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Mr G Banks, Mr R Fitzgerald & Ms L Sylvan
Commissioners
Productivity Commission-Inquiry into Gambling
Via email : (gambling@pc.gov.au)

Community Clubs Association of Victoria

Submission to the Productivity Commission's Draft Report on Gambling

Thank you for the opportunity to comment on the Productivity Commission's Draft Report on gambling.

Our organisation

Community Clubs Association of Victoria is a not-for-profit industry peak body representing the interests of not-for-profit community clubs. Our guiding philosophies include belief in the positive effect clubs and club life each have on local communities. We support a sustainable club industry that builds and creates social capital and infrastructure, that creates and sustains economic activity, and that creates both tangible and intangible benefits for the communities represented by its members.

Across Victoria, licensed not-for-profit clubs offer their members excellent facilities, sporting competitions, social opportunities, food and beverage service, and general entertainment that includes various forms of gambling, principally wagering and betting on racing and sports events, and gaming machines. The income resulting from gaming and wagering as well as income raised from other sources (membership fees, bar revenue sponsorships for sporting teams, catering and functions, etc) is used to support the principal purpose of the community club.

Our interest in the Commission's Draft Report

Our interest in the Commission's findings and recommendations stems from concerns for the viability of clubs' businesses should continual restructure and restriction on providing gambling services reduce demand by the vast majority of customers who gamble responsibly. Should that situation arise, and we believe it likely should some of the Commission's recommendations be implemented, the activities that our member clubs undertake in their communities will be reduced

or curtailed, without necessarily generating any benefit to people with problematic gambling behaviour.

Our philosophy and central theme in this response to the Draft Report

We argue for a responsible, sustainable gambling industry that is based on a principle of mutual responsibility. This requires providers of services to act responsibly and serve all customers accordingly, and customers in turn to consume the products and services responsibly with regard to the potential negative effect that their gambling may have on themselves and their families. We believe that there has been a too-ready acceptance of the notion that the only way to look at gambling services is through the prism of potential harm to possibly-at-risk-of-problem-gambling customers while discounting the effect that unproven technological restrictions may have on the legitimate enjoyment of gambling by the vast majority of consumers. Damaging behaviour is just that – behaviour – and attempts to limit or control its consequences through increasing technical intervention in and restriction of the responsible enjoyment of others is likely to have undesirable consequences while not addressing the causes of the behaviour.

We support efforts to reduce the faulty cognitions that underpin loss of control by gamblers; however in this regard, we reject that total regulation or restriction will ever be effective. Australians should be free to make rational choices about their consumption behaviour based on understanding and knowledge. Government through regulation and gambling service providers through venue activities should jointly be responsible for making proper information available to consumers.

Thank you for the opportunity to place our response before the Commission. Our submission relative to specific Draft Findings and Recommendations follows.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Leon Wiegand', with a stylized, cursive script.

Leon Wiegand
President

Responses to particular Findings and recommendations

Draft Finding 3.1

Even under conservative assumptions, a sustained 10% reduction in the costs associated with problem gambling is estimated to generate benefits to society of around \$450 million a year in 2008/2009 prices, and longer term benefits amounting to several billion dollars. This implies that even harm minimisation measures with modest efficacy may produce worthwhile benefits so long as they do not also involve excessive costs

In the Terms of Reference, the Productivity Commission was asked to discuss the economic and social impacts of gambling industries in Australia along with the interrelationships with other industries.

The Commission acknowledges economic impacts created by industry; however it appears that only negative social impacts have been considered. This ignores the tangible and intangible **social and community benefits** that have been accrued with significant development of clubs. This has provided community members of all ages who might not have otherwise had a chance, with opportunities to participate in a variety of sporting groups, social activities or interactions. Gaming revenues have underpinned these developments and the resultant social benefits.

Nor does the report seem to acknowledge the provision by clubs of meeting and function facilities for local community groups, (Rotary, Probus, Wheelchair Athletes, University of the 3rd Age etc) and other not-for-profit organisations. Further, many clubs make annual donations to local schools and kindergartens, the type of social /economic benefits not captured in any research or reporting.

IPART also concluded:

‘Clubs also provide considerable intangible social benefits that are impossible to quantify but should not be ignored. These include the sense of belonging that some club members feel and the greater social cohesion a community might experience as a result of having a club where people can meet and mix.¹

The Commission suggests (page 3.12) it could be argued that concessional treatment of clubs could have been replaced with governments using forgone revenue to fund services valued by the community. CCAV doubts the general community would trust governments to deliver services at the same level and may be wary that over time, such tax revenue might be re-directed to other areas. This argument also takes the power and decisions away from local communities to create their own recreational facilities.

Another relevant consideration is that in Victoria, clubs do not have “greater entitlements to EGMs” and with equal supply enjoy less than half the revenue of hotels. Any re-balancing of the tax take

¹ IPART New South Wales, Review of the Registered Clubs Industry in NSW June 2004

from gambling in clubs will have an immediate effect on clubs' ability to provide the services and amenities referred to above.

The report describes the difficulty in establishing evidence-based gambling policy (page 3.23) and expands on the associated difficulties. As participants in the Victorian gambling industry over the past 19 years, our member clubs have needed to comply with continual stream of new responsible gambling legislation. Many of these initiatives, such as minimum luminance levels, clocks, warning messages on machines etc., seem to have come from the "Why don't we try...?" school of thought, rather than from any evidence-based consideration. They have imposed costs without providing any quantifiable mitigation of problem gambling.

CCAV does not dispute the need for sound policy to provide protection for problem gamblers. We are wary however of the landscape being so cluttered with intuition-based or ineffective protection measures that club managers and staff are unable to fully comply with and concentrate on those measures that do offer support and protection for those patrons at risk of developing problems.

Almost all of the mitigation measures proposed by the Commission rely on effective implementation at venue level. Achieving effective implementation by venue management and staff is generally a matter of engagement. Where measures to mitigate harm are understood and recognised for their effectiveness, they are embraced by club Boards, managers and staff. The Victorian voluntary self-exclusion programme is one such measure. It is easily understood by staff in clubs, and its benefits to adoptees is clear. Notwithstanding the complications inherent in such a system (in some clubs, with high numbers of excludees, there is the need for continual review of photographs), staff support it enthusiastically and intervene where breaches occur. In most cases this reinforces the member's decision to self-exclude and reduces recidivism.

Similarly, contact with and education by problem gambling support services is welcomed by clubs as managers and staff see clear benefits in the activities of those services.

Chapter 4 Prevalence

We do not seek to challenge any published data but note that evidence suggests that prevalence has fallen over time. The Commission appears reluctant to acknowledge the role industry (including support and counselling services), consumers, Governments or indeed itself for the part each sector has played in bringing this about. Given the observed decline in problem gambling numbers, it may be appropriate to (at least) stop to reflect on a job well-done.

Chapter 5 Counselling and Treatment

The report acknowledges the need to strengthen partnerships between counselling services and venues. CCAV endorses this direction and notes that such interaction was more recently mandated by the Victorian Codes of Practice. The experience of our members is that managers and staff feel empowered when strong links and two way information opportunities are established.

A case in point is the Mornington Peninsular Consultative Committee on Gaming which has been running for approximately 8 years. This group comprises representatives from local Gamblers Help, local church groups and gaming venues including some of our members. Meetings occur quarterly and the objective is to provide a forum to share information and discuss issues of concern. This is viewed as a positive experience by our club managers who feel they are able to better understand the issues Gamblers Help are dealing with whilst providing opportunities to demonstrate their venues commitment to responsible gambling.

Draft Recommendation 5.1

...

- *Place greater emphasis on campaigns that (i) highlight potential future financial losses associated with problem gambling and (ii) make the community aware of behaviours indicative of problem gambling, to encourage earlier help-seeking and interventions by family and friends*
- *provide information and a one-item screening test...targeted at high-risk groups...with subsequent evaluation of the effectiveness of this measure*
- *promote self-help and the option for brief treatments, as such ...interventions can increase self-recovery of people experiencing problems with gambling.*

CCAV supports this recommendation, and note its strong alignment to our central philosophy (expressed above) that there should be commitment to mutual responsibilities – on the part of providers and on the part of consumers.

Observation on Draft Finding 5.2

Outcome and client follow-up data following treatment, while limited, show significant decreases in clients' involvement ...and their gambling-related problems.

While this appears obvious, it is nevertheless a welcome finding, and it is hoped that support services are encouraged to go beyond superficial contact with clients, and that funding for effective contact is provided. It would benefit all in the industry if summary results of counselling and support were made available, and assessed against performance targets.

Draft Recommendation 5.4

Governments should ensure that existing funding mechanisms for help services are based on those gambling forms found to involve the greatest social harms.

In Victoria, clubs and hotels have equal access to gaming machine operations – there is no advantage to clubs in respect of supply. Therefore the EGM tax regime in Victoria that funds gambling support services cannot be equated to that in other states where clubs enjoy major advantages over hotels. The lower tax contribution in Victoria from clubs acknowledges their community services and benefits. Our comments under Draft Finding 5.2 are relevant here. Support services should be properly funded and should report their performance against targets. CCAV believes it important to ensure that taxation in Victoria collected from the tax on hotel gaming revenues is directed in adequate quantities to ensure proper funding for effective gambling support providers.

Chapter 6 – Information and education

Draft Recommendation 6.1

Governments should draw on the Victorian model...maintain their effect

CCAV supports provision of gambling warnings that have been market-tested for effectiveness and that are assessed for effectiveness post-implementation. Their beneficial impact on at-risk gamblers is indicated by research. It should be recognised that the Victorian model imposes costs on venues for the printing, distribution and maintenance of the materials.

Draft Finding 6.1; Draft Recommendation 6.2

CCAV supports school-based education programmes designed to increase understanding of responsible gambling and reduce gambling-related harm. We do not understand the Commission's reluctance to recommend such programmes when the model for an effective programme is expressed so clearly on p 6.24.

Draft Recommendation 6.3

As gaming machines and networks are replaced...provide player statements and dynamic warnings.

We offer a cautionary note here: every technological improvement or provision comes at a cost, which is always borne, ultimately, by the venue. In Victoria clubs are facing tremendous cost pressures as the industry makes the transition to a venue operator model. Clubs must meet the costs of purchasing a 10-year entitlement to operate gaming machines, purchase floor stock, as well as ensuring that they meet all regulatory and compliance obligations previously undertaken by the Licensed gaming Operators, Tattersall's and Tabcorp. Increasing the cost of gaming equipment will have an impact on the ability of clubs to meet these obligations, and it is likely that cost pressures may force some to withdraw from the business. This will be a win for no one, as communities will suffer from the investment in services and amenities that only clubs provide.

Draft Recommendation 6.4

Governments should ensure that gambling suppliers do not...(create)the false impression that future winning numbers can be inferred from past results. This should apply to all gambling suppliers...

CCAV supports this recommendation, which, again, is consistent with our central philosophy that gambling should be offered in a climate of mutual responsibility. Misleading information leads to uninformed (poor) decision-making, and is inconsistent with responsible gambling. As an aside, the greater problems here are the seemingly natural superstitions and erroneous beliefs held by humans. In this regard, cultural differences play no small part.

Chapter 7 Pre-Commitment Strategies

Draft Recommendation 7.1

Governments should modify existing self-exclusion arrangements so that:

- *Self exclusion applies to all venues in a jurisdiction triggered by a single simple application by the gambler concerned*
- *People who have self-excluded would be placed on a state-wide database*
- *Venue staff request identification from gamblers collecting cheques for major prizes. As in Victoria there should be confiscation of prizes won by persons shown to be in breach of self-exclusion orders.*

CCAV submits that voluntary self-exclusion arrangements should apply to all venues in a jurisdiction. Further we believe that self-exclusion processes should be exactly the same for each arrangement, making it easier for our clubs to understand and administer, and above all, more effective for the self-excluding customer. This would also make it more likely that staff moving between venues could and would comply with the required processes.

We do not agree with confiscation of prizes for self-excludees. This measure is likely to deter some people from taking up the programme. It plays to the gambler's psyche of avoiding any situation that may mitigate against value in their chosen gambling form.

Victorian clubs pay all prizes or accumulated winnings of more than \$1000 by cheque, for which payment positive identification is required.

Draft Recommendation 7.2

Governments should ensure that...gamblers have the choice of

- *immediately invoking self-exclusion...*
- *excluding themselves at a place outside...*
- *...being able to self-exclude through remote means*

We support Draft Recommendation 7.2; every effort should be made to present a voluntary self-exclusion option that is convenient and immediate.

Draft Recommendation 7.3

Governments should ensure a more coherent approach to...self-exclusion...

- *...a minimum six months*
- *...able to reverse their (self-exclusion) agreement within 24 hours*
- *agreements for less than three years cannot be revoked until at least six months after their starting date, while agreements for periods of more than three years cannot be revoked until at least one year after their starting date*
- *revocation only be permitted after evidence of ...counselling*

- *...after a successful application (for revocation), face a period of up to three months before it takes effect*

CCAV supports the thrust of this Draft Recommendation except for the application of a successful revocation. For the reasons mentioned above, this measure may prove counter-effective. The application of a successful revocation should be the mirror image of the cooling-off period at the start of the Agreement period.

Draft Recommendation 7.4

Governments should implement...a universal pre-commitment system for gaming machines...

CCAV supports the implementation of voluntary pre-commitment systems to assist gamblers to control or reduce their gambling expenditure, while preserving the enjoyment of gambling for those not desirous of such change. The most effective system is one that gamblers choose to use (opt in), because it is responsive to the wishes of the individual, rather than being an unwanted restriction on behaviour.

The Commission is clearly predisposed to a compulsory (opt out) pre-commitment system, to the extent of invoking parallels from Greek mythology. Our view expressed in similar vein is that Ulysses, notwithstanding his reputation for trickery and deceit, should nevertheless have been able to have access to the knife to cut his bonds should he have so desired. After all, the ship may have been swept toward rocks by the current. Faced with impending doom, he is most likely to have made an appropriate decision to take control and avoid peril.

It should be noted that Victorian clubs are much smaller than many interstate counterparts. Member/ customer identification is readily established through sign-in, and staff generally have good knowledge of the people gambling in the club.

Chapter 8 Venue Activities

Draft Recommendation 8.1

Governments should enhance existing compliance and complaints handling arrangements by:

- *Enabling their gambling regulators or accredited compliance auditors to regularly appraise gambling venues' compliance with harm minimisation measures, both mandatory and voluntary, and publicly report their findings*
- *Introducing a mechanism for gamblers and venue staff to make complaints to the relevant gambling regulator about venue conduct contributing to problem gambling. The mechanism should be promoted to gamblers within venues and to staff through their responsible gambling training*
- *Enabling their gambling regulators to publish annually the number and nature of complaints about a venue, the action taken and where the complaint is substantiated, the name of the venue.*

CCAV believes the inspection and compliance regime in Victoria serves as an excellent model. The Victorian Commission for Gambling Regulation has encouraged venues to achieve compliance within a climate where it is known that repeat breaches invoke penalties and are made public. Public outing of non compliant venues should only be considered for serious breaches. In Victoria, where warning messages are displayed on gaming machines, patrons regularly remove the cards. In some cases patrons jam the cards into the coin mechanism to denote a reserved machine, even when machine reservation cards are available. Independent auditing conducted by the gaming operators has sighted such behaviour. This indicates the need to ensure that the cause of any non compliance is clearly understood before public reporting can occur.

The report notes an inherent conflict facing a venue balancing their voluntary responsible gambling measures against commercial imperatives. CCAV strongly believes the commercial difference between clubs and other licensed premises means that such conflict is not an issue for clubs. Revenue from problem gamblers is not sustainable and not desired by our member clubs. The cited examples from Professor Hing are so far from the reality of Victorian clubs as to be implausible in this environment.

On page 8.4, the report describes a situation where many Codes were developed by the gambling industry either alone or in isolation of other stakeholders. Interestingly this statement does not disclose its source which should be done in the final report. CCAV staff and consultants who have been involved in the development of most Victorian gambling codes through gaming, wagering and lotteries, believe this is likely to be opinion rather than factually based. It is our experience that active collaboration was involved in our codes development.

When discussing venue code compliance (commencing page 8.12), we alert the Commission to the danger of accepting at face value, compliance/ non-compliance figures and observations from agencies or groups known to be opposed outright to gambling. It is our experience that there are examples of 'anti gambling auditors' who:

- have never previously entered gaming rooms so do not understand what to look for
- do not understand where to locate required collateral
- do not understand intent of codes.

Any such auditing needs to be conducted by trained auditors, not participants with an already skewed opinion against the product.

The report addresses problem gambler identification by staff and intervention in venues. As noted, the exact visual clues and behaviours are not universally accepted and care needs to be taken when establishing standards that require 100% staff compliance. However, identification of some of these behaviours is now included in Victorian Responsible Gaming training.

CCAV believes that more research needs to be undertaken, taking into account attempts of recent codes to strengthen this area of problem gambler protection. Industry consultation on the subject in Victoria has rarely resulted in consensus. Most disagreement revolves around;

- the ability to identify behaviours as solely relating to gambling problems
- adequately describing particular behaviours of problem gamblers in a manner that young and in-experienced staff will be able to identify.

CCAV also believes that a more effective intervention program might be achieved by ensuring gaming venues have defined escalation processes. This may for example involve gaming /wagering/lottery staff notifying more senior/experienced managers or third party agencies to assess each situation as it arises. This may just be an issue that is not most successfully dealt with by a 'one size fits all approach'.

Draft Recommendation 8.4

Governments should prohibit venues from offering inducements that are likely to lead to problem gambling, or are likely to exacerbate existing problems, including offering free alcohol or food to a patron who is gambling.

We agree with prohibiting inducements but question the inclusion of food and non-alcoholic drinks. As a service to members, clubs frequently provide complimentary morning or afternoon tea to all licensed areas of their venues, perhaps a legacy of responsible alcohol initiatives before it was called that. Staff members roaming gaming areas with complimentary food, offering tea and coffee, provide an opportunity to customers for a break in play and interaction with that staff member. The meagre size of such complimentary snacks would not provide adequate satisfaction to act as a meal replacement for someone wishing to extend gaming machine play. Providing food, albeit by way of snacks, has two additional benefits, viz., enhancing self-respect in the player through acknowledgement of their role as a customer, and helping customer/s avoid disorientation of time and space through becoming fixed on the gaming machine.

In the interests of customer welfare, the definition of inducements must be amended to exclude food and non-alcoholic beverages.

Chapter 9 Access to Cash and Credit

Draft Recommendation 9.1.

Governments should fine tune existing regulations of ATM/EFTPOS facilities by introducing the following changes in gaming venues:

- *Cash withdrawals from ATM's/EFTPOS facilities should be limited to \$200 a day.*
- *ATM's/EFTPOS facilities should be a reasonable distance from the gaming floor, visible to the public and venue staff, yet not to gamblers from the gaming floor*
- *Warning and help messages should be clearly visible on ATM's/EFTPOS facilities.*

This is an emotive topic for which most of the research appears to be based on opinions and attitudes rather than evidence. The Victorian restriction from 2010 of \$400 cash withdrawals from ATM's in Gaming venues (9.6) would seem to offer an ideal opportunity to establish some robust research findings.

Given the 2012 ban on ATM's from Victorian gambling venues, our feedback more generally relates to EFTPOS. Suggesting a limit on EFTPOS cash withdrawals be limited to \$200 per day will create many problems for our clubs and their patrons. Our clubs are multi faceted providing services beyond gambling.-memberships, bistros, bars, entertainment are currently also paid via EFTPOS cash withdrawals as well as normal EFTPOS transactions.

If the aim is to provide problem gamblers and at risk gamblers a cooling off period, then limiting each transaction to \$200 cash withdrawal such as exists in Victoria is a more realistic goal. This is less likely to inconvenience the vast amount of our patrons, not at risk of developing gambling problems. In the smaller environments of most Victorian Clubs, patrons will be more likely to be self conscious about making multiple visits to withdraw maximum amounts. This solution does however impose a higher transaction cost on both the patron and club, but benefitting the banking industry.

It would be even more effective to establish mechanisms where gamblers can, through their banking provider, impose a limit or ban from certain EFTPOS terminals. There has been little pressure on the banking industry to develop such systems, however once created, such a logical approach could be linked to self –exclusion programs and counselling outcomes. The banking industry appears to claim system limitations which seem incongruous with many of their other developments such as mobile banking.

Chapter 10 Accessibility of Gaming Machines

Draft Recommendation 10.1

Drawing on the Queensland approach, governments should introduce a shutdown period for gaming machines in all hotels and clubs that commences earlier and is of longer duration than currently.

Victoria currently operates under a regime that requires our venues to operate for a maximum 20 hours in any 24 hour period (10.17). Venues may chose which 20 hour period is most appropriate based on their local region and club patrons, provided they have appropriate liquor licensing. This allows club members, who may have set recreational times available, to enjoy club services at their leisure. The flexibility for deciding which 4 hour period they will close must remain with the venues to cater for their own local environments.

Patrons using gambling facilities at less common hours are frequently shift workers or hospitality staff. The major effect of increasing the mandatory shutdown periods is likely to be encouraging people to visit the Casino, which is exempt from shutdown. The result will not be a reduction in gambling by problem or at-risk gamblers.

Chapter 11 Game and Machine Design

The Commission seeks feedback on the use of loss limiting machines as a harm minimisation measure. The underpinning logic of this request is that there may be a silver bullet solution to controlling gambling expenditure by re-designing gambling equipment, in this case, gaming machines. This view assumes that since human behaviour apparently cannot be changed, more and greater technological controls must be implemented until the desired level of control is achieved. It does not seem to matter that the benefit is unquantified, in all likelihood small, and the disbenefit to most players relatively greater. The Commission is attempting to make a popular product unpopular through engineering it to the point where it is more of a nuisance to recreational players than a recreation.

This flies in the face of the statement (p 11.27) that “Such an approach should not diminish the enjoyment of playing for anyone, merely the harm from doing so.” The measures suggested in Draft Recommendations 11.1 and 11.2 are reflective of this approach. CCAV rejects this position, and urges the Commission to consider that before any decisions would be made on what type of loss limiting mechanisms, if any, should be deployed the following would occur:

- Proper trial on the efficacy of such mechanisms
- Consumer research as to the impact the mechanism has on the entertainment value apportioned by recreational gamblers not at risk.

Draft Recommendation 11.3

Governments should ensure that gaming machine players are informed...

CCAV supports the provision of meaningful information relating to actual and potential spend for gaming machine players.

Chapter 12 Online Gaming

The Commission's support for the liberalisation of the current online gambling environment is puzzling and perplexing. These Draft Recommendations appear to be in conflict with the thrust of much of the Draft Report. Draft Recommendations elsewhere in the Draft Report recommend more stringent measures to reduce potentially harmful gambling behaviour, yet Chapter 12 seems a direct repudiation of that approach.

CCAV believes that the physical environment and social opportunity offered by clubs provides much greater protection against harmful behaviour and manipulation of customers than does the possible anonymity and impersonal environment afforded by online gambling.

In the club environment, gamblers are subject to greater scrutiny and intervention is much more likely in the case where a customer behaves in a way that indicates possible problem gambling. Clubs open 20 hours per day (or fewer), unlike the 24/7 environment of the online gambling operators.

CCAV believes the risks inherent in the online gambling environment outweigh any advantages liberalisation may bring.

Chapter 13 Racing and Wagering Developments

Racing has become a national activity, and it is clear that the time has come for a truly national approach to be adopted. The growth in business of non-contributing participants through online betting and corporate bookmaking has facilitated leakage of revenues from state racing organisations.

CCAV clubs offer wagering services to members and guests. Although margins are very tight, wagering nonetheless provides a service to members that makes the overall offer more attractive. CCAV believes that care must be taken to ensure Racing grows into the 21st century with a proper funding model that ensure the continuation of product to club outlets in a cost-effective way.

It is clear that changes in online betting, corporate bookmaking, offshore and interstate bookmaking have all contributed to make the 1950s funding model that exists today unworkable in any practical sense.

Draft Recommendation 13.1

The Australian Government should work with state and territory governments to develop a national funding model for the racing industry.

The key element of this model would be a single levy, universally paid on a gross revenue basis...

CCAV supports this recommendation in general (subject to the note below on turnover vs revenue) as it provides the best opportunity to date to prevent leakage and ensures the racing industry is compensated by all parties that benefit from use of its products. The only basis for determining fees, however, should be turnover, to eliminate leakage through discounts, cost allocation etc. The product fees payable to the racing industry should be a standard cost input for wagering service providers. A nationally applied schedule of charges applied without exception is the best way to ensure continued funding for the racing industry.

Should TOTE odds betting be offered by providers, then racing product charges should be the same as paid by totalisator operators.

Draft Finding 13.4

...inducements to wager..(are) not necessarily harmful

This Draft Finding seems to conflict all of the Commission's earlier Draft Findings and Recommendations about reducing potential harm to at-risk gamblers. We understand that the Commission has a view about wagering that differs from its approach to gaming machines. In any case, the existence of different standards and requirements relating to wagering indicates the need for a consistent national approach. Such practices should be allowed in all jurisdictions, or banned completely.