



18 December 2009

**By email: [gambling@pc.gov.au](mailto:gambling@pc.gov.au)**

Ms L Sylvan, Mr G Banks and Mr R Fitzgerald  
Commissioners  
Productivity Commission  
Gambling Inquiry  
GPO Box 1428  
Canberra City ACT 2061

Dear Commissioners,

**Australian Productivity Commission Draft Report on Gambling**

The Financial and Consumer Rights Council (**FCRC**) welcomes the Productivity Commission's draft recommendations released on 21 October 2009. This letter aims to respond to the draft recommendations and make further comment where necessary.

The FCRC is the peak body for Financial Counsellors and community based organisations in Victoria who are concerned with the rights of low income and vulnerable consumers. We are an independent not-for-profit organisation which is primarily funded by the Department of Justice and have been in operation since 1996.

Amongst other things, we provide a support network for 200 member Financial Counsellors, primarily through ongoing training, education and professional development seminars and policy development. Additionally, the FCRC is active in promoting the rights of consumers and seek to achieve this by the provision of consumer information and community education, as well as effective casework support and advocacy.

Approximately 25% of Financial Counsellors in Victoria provide specific Problem Gambling financial counselling services. We also lead a joint problem gambling working group with the Council of Gamblers Help Services, and problem gambling policy issues form a key part of the FCRC policy agenda.

We strongly support the recommendations made by the Productivity Commission in the Draft Report on Gambling (**Report**).

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It is pleasing to see a national approach to problem gambling, however we would like to suggest that the recommendations made in *Chapter 7 Pre-commitment strategies*, be incorporated at a national level, with national databases.

We are concerned that state-wide self-exclusion databases do not have enough scope and potential to adequately curb problem gambling for those who live in border towns. There should be a nation-wide self-exclusion database, which in conjunction with the other clauses detailed in the Chapter 7 recommendations, can restrict the ability of problem gamblers self-excluded in one state from being tempted to gamble in another state – especially if the distance is relatively short.

For example, a consumer who opts to self-exclude in Mildura, Victoria would only have to travel a mere 2 kilometres to have access to gaming facilities in Buronga, New South Wales. This example can be seen in many border towns on the Victoria/New South Wales stretch of the Murray River, and it is essential that self-exclusion programs cater for consumers who live in these areas.

In regard to *Chapter 15 Gambling policy research and evaluation*, particularly *Recommendation 15.3*, we strongly suggest that a national centre for gambling policy research and evaluation be established in place of Gambling Research Australia. We prefer this option over *Recommendation 15.4* which proposes to have the Department of Families, Housing, Community Services and Indigenous Affairs administer the work of Gambling Research Australia. A national research body should be relatively independent from Government, and it is imperative that policy and research work be undertaken not only at the request of Government, but importantly, initiated by the research body itself.

The independence of the national research and evaluation body is essential to ensure that Australian gambling policy and knowledge has a solid standing both nationally and internationally.

We thank the Productivity Commission for its work on the Report, and we are encouraged by the recommendations. The societal impacts of gambling can't be overlooked, and a strong national approach to combating problem gambling and its consequences is necessary. The effects of problem gambling are enormous, and at the very least must be examined as part of the Government's Social Inclusion policy. Problem gamblers and their families face significant financial hardship, familial breakdown, mental health issues and even criminal interventions if a strong, national and inclusive approach is not adopted.

We look forward to the release of final report on gambling and the recommendations enclosed within.

Should you have any questions regarding this submission please contact Kristen Gobbo at FCRC on (03) 9663 2000.

Yours sincerely,



**Kristen Gobbo**  
Policy Officer



**Richard Foster**  
Chief Executive Officer