

Let us entertain you



23rd November, 2009.

Gambling Inquiry
Productivity Commission
GPO Box 1428
CANBERRA CITY ACT 2601

Dear Sir/Madam,

I am writing in response to the recent release of the draft report on gambling to convey the serious concerns of our Club and its members.

Kedron-Wavell Services Club Inc. ("KWSC") is a not-for-profit community club located in Chermside on the north side of Brisbane and was formed in 1969 as an amalgamation of two existing RSL clubs, Kedron RSL and Wavell RSL. The Club reports that the foundation members were determined to provide a sound financial community base for the long term development to the benefit of families in the immediate region.

KWSC has grown since 1969 and now has over 23,000 members.

The Club provides extensive social and entertainment facilities and services in addition to functions, dining, bars and gaming and include:

- Live entertainment (some at no charge)
- Day and night time shows
- Movie nights
- Family fun nights
- Children's activities
- Various members promotions, give-aways and raffles
- Internal clubs including:
 - Kids Club
 - Wine club
 - Travel club
 - Kedron-Wavell Ex Service Women's Association
 - Kedron-Wavell Services Hockey Club
 - Golf club
 - Amateur fishing club
 - Billiards and snooker club
 - Affiliated – Aspley Little Athletics
 - Kedron-Wavell RSL Sub Branch
 - KWSC Training (RTO National Training No. 31346) which provide accredited training for the hospitality industry).

In providing these facilities and activities, visitations to the Kedron-Wavell precinct culminate to approximately one million people per year.

We currently employ 113 casual, 26 part-time and 70 full-time employees and through the welfare arm of the RSL Sub-Branch, an average of 55 hours per day are volunteered.

It is in the Club's best interest to ensure that our gaming services are conducted in a responsible manner. We are committed to the Queensland Responsible Gambling Code of Practice and are very much aware of our obligations and responsibilities to people who may have a gambling problem.

While we welcome the gambling inquiry believing it was long overdue, we are extremely concerned about the negative impact that the draft findings and recommendations would have on the financial viability of our Club and therefore the community. It would be inevitable that jobs would be lost, the provision of services to our members curtailed and most significantly, a reduction in the level of community support.

In the 2008 financial year, KWSC contributed a total of \$1,533,079 in cash and in-kind support to the community. This went towards a range of projects in areas of sport and recreation, community welfare, health and medical research and education.

It is imperative that the Productivity Commission give serious deliberation to the practical reality that the draft recommendations will impose on community clubs. Under no circumstances will we be able to sustain the high level of community support that is currently afforded and in turn this will have a dire affect on those many organisations that look to community clubs for their sustainability.

To put the severity of these recommendations into perspective, a viable option for the Club would be to disband our organisation which in turn will have a domino effect throughout the community thus leaving our members and the local community without the much needed services and facilities that are made possible through community gaming.

It is in consideration of the above that we insist that the Productivity Commission thoroughly contemplate the obvious issues that will definitely prevail based on the draft recommendations to date. Further, it is necessary that the Commission consider the following key points when completing the Final Report:

- With the implementation of wide-ranging actions throughout Australia since 1999, problem gambling has declined across Australia. In Queensland alone, this now stands at 0.47% of the adult population – measured through one of the largest surveys of its kind in the world.
- The Commission must utilise firm data and not estimates to ensure that effective policy is reached. The Commission must therefore gather nationally dependable and consistent research so that an exact and factual insight can be had into gambling sector.
- It would be imprudent to attempt to group all community clubs in one model as there are different influences such as various regulations, tax rates, market maturity, ownership structure not to mention difference between private and community ownership.

- Gaming serves different purposes in different venues. For clubs which are not-for-profit entities, gaming is a community initiative, which supports a range of community services and facilities. It is critical that there is a strong demarcation between community gaming and for-profit or entrepreneurial gaming.
- While technological innovations open many possibilities for harm minimisation, it is critical that any technology is evaluated first and then, based on solid evidence, accepted or rejected. Queensland in this regard is far ahead with its card-based gaming trials. The same also applies to any policy change (ie. modelling to determine impact and effectiveness of the policy change before accepting or rejecting the policy platform).

In conclusion, we believe that the Productivity Commission must consider the needs of gaming venues and their patrons and in doing so work towards attaining a true and realistic approach to problem gambling. In the Commission's consideration, acknowledgement of the extensive gambling measures already in place must be calculated as must the imminent concept of personal responsibility so to put into perspective the limit to which restrictions can be placed on gambling venues.

In the event that the Productivity Commission choose to proceed with the draft recommendations, then the Commission needs to recognize both the severity and reality of its actions and should duly consider the plight of sport, welfare, charities and the like not to mention the significant demise of numerous community clubs. The social and economic lost will be so far-reaching that Government's will be unable to replace the facilities currently provided or supported by community clubs.

We again wish to reiterate our support of responsible gambling within Australia, however, it is imperative that a 'true' result be gained from the Commission's investigations and that this 'true' result be the basis of the Commission's Final Report. The Commission's findings should also reflect the seriousness of problem gambling within other modes of gambling such as internet gambling whereby regulation would be practically impossible to impose.

We trust that our response to the Draft Report will be duly considered and that our real concerns will be investigated with the responsibility as bequeathed to the Commission. This Commission into Gambling is the nation's opportunity to gather the vital information required to understand both the positive and negative attributes of gambling in our society and it would be irresponsible of us as both regulators and an industry to not conduct this investigation correctly utilising all the resources available to us.

We thank you for your consideration of the above and are available to discuss any matters pertaining to this issue.

Yours sincerely,



Chris Sartori
Secretary/Manager