



Friday, 20 November 2009

Gambling Inquiry - Draft Report
Productivity Commission
Locked Bag 2, Collins Street East
MELBOURNE VIC 8003

Dear Sir,

RE: CLUB RESPONSE TO THE DRAFT REPORT ON GAMBLING

I have been asked by the Management Committee of my Community Club to convey the serious concerns of our club and its members on your Draft Report on Gambling.

Our club is situated in Norville, Bundaberg. The main objective of our club, as stated in our Constitution, is to provide and maintain a clubhouse, sporting grounds and equipment for club members for the benefit and social comfort of such members. We currently own two football fields, two rugby league fields, two bowling greens, a bocce drome, two tennis courts and two cricket nets. We have a licensed clubhouse situated next to the fields, however our main clubhouse is situated in another location a couple of blocks away. Approximate numbers of our affiliated Sub Clubs (sporting and other) are 650 senior members and 900 junior members. Our affiliated Sub Clubs are also assisted by numerous volunteers throughout the year.

We currently employ 26 casual, 20 part-time and 33 full-time employees and the club strongly supports local community businesses when products and services are required.

We have a total of 19 Life members, 700 Ordinary members, 13,000 Social members and 420 Junior members.

It is in our interest and that of our community to ensure that our gaming services are conducted in a responsible manner. The club is always vigilant in ensuring that it complies with the Queensland Responsible Gambling Code of Practice and we are vastly aware of our obligations and responsibilities to people who may have a gambling problem.

While we welcome and support the gambling inquiry, we are very concerned about the negative impact that the draft findings and recommendations would have on the financial viability of our club as this would most likely impact our ability maintain our staffing levels, services we currently provide to our members may become restricted and may see a reduction in our community contributions, including donations to the community and our support of local businesses for products and services, therefore creating a flow on affect of their ability to maintain staffing levels.

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In the last financial year, the club invested in excess of \$700,000 in cash and in-kind support to local community groups and sporting clubs. Community gaming at our club greatly contributed to the club being able to provide this level of support for community contributions. If adverse measures such as those contained in the Draft Report are placed on community gaming, the club will not be able to continue this level of community support.

The harsh reality for our club and our community would be our club having to close its doors, leaving our members and the local community without the much needed services and facilities that is made possible through community gaming. This may then affect local organisations and sporting clubs to be able to survive, as more pressure will be placed on them to find alternate avenues to raise funds, which will then increase the pressure on their volunteers to be able to sustain the organisation or sporting club.

We urge the Productivity Commission to seriously consider the practical reality of their recommendations. In particular, we urge the Productivity Commission to consider the following when completing its Final Report:

- The rate of problem gambling has declined across Australia because of the extensive measures that have been implemented since 1999.
- We need firm data, not estimates, to build effective policy. Therefore, nationally consistent research is needed if there can be a 'true' understanding of the gambling sector. A 'one size fits all' approach is not possible because each State is different, with different regulations, tax rates, maturity of market, ownership model and splits between private and community ownership of gaming.
- 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 cards-based gaming trials. The same also applies to any policy change (i.e. modelling to determine impact and effectiveness of the policy change before accepting or rejecting the policy platform).

Finally, our view is that the Productivity Commission should strive to achieve a balance in the Final Report between the needs of gaming venues and their patrons (of whom only a very small number have a gambling problem). There should also be an acknowledgement of the extensive responsible gaming measures that are already

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in place (many of which have produced spectacular positive outcomes). Some attention should also be given to the concept of personal responsibility as there is a limit to which controls can be placed on gambling venues.

Should the draft recommendations remain unchanged, the Productivity Commission may like to consider how sport and the considerable support for welfare, charities and the like will be funded, as it is highly likely that community clubs will not be in a position to provide their current level of support. In fact, we would expect the demise of a significant number of community clubs should all the recommendations be taken up by respective Governments throughout Australia.

I hope the above is of some assistance in understanding the nature and importance of gaming in community clubs and the impact the draft recommendations may have on community gaming.

Yours sincerely,

Brendan Royall
GENERAL MANAGER

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