

## **Productivity Commission Inquiry into Australia's Gambling Industry**

**Supplementary Submission by Charles Livingstone Ph.D. (Department of Health Social Science, Monash University), Richard Woolley Ph.D. (Centre for Industry and Innovation Studies, University of Western Sydney)**

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### **Purpose of this submission**

We note that submission number 201 to the Commission's current inquiry into Gambling, from the Australian Gaming Technologies Association (GTA), is directed towards a critique of certain relevant work undertaken by Livingstone and Woolley (*et al*). The GTA submission focuses in particular on the article 'Risky Business: a few provocations on the regulation of electronic gaming machines' (2007) which appeared in *International Gambling Studies*, 7 (3) 343-358, and a report commissioned by the Independent Gambling Authority of South Australia 'The Relevance and Role of Gaming Machine Games and Game features on the Play of Problem Gamblers' (2008), Independent Gambling Authority South Australia, Adelaide. Accordingly we wish to briefly respond to this critique.

### **Description of attachment**

We have already addressed the criticisms of the GTA in other proceedings, notably the recent inquiry conducted by the Community Affairs Committee of the Australian Senate into certain bills focused on the regulation and taxation of electronic gaming machines and on the availability of automatic teller machines in or near premises used for gaming machines.

Accordingly, we direct the Commission to our response to the criticisms made by GTA and their consultants, provided as a submission to that inquiry. This submission is available at

[http://www.aph.gov.au/Senate/committee/clac\\_ctte/poker\\_machine\\_harm\\_reduct/submissions/sub23d.pdf](http://www.aph.gov.au/Senate/committee/clac_ctte/poker_machine_harm_reduct/submissions/sub23d.pdf)

For the convenience of the Commission we append a copy of that submission as an attachment to this submission.

That attachment incorporates a copy of a letter to Charles Livingstone from the Independent Gambling Authority of South Australia addressing aspects of the submissions by GTA (then AGMMA) to the Senate Committee's inquiry. This letter addresses certain of the criticisms levelled by GTA at the report we prepared for the Authority, and in our view is relevant to consideration of the matters addressed by the current PC inquiry.

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*Department of Health Social Science, School of Public health and preventative Medicine, Monash University. 18 May 2009*