



*The Returned & Services
League of Australia
(Qld Branch)
Townsville Sub-Branch Inc.*

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16 November 2009

Gambling Inquiry – Draft Report
Productivity Commission
Locked Bag 2, Collins St. East, Melbourne,
VIC 8003

Dear Sir

Re: Club Response to the Draft Report on Gambling

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

The Townsville RSL is situated in Hermit Park. The principal purpose of our existence, as stated in our Constitution, is to provide welfare for our members, their families and the wider veteran community, and where possible, foster the development of the nation's youth, ensuring proper commemoration of the proud history of our service men and women and to provide a safe haven for the maintenance of camaraderie and mateship.

We currently employ 53 casual, 5 part-time and 43 fulltime employees. We also use the services of at least 10 volunteers on any given day.

At present we have a total of 18,206 members comprising of 1820 Service/League members. Our members visit the club for a range of services and facilities. Apart from gaming, these mainly include socialisation, dining and entertainment. Our gaming facilities include 222 poker machines, a 3 Keno outlets and a Club TAB outlet.

It is in our absolute interest to ensure that our gaming services are conducted in a responsible manner. We subscribe 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. All Senior Management and Duty Managers are trained Customer Liaison Officers and all fulltime gaming staff have completed Customer Liaison Officer training with the aid of our local Gambling Help provider (Centacare) who are invited to attend the training sessions.

While we welcome the gambling inquiry, as it was long overdue, we are very concerned about the negative impact that the draft findings and recommendations would have on the financial viability of our club. This would almost definitely result in loss of jobs, curtailment of services we currently provide to our members and, most importantly, a reduction in our community contributions.

In the last financial year, we returned a total of \$666,749.66 in cash and in-kind support. This went towards a range of projects, including \$300,000 for the construction of "Anzac Lodge" which is used for subsidised accommodation for out of town veterans or their families when they require medical treatment in Townsville. Other RSL Affiliated Groups that receive benefit include, Legacy, National Serviceman's Association, Women's Auxiliary, War Widow's Guild, Total & Permanently Incapacitated, Probus, Rotary, Crimestoppers, Junior AFL, Prostate Support Group, Laurel Club, 31st Battalion and Ex POW's to name a few. The Townsville RSL also provides a Free Courtesy Bus for local community groups to use for their functions and outings.

There is no way we can sustain this level of community support if adverse measures such as those contained in the Draft Report are placed on community gaming. The harsh reality is that without our support a lot of the above groups would not be able to continue the great work they do in the community. The club itself may also be forced 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.

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 finalising its Final Report:

- The rate of problem gambling has declined across Australia because of the extensive measures that have been implemented since 1999. In Queensland, this now stands at 0.47% of the adult population – measured through one of the largest surveys of its kind in the world.
- 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 private and community ownership of gaming.
- While technology 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 platform policy).

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

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

Karla Malouf
General Manager