GIO supports ‘evidencebased’ measures which can be shown to impact positively on problem gamblers without impacting negatively on recreational players.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ross Ferrar', with a stylized flourish at the end.

Ross Ferrar
for NSW Gaming Industry Operators group