

SUBMISSION BY MARIBYRNONG CITY COUNCIL
TO THE PRODUCTIVITY COMMISSION INQUIRY INTO

AUSTRALIA'S GAMBLING INDUSTRIES

MARIBYRNONG CITY COUNCIL
PO Box 58
FOOTSCRAY VIC 3011

CONTACT: CHARLES LIVINGSTONE
RESEARCH AND POLICY OFFICER (MAYOR & COUNCILLORS)
PHONE: (03) 9688 0195
E-MAIL: charles.livingstone@maribyrnong.vic.gov.au

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1. INTRODUCTION

The aim of this submission is to provide an introduction to gambling issues as they relate to the City of Maribyrnong ("Maribyrnong"). In particular, the submission is focussed on issues associated with the growth of 'Convenience Gambling' - that is, the provision of increased opportunities for gambling within local communities at venues such as local clubs and hotels, usually through the use of Electronic Gambling Machines. The data and discussion contained in the submission is intended to assist the Productivity Commission Inquiry to develop an understanding of the impact of convenience gambling at the level of the local community, and from the perspective of a Local Government Authority ("LGA").

2. SUMMARY

- The introduction of Casino gambling and Electronic Gambling Machines (EGMs) into Victoria from 1992 was accompanied by a 258% increase (up to 1995-96) in the proportion of household expenditure devoted to gambling.
- By 1996-97 total losses to gambling in Victoria were \$2.76 billion, of which \$1.46 billion (~ 53%) was lost to EGMs.
- The current framework of regulation of EGMs provides for a State-wide cap of 27,500 EGMs (other than the 2,500 currently operated by Crown Casino). The non-Casino EGMs are split 50:50 between licensed clubs and hotels, and 80:20 between metropolitan and regional locations. As at 29 September 1998, there were 27,211 EGMs deployed at 561 venues throughout Victoria, as well as the EGMs operated by Crown Casino. This number of EGMs operated at average rates of return would imply annual losses to non-Casino EGM gamblers in the range of \$1.6 billion.
- Tax revenue derived from EGM expenditure is highly regressive. EGM gamblers earning \$200 per week are likely to spend about 250 times more as a proportion of income on EGM gambling than EGM gamblers earning \$1,200 per week.
- Maribyrnong City Council has been aware for some time of anecdotal reports from local welfare and community agencies about the impact of EGM gambling on demand for their services. Local traders have also increasingly provided anecdotal reports of decreased demand from consumers, attributed to the impact of EGM gambling.
- Maribyrnong has a very high proportion of low income earners (55.7%) and very high rate of unemployment (15.9% in June 1998). Both these data are the highest in the

Melbourne metropolitan area. Maribyrnong also has the highest density of EGMs in suburban Melbourne.

- There are very strong correlations between the data sets for both the proportion of low income earners, and unemployment rates, against EGM density by Local Government Area in suburban Melbourne.
- The greater the proportion of low income earners and the unemployment rate for a particular municipality, the greater the EGM density is likely to be. This may be attributable to the placement of EGMs being determined by the maximisation of return, coupled with the pattern of EGM expenditure by low income earners described above.
- Existing research indicates that, at least in its early phases, the large increase in gambling expenditure in Victoria after the introduction of EGM and Casino gambling was funded by a rundown in household savings. The implications of this for low-income households or communities require further research, but it may be hypothesised that, over time, the result is likely to be a decline in other consumption expenditure in favour of gambling expenditure.
- Losses to EGM gambling at venues within Maribyrnong are estimated in the range of \$44 million per annum (1996-97), or about \$45 per week per active gambler within the municipality (based on an estimate that about 40% of the adult population use EGMs at least annually).
- The costs of problem gambling in Maribyrnong are estimated at between \$9 million and \$36 million per annum additional to EGM losses.
- The upper range for direct employment generated by EGM gambling within Maribyrnong is about 140 jobs, of which an estimated 48 are full time.
- The powers of LGAs to regulate EGM venues are very limited. Planning approval from an LGA is not required if a venue proposes to operate EGMs within an area no greater than 25% of its licensed floor area. A recent amendment to all planning schemes (S70) promulgated by the Victorian Government permits licensed hotel or club venues in designated strip shopping areas to operate EGMs up to the same limit, also without a requirement for planning permission.
- The need for a range of micro-studies of the impact of EGM gambling on local areas has been highlighted by preliminary work undertaken by Maribyrnong City and other Councils. In particular, there is a need to develop a methodology to assess the extent of any relationship between EGM gambling expenditures and other local economic activity, particularly consumption expenditure.
- The Victorian Government has indicated that the existing cap on total EGM numbers will apply until at least 2000. Maribyrnong Council believes that a regional cap on EGM numbers should also be applied in addition to existing regulation. Council would also argue for the adoption by all venues of a Charter for Responsible Gambling, and for greater planning control by LGAs over the location of EGM venues, and EGM numbers.

3. BACKGROUND

Electronic Gambling Machines (EGMs), also known as poker machines, were legalised by the Victorian Government with effect from 1992. EGMs (other than the 2,500 located at the Casino) are allocated half and half to hotels and licensed clubs (Moreland City Council, 1998: 25.3). In 1991-92, 0.74% of household expenditure in Victoria was devoted to gambling, about half the Australian average. This represented the lowest average level of expenditure on gambling in Australia. By 1995-96, the proportion of household expenditure devoted to gambling had increased to 2.65%, higher than the then Australian average of 2.55%. This was an increase of 258%, well above the average Australian increase of 73.5%. By 1995-96, the per capita expenditure on gambling was about \$622 per year of which about 49% was attributable to EGMs, a State total for EGMs of \$1.25 billion out of a gambling total of \$2.55 billion (Victorian Casino and Gaming Authority ["VCGA"], 1997: 10-11). By 1996-97 the total outlay on gambling in Victoria had grown to \$2.76 billion pa, of which \$1.46 billion (52.9%) was attributable to EGM gambling. Apart from sportsbetting, which grew from \$2.26 million to \$2.33 million, EGM and casino gambling were the only areas of gambling expenditure to grow between 1995-96 and 1996-97, with growth, respectively, of 16.8% and 17.9%. All other forms of gambling declined (VCGA, 1997a).

Tax revenue derived from expenditure on EGMs is regressive - that is, people on low incomes spend proportionately more of their income on EGMs (and thus contribute more to tax revenues) than do higher income earners. Although it is very difficult to accurately gauge gambling expenditures, VCGA survey data indicates that individuals earning less than \$10,000 pa who use EGMs expend about 7.5% of their income on EGMs, those earning between \$10,000 and \$20,000 pa spend about 0.9% of their income on EGMs, whereas those on incomes of \$60,000 or more expend about 0.03% of their income on EGMs. However it is "well established that individuals under-report their gambling expenditure by approximately 100%" (VCGA, 1997: 46). In other words, very low income earners may, on average, expend as much as 15% of their income on EGMs. Those earning \$200 per week may therefore lose on average as much as \$30 a week on EGMs. These data indicate that a low income earner on \$200 per week or less who uses EGMs may spend, as a proportion of income, about 250 times the amount spent by someone earning \$1,200 or more per week (VCGA, 1997: 47-8).

Not all people play EGMs, however. VCGA estimates are that around 62% of all people have ever used EGMs. Women (64.5%) are more likely than men (60.6%) to have ever used EGMs. (VCGA, 1997: 164).

Research commissioned by the VCGA has indicated that the source of funding for the increase in gambling in Victoria has been a rundown of household savings. This is clearly a short term source of funds, and as savings are depleted the source of gambling funds is likely to be either a reduction in the proportion of income going to consumption expenditure, or a reduction in the proportion of income going to household savings, or both. VCGA conclude that "the introduction of EGMs is likely to result in a redistribution of income available for other activity, away from low income individuals and households" (VCGA, 1997: 165, 167).

It should also be noted that EGM gambling in local areas accounts for a very significant proportion of gambling activity. The VCGA study of inner city municipalities estimated that about three-quarters of the most recent gambling activity reported occurred at local venues, with the balance occurring at the physically adjacent Crown Casino. The VCGA study commented that “[t]he local nature of clubs and hotels enables them to be much better integrated into the lifestyle of the community, however it also brings the problems closer to home ... for most, problems with gaming were more associated with local venues” (VCGA, 1997: 4-5).

To date Maribyrnong City Council has had little control over the number or location of EGMs operating in the municipality. Applications for planning permission are not required for all such developments. Further, until recently, it was generally held to be the case that the grounds for consideration of any such applications as came before LGAs were limited to amenity. Recent decisions of relevant tribunals have expanded these grounds (see below) but LGAs continue to have only limited powers in respect of EGM venues.

Many of the welfare agencies in the Municipality have reported that they have experienced or are experiencing the impact of increased gambling expenditures in the form of :

- Problem gambling behaviour,
- Increased levels of poverty and bankruptcy,
- Family break ups,
- Domestic violence,
- Stress and anxiety

Local traders have also raised concerns about the impact that gambling has had or is having on their businesses.

4. THE LEGISLATIVE CONTEXT OF CONVENIENCE GAMBLING IN VICTORIA

Council’s scope for influencing the number of gambling machines, their location, and the conditions under which they operate is constrained by State Government legislation and policy, as follows:

- **Gambling Machines Control Act 1991.**

The Act provides a system for regulation, supervision and Control of gambling machines and defines the role of the Victorian Casino and Gambling Authority.

In addition, the Act required the establishment of the Community Support Fund which is managed within the Department of Premier and Cabinet.

- **State Planning Policy.**

Clause 3-9.1 indicates that it is State Government planning policy that:

- Planning controls for the installation and use of gambling machines be consistent across the state.
- Gambling machines be allowed without a permit in premises if it does not result in a change in the existing use of the land.
- If the installation of gambling machines results in a change of the use of land use then the effects on local amenity be considered.
- Gambling venues provide a full range of hotel facilities or services to club members.
- Gambling machines should not be permitted in shopping complexes. (This policy was introduced after a major venue at the Highpoint West shopping centre had been established.)

- **Planning Scheme Control**

State policy is implemented through provisions set out in the Maribyrnong Planning Scheme. The planning scheme provisions in relation to gambling and the installation and use of gambling machines are found in the state planning scheme (Clauses 3-9 and 8-4).

A planning permit is required if there is a change of use to a venue. A change of use is deemed to have occurred if the use of a venue for the purposes of gambling occupies more than 25% of the floor area.

The consideration of an application for a planning permit may take into account factors such as car parking, hours, noise, and impact on amenity. Moral concerns do not constitute allowable grounds for refusal or the imposition of particular conditions. It is however arguable that demonstrated social and/or economic impacts may provide such grounds.

Sec 60(b) of the Planning and Environment Act (social and economic effects) can be invoked in considering planning applications provided that such issues are directly relevant to the particular application. The development of a sound methodology to assist such deliberations is thus a high priority for Council.

Furthermore, there is to the best of Council's knowledge only limited precedent for use of Sec 60(b) to predict the response of the Victorian Civil and Administrative Tribunal. A recent decision of the Full Commission of the Liquor Licensing Commission Victoria (Decision number 617A of the Liquor Licensing Commission, application for review by City of Greater Geelong re: Golf View Hotel) indicates that there is some scope for opposition to extended hours on the basis of adverse economic and social impacts, but this issue remains comparatively complex and unclear.

Amendment S69 to all planning schemes in Victoria prohibited new gaming venues in strip shopping centres. However, a further amendment (S70) was recently promulgated. S70 provides that new gaming venues in strip shopping centres are prohibited, save that existing licensed hotels or clubs located in strip shopping centres may use not more than 25% of licensed floor area for EGM activity. New venues, which had obtained both planning approval and liquor licence approval prior to 16 June 1998, are regarded as existing venues under this amendment. An 'existing venue' in a strip shopping centre does

not require planning approval for the installation of EGMs up to 25% of its licensed floor area.

- **The industry**

There are three key interest groups that constitute the convenience gambling industry:

Venue Operators:	Hotels and Clubs
Gambling Machine Operators:	Tabcorp and Tattersalls
The state gambling regulatory body: Authority.	The Victorian Casino and Gaming

- **The process of EGM approval**

The process by which an EGM arrives in the municipality is that:

- A Hotel or Club applies to the Victorian Casino and Gambling Authority to become a licensed venue operator. They must demonstrate that they have:
 - a liquor licence, and
 - a Town Planning Permit or a letter from the Council that a permit is not required.
- A Club or Hotel only requires planning permission when the proposed restricted gambling area is more than 25% of the total floor area where liquor may be consumed. Local Government's only control over the amount of gambling venues in a municipality arises at this point.
- The venue operator then applies to one of the Gambling Machine Operators requesting a specified number of gambling machines. Venue operators are permitted a maximum of 105 machines. Gambling Machine Operators decide on the allocation of EGMs based on 'market forces' and within the following limitations:
 - 50% of machines statewide must be allocated to Licensed Clubs and 50% to Hotels,
 - 20% of machines must be allocated to rural Victoria.

5. CONVENIENCE GAMBLING IN MARIBYRNONG

Maribyrnong has a population of some 59,000. 40% of this population were born in countries where English was not the first language, and about 48% of the population speak a language other than English in their homes (ABS, 1996 Census data *in* Maribyrnong City Council, 1998).

Data for the March quarter in 1998 demonstrates that the unemployment rate in the Municipality, at 18.4%, was more than twice the Victorian average of 9.1% (DEETYA, 1998). June quarter data demonstrated a decline in this rate to 15.9%, but this was still the highest rate for the Melbourne metropolitan area (DEETYA, 1998a). Although official data are not readily available, unemployment amongst young people aged 15 to 19 is estimated to be in the range of 35% (estimated by Policy & Strategy Branch MCC). The structure of economic activity in the Municipality and region has undergone significant change in recent years. Older established industry has closed, relocated, or invested in job diminishing

technology. Consequently, job opportunities in manufacturing have diminished. This is particularly the case with low skilled or unskilled jobs (Maribyrnong City Council, 1998a).

According to 1996 Census data, the proportion of individuals earning incomes of less than \$300 per week ("low income earners") in the Municipality was 55.7%. This is the highest proportion in the Melbourne Metropolitan area, which averages 45.7%. It is also higher than the average for Regional Victoria, which is 53.2% (Moreland City Council, 1998: 21.1).

VCGA data as at 29 September 1998 indicates that there are 804 EGMs operating at 15 licensed venues within the Municipality. This represents 13.7 EGMs per 1,000 people within the Municipality, or 17.3 per 1,000 people aged 18 or more (see table 1). In addition, three further venues propose to operate EGMs once new facilities have been built/redeveloped. Each has already been granted a planning permit by Council. Only one of these proposals has indicated the number of EGMs (36) it proposes to operate, so that no estimate is available as to the impact of these developments on total EGM numbers within the Municipality. There have also been enquires about utilising another Hotel for use as a gambling venue which would also involve the movement of EGMs into Maribyrnong.

The VCGA inner city study estimates that EGM venues provide a total of 1330 jobs in the four inner city municipalities studied (Darebin, Maribyrnong, Moreland and Moonee Valley) of which 910 are part time. Of total employment estimated at 'gaming' venues, 220 full time and 420 part time jobs are estimated to be directly associated with 'gaming' strictly defined. No estimate of the number of jobs associated with EGMs is available for the municipality, although the VCGA study estimates that 'gaming' venues provide 0.8% of employment in the study area (VCGA, 1997: 40). Employment directly associated with gambling therefore provides approximately 0.4% of employment within the four LGAs the subject of the VCGA study. If this is true for the Municipality, the total number of jobs directly associated with EGMs would be about 81, of which about 28 would be full time (calculation based on ABS Census data, 1996). If employment were distributed in proportion to the distribution of EGMs within the inner municipalities study area, the number of jobs directly associated with gambling would have been 140, of which 48 would have been full-time.

Gambling researcher Rob Wootton has estimated the total take (ie. money lost by people playing EGMs) from the Municipality to be approximately \$43.8 million pa (in 1996-97). Wootton's total estimate for the cities of Maribyrnong, Moreland, Moonee Valley and Darebin is about \$191.8 million pa. This compares with VCGA estimates of total EGM losses within those cities at \$222.6 million pa. Tabcorp has recently reported that average revenue per EGM in 1997 was \$160 per day, and this figure applied to Maribyrnong's 804 EGMs would imply annual losses of approximately \$47 million from Maribyrnong gamblers (reported in *The Age*, 28 Oct 1998, p. B1). Estimates of per capita losses drawn from Wootton's data are likely therefore to be conservative.

Using Wootton's data, it appears that the per capita loss on EGMs in the Municipality is about \$14.30 per week for all people or \$18.05 per week for all people aged 18 or more (see table 2). If, as estimated by another study (reported in VCGA, 1997: 12), the proportion of people regularly using machines is 40% of the eligible population then the average loss per regular player is more than \$45 per week. Wootton estimates that of the

\$43.8 million lost from the Municipality each year through EGMs, revenue to Government is \$14.6 million (33.3%), revenue to EGM operators Tattersalls and Tabcorp is another \$14.6 million (33.3%), revenue to hotels is \$6.5 million (14.8%), and clubs take some \$5.4 million (12.3%). The Community Support Fund collects some \$2.7 million (6.2%) (Wootton, in City of Moreland, 1998: 22.2-3).

It is arguable that an area with a high proportion of low income earners is also likely to have a low average level of household savings. If, as VCGA argues, gambling is funded by a rundown in household savings, it is likely that at the point that savings are exhausted that gambling will be funded by a reduction in other consumption expenditure. This would also be more likely to be the case for low income earners because of their low propensity to save. It is therefore not surprising that the VCGA inner city study noted that “[t]he business people we have talked to have strongly indicated that (EGM spending) was ... at the expense of purchases in their shops” (VCGA, 1997: 165). Given current economic conditions, it is also important to note that work undertaken for VCGA by the National Institute for Economic and Industry Research argued that the

‘long run effects of increased gambling activity on retail spending may be more severe’ and allude to lower current savings translated into lower future consumption during any future recession when there would be renewed pressure on savings (in VCGA, 1997: 15).

- **Comparisons between Maribyrnong and other municipalities**

The number of EGMs per 1,000 population aged 18 or more (“adult EGM density”) located in the Municipality is, according to VCGA data collated at 29 September 1998, 17.3, the most dense concentration of these machines in suburban Melbourne. The City of Melbourne has an adult EGM density of 27.8, but is arguably an exceptional case because of its centrality, the large number of non-residents who regularly travel into and out of the CBD, its status as a destination for tourists and other visitors, and the consequent concentration of venues for gambling. After Maribyrnong, the next highest adult EGM density is the City of Greater Dandenong, with 12.3. The average adult EGM density in metropolitan Melbourne is 8.4, or 8.0 if the City of Melbourne is excluded (see table 1).

There appears to be a relationship between the proportion of low income earners and the EGM density (whether calculated for either total or adult population) in local government areas (“LGAs”) in metropolitan Melbourne, particularly if the City of Melbourne is excluded (see graphs). It appears that LGAs with a high proportion of low income earners tend to have the highest EGM density, and those with low proportions of low income earners also tend to have low densities of EGMs. The Municipality presents a clear example of this, and data for other LGAs in metropolitan Melbourne demonstrate this relationship. The Pearson correlation of the data sets for low income earners and adult EGM density is 0.679. This correlation is significant at the 0.01 level (2-tailed) (also excluding the City of Melbourne - see table 1 and graph 1).

There appears also to be an even stronger relationship between the unemployment rate of a particular LGA and the density of EGMs in that LGA. A comparison of the data sets for local area labour markets at June 1998 (DEETYA, 1998b) and VCGA EGM data for June

1998 demonstrate this relationship (see table 2 and graph 2). The Pearson correlation of these data sets, excluding the City of Melbourne, is 0.723. This correlation is significant at the 0.01 level (2-tailed).

There is thus a likelihood of high EGM density in areas where there are also comparatively large numbers of low income earners and unemployed people. As noted above, the non-Casino EGM operators (Tattersalls and Tabcorp) operate equal numbers of machines, which are allocated 80% to metropolitan areas and 20% to rural areas. Operators must also comply with the statewide cap of 27,500 and the venue cap of 105 machines, both set by direction of the responsible Minister (VCGA, 1997: 7; City of Moreland, 1998: 25.3). However, as noted above, the positioning of machines is determined by commercial viability; "in practice, the return from the gaming machines which the operators are seeking to maximise" (Moreland City Council, 1998: 15.3). The consequence of this appears to be that areas where there are large numbers of low income earners or unemployed people are targeted by EGM operators because the return from those areas is higher than from other areas. Average losses per active player in suburban Melbourne in 1996-97 are illustrated at graph 3. These figures are calculated by estimating the active player population at 40% of the adult population, which is broadly consistent with estimates by the Tasmanian Gaming Commission and VCGA survey data (VCGA, 1997: 12, 48).

An important area for future research is opened up by the apparent skewing of EGM placement into areas of socio-economic disadvantage. Of particular interest to LGAs is the relationship between EGM density and other local area economic activity, particularly retail activity. Council is currently exploring the possibility of research in this area. However, given the apparent relationship between unemployment and EGM density it would be valuable to undertake further research into the relationship between the incidence of social security and other transfer payments and the density of EGMs within particular areas. Also of interest would be research into the patterns of expenditure on EGMs of people in receipt of transfer payments.

- **Convenience gambling and the impact of problem gamblers**

The regressive nature of EGM expenditure is, at least in suburban Melbourne, clearly combined with or related to an increased exposure of low income earners to gambling opportunities using EGMs. This reflects the 'convenience' nature of EGMs, which are overwhelmingly located in local areas where local people can gain ready access - a point strongly noted by respondents to the VCGA telephone survey of inner city municipalities. Hotel proprietors interviewed for that study also noted this. "It's convenient, it's in the middle of their neighbourhood, it's got great bar prices and good promotions" (VCGA, 1997: 110, 79). The US researcher Robert Goodman refers to this phenomenon as 'convenience gambling' and notes that "[r]ather than adding new revenues, new development, and new jobs, it simply reshuffles what already exists in those communities" (Goodman, 1996: 26).

It is difficult to estimate the proportion of EGM gamblers who experience 'problem gambling', and even achieving a uniform definition of 'problem gambling' is difficult, although 40% of the respondents to the VCGA telephone survey of inner city municipalities reported that they knew someone who was a 'problem gambler' (VCGA, 1997: 63). A study

conducted for the VCGA in 1997 defined problem gambling as “the situation when a person’s gambling activity gives rise to harm to the individual ... to his or her family, and may extend into the community.” This study concluded that existing tools to determine the proportion of ‘at risk’ problem gamblers in the community were flawed, but despite this proposed that a particular test about which it expressed some concerns (the ‘South Oaks Gambling Screen’) be included in the VCGA’s gambling patterns survey (VCGA, 1997b). This test was included in the fifth such survey and indicated the at risk group was in the order of 1% (VCGA, 1998: 10). Goodman estimates that the rate of problem gambling in the United States varies between 1.5% and 6% of the adult population, and that the average cost to the community of each problem gambler was \$US13,200, in 1993 dollars. This was at the low end of a range of estimates which went as high as \$US52,000 pa per problem gambler. These estimates include costs associated with crime, health problems, family break-down, employment and other social and economic consequences of problem gambling (Goodman, 1996:49-51).

If Goodman’s estimates are utilised in a similar manner to that adopted by the Premier’s Drug Advisory Council in adapting US estimates of the financial impact of drug use on the community (see PDAC, 1996: v), we might estimate that the cost per year to Maribyrnong of problem gambling could be conservatively estimated at between \$9 million, involving about 700 individuals and their families, etc, (if about 1.5% of the adult population are ‘problem gamblers’) and \$36 million, involving around 2,800 individuals and their families, etc, (if about 6% of the adult population are problem gamblers). Goodman argues that existing research demonstrates that “the rate of problem gambling in a community tends to go up the more gambling is available in that community and the longer it is available” (Goodman, 1996: 47).

- **Problem gambling support services in Maribyrnong**

The following specific services for problem gamblers and their families, etc, operate in or are accessible from Maribyrnong:

Gamblers Anonymous

24 hour telephone support service.

Break Even Western

Problem gambling service for the Western metropolitan region offering:

- Counselling for individuals and families,
- Self help options
- Support groups,
- Community education.

A part time Counsellor (1.5 days per week) is based at the Western Region Health Centre.

Australian Vietnamese Women’s Welfare Service

Vietnamese speaking problem gambling counsellor for problem gamblers and their families.

One full time position.

There are thus 1.3 EFT problem gambling counsellors available in the City of Maribyrnong to deal with the minimum of around 700 individuals and their families affected by problem gambling who live within the municipality.

6. THE COMMUNITY SUPPORT FUND

The Community Support Fund, established under the Gaming Machines Control Act (1991), receives 8.33% of the net cash from Hotel venues only. It does not receive income from the licensed Clubs, the Casino or Tattersalls/Tabcorp. By 1995/96, after four years of EGMs in Victoria, the CSF had a weekly revenue of \$1.2 million, equivalent to annual revenue of \$62 million.

It is estimated that about \$2.7 million of EGM losses in hotels within Maribyrnong was credited to the CSF in 1996/97 (Wootton, in City of Moreland, 1998: 22.2-3).

The CSF provides funds to three broad expenditure categories:

- Research into the social impact of gambling;
- Sport and recreation and community services programs and purposes, and government initiatives on youth homelessness; and
- The promotion of arts and tourism.

In the second two categories, the majority of allocations from the CSF have been made to funding programs that are then administered by a specific State Government Department, for example a statewide Early Intervention Support Program, Statewide Family Skills Program, and Turning the Tide anti-drug initiatives. Funds have also been allocated to large sporting and tourism venues or events, including the development of the Melbourne Sports & Aquatic centre (\$55 million) and the development of hockey and Netball facilities at Royal Park (\$24.5 million). It is therefore difficult to assess how much money from the CSF has been returned for the direct benefit of the people of the Municipality. One specific project, a redevelopment of the Footscray Community Arts Centre, has been funded in Maribyrnong. This project received \$700,000.

A recent review of the Community Support Fund by the Victorian Auditor General's Office identified the need for :

- A consistent approach to assessment and approval of distributions from the Fund,
- A representative community body to provide an advisory role on funding priorities,
- The inclusion of the Casino and licensed Clubs as contributors to the Fund,
- Improved research into the impacts of gambling,
- Annual reporting on the performance of the CSF.

7. MARIBYRNONG CITY COUNCIL'S RESPONSE TO CONVENIENCE GAMBLING

Council's overall goal is to minimise the perceived harm associated with, and to maximise any benefits deriving from, convenience gambling. Clearly, it is important to develop the most comprehensive understanding of the nature and extent of any such harm or benefits, and Council's consultation and research priorities are intended to do so. However there are *prima facie* grounds supporting the view that communities such as Maribyrnong are experiencing disproportionate harmful effects from convenience gambling. Council is concerned to ensure that the benefits and detriments of gambling are more evenly and

equitably distributed across the broader community - which appears not to be the case at present.

Council has adopted both a framework policy and an interim policy in connection with convenience gambling. The rationale for the adoption of a policy position by Council has been that although the social and economic impacts of convenience gambling are not fully understood, a preliminary analysis of available data and literature, and anecdotal reports (consistent with material set out in this submission) indicate that there is considerable potential for harm to the community and individuals as the result of the rapid development of convenience gambling in recent years. This potential is exacerbated by the degree of disadvantage experienced by many residents of Maribyrnong.

Council is particularly concerned at the impact that high levels of gambling expenditure may have on local economic activity and is seeking to develop an understanding of that impact. Preliminary work has highlighted the regressive nature of gambling expenditure.

For example, active EGM gamblers in Maribyrnong, where 55.7% of income earners have incomes of less than \$300 per week, and the unemployment rate is around 16% (DEETYA, 1998b) lose an average of \$45 per week on EGM gambling. In Boroondara, where 39.3% of income earners earn less than \$300 per week and the unemployment rate is 5.8%, active EGM gamblers lose about \$6.20 per week. In a municipality such as Maribyrnong, it is difficult to accept that annual EGM losses of around \$45 million do not have an adverse impact on local consumption expenditure, with corresponding impacts on local employment and social conditions.

However, Council acknowledges that the introduction and regulation of EGMs is the responsibility of State Government and that EGMs in Maribyrnong are lawfully operated and provide considerable revenue to the State.

Accordingly, Council has adopted a harm minimisation philosophy as the framework for its policy development in the convenience gambling area. Harm minimisation is of course associated with policies developed for dealing with issues associated with illicit drug use, etc. Council is currently developing a convenience gambling strategy in keeping with this philosophical position.

At present, Council has embarked on a two armed approach to the further development of this strategy.

The first arm of this approach consists of the continuing development of a policy to guide Council decision making with respect to planning applications associated with EGM venues, and decisions associated with EGM venues operated on Council controlled property by licensed clubs. Council has adopted an Interim Policy on EGM venues, a copy of which is attached to this submission at the Appendix. This policy will be developed through further research and consultation with the community. Further, Council has adapted a draft "Charter for Responsible Gambling" from a model proposed by Moreland City Council and is seeking to negotiate with venue operators for the implementation of this Charter. This draft is also attached at the Appendix. Community consultation on convenience gambling has occurred through two forums organised by Council, in 1997 and

1998. The second of these involved representatives of the EGM industry, the community, and LGAs from across the Western Region of Melbourne as well as Moreland and Greater Dandenong City Councils. Council has also prepared a public discussion paper on poker machine gambling and will use this as a focus for public discussion and consultation on relevant issues.

The second arm of the approach consists of co-operation with other LGAs (including the two Victorian peak bodies of Local Government, the Municipal Association of Victoria and the Victorian Local Governance Association) with an interest in these issues for purposes of discussion, information sharing and possible collaboration on research. Council has identified a number of research priorities which have been referred to in the body of this submission and will seek to pursue at least some of these collaboratively. This group may also develop recommendations for legislative or regulatory change arising from the research process if this appears warranted.

REFERENCES USED IN THIS SUBMISSION:

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APPENDIX A

EGM Venues in Maribyrnong at 30 June 1998

Venue	Type	Address	EGMs	Operator
Anglers Tavern	Hotel	2 Raleigh Rd, Maribyrnong	34	Tatts
Ashley Hotel	Hotel	226 Ballarat Rd, Braybrook	90	TAB
Australian Croatian Association	Club	72 Whitehall St Footscray	20	TAB
Braybrook Hotel	Hotel	353 Ballarat Rd Braybrook	80	Tatts
Court House Hotel	Hotel	166 Nicholson St Footscray	40	Tatts
Footscray Football Club	Club	417 Barkly St West Footscray	60	TAB
Footscray RSL Club	Club	48 Geelong Rd Footscray	35	Tatts
Highpoint Tavern	Hotel	Rosamond Rd Maribyrnong	105	TAB
Maribyrnong Maidstone RSL	Club	56 Raleigh Rd Maribyrnong	5	Tatts
Medway Golf Club	Club	Omar St Maidstone	5	Tatts
Powell Hotel	Hotel	202 Ballarat Rd Footscray	70	Tatts
Victoria Hotel	Hotel	188 Hyde St Yarraville	35	TAB
Yarraville & Seddon Bowling Club	Club	Francis & Hawkhurst Sts Spotswood	20	TAB
Yarraville Club	Club	135 Stephen St Yarraville	105	Tatts
Yarraville Club Cricket Club	Club	Ballarat & Rosamond Rds Maidstone	100	TAB
HOTEL TOTAL	7		454	
CLUB TOTAL	8		350	
TOTAL	15		804	

**8 venues are Tatts - 4 hotels (224 EGMs), 4 clubs (150 EGMs)
7 venues are TAB - 3 hotels (230 EGMs), 4 clubs (200 EGMs)**

APPENDIX B

DRAFT FOR DISCUSSION

Charter for Responsible Gambling

Purpose of this Charter

This Charter sets out a framework for responsible action by local gaming venues within the City of Maribyrnong, demonstrating that venues care about the community, provide a safe, healthy and pleasant environment, and support the local community.

This Charter will be implemented by Maribyrnong City Council in co-operation with gaming venues through the Maribyrnong Forum for Responsible Gaming (see attached appendix). The Forum will consist of Council, local venues that subscribe to the Charter, and relevant local community organisations.

This Charter sets out principles for responsible gaming which are agreed to by all members of the Forum. The Forum will take no moral position on gambling as a social activity. Its purpose is to ensure that the potential negative effects of gambling on the local community are minimised, and that benefits to the community are maximised.

This Charter and the Forum it establishes will help to establish good relationships between gaming venues within the City of Maribyrnong, and the local community, facilitated by Maribyrnong City Council.

Parties to the Charter

The parties to this Charter are:

- Maribyrnong City Council;
- Operators of Electronic Gambling Machine (EGM) venues operating within the City of Maribyrnong who join the Maribyrnong Forum for Responsible Gaming; and
- Community organisations with a demonstrated focus on gambling issues from within the City of Maribyrnong who join the Maribyrnong Forum for Responsible Gaming.

Principles of this Charter

Venues who sign this charter endorse the following principles:

- We care about the welfare of our customers
- We provide a pleasant, safe, and healthy environment
- We directly support our local community

The Obligations of Parties to this Charter

Venues who subscribe to this Charter agree to:

- Commit themselves to the Principles and obligations of the Charter, and sign a copy of the Charter to demonstrate this commitment;

- Provide a report annually, indicating the extent to which the Obligations of the Charter have been met, any areas where those Obligations have not yet been met, steps taken to meet Obligations, and targets or plans for the forthcoming year;
- Respond to issues raised by community members or organisations;
- Regularly attend meetings of the Forum, pay the annual fee for membership of the Forum, and participate in the activities of the Forum;
- Recommend improvements to this Charter and to the activities of the Forum as they see fit.

The Forum will:

- Permit and encourage members of the Forum to advertise their membership and their commitment to the Principles and Obligations of this Charter;
- Provide a vehicle for discussion of relevant issues and ideas about gambling in the local community;
- Review and update the provisions of the Charter and the operations of the Forum;
- Determine and present an annual award for best venue within the City of Maribyrnong;
- Prepare and submit an annual report to Maribyrnong City Council.

Maribyrnong City Council will:

- Provide necessary support and assistance to the Forum;
- Assist with the preparation of reports;
- Facilitate communication between the Forum and the community generally;
- Establish and maintain records of membership and a register of EGM venues and numbers within the city of Maribyrnong;
- Assist with projects, activities or research undertaken by the Forum.

Obligations of the Charter

Parties who sign this Charter commit themselves to the following requirements:

1. *Display of information*

Venues will display the following notices or provide information in a position within their venue which is visible or accessible to the majority of patrons:

- A copy of this Charter
- Responsible gambling advisory notices
- Notices advising of the availability of counselling services for problem gambling
- A notice detailing sensible gambling practices, including
 - * the dress code for the venue
 - * the behaviour code for the venue, i.e. intoxicated patrons will be refused service, no aggressive behaviour, etc.
 - * a process for dealing with complaints
 - * suggestions to assist patrons to take a break from gambling, such as 'have a coffee break,' 'take time out to chat,' 'count to ten every time you win.'
 - * Information about the odds or returns from EGMs operated at the venue.
- This information will be available in languages appropriate to the venue's patrons.

2. *Clocks and Daylight*

Venues will display accurate clocks which are visible to the majority of patrons within the venues gambling area. The gambling area will have direct access to daylight.

3. *Tea and coffee lounge*

Venues will provide free tea and coffee facilities in an informal lounge area for patrons taking a break from using EGMs.

4. *Fresh Air*

Venues will provide a smoke free area within the gambling area, or will air condition the premises to 'fresh air' standard.

5. *Reservation of EGMs*

Patrons are allowed to reserve EGMs for up to 5 minutes during peak periods. At other times, patrons may reserve EGMs for up to 30 minutes.

6. *Payment by Cheque*

Winnings of more than \$100 will be paid by cheque.

7. *Alternative activities*

The venue provides a range of leisure and entertainment activities other than EGM use.

8. *Complaints*

The venue has arrangements in place to responsibly and quickly deal with and resolve complaints from patrons, other businesses, and the community generally.

9. *Staff Skills*

Staff have been appropriately trained to identify and deal sensitively with patrons who are experiencing problems with their gambling, and to refer those patrons to appropriate support services. Staff are encouraged to get to know their patrons and interact with them positively.

Appendix

Maribyrnong Forum for Responsible Gaming

The Maribyrnong Forum for Responsible Gaming will be established in order to oversee the operation of this Charter, to provide a forum for discussion about the impact of gambling on the local community, and to formulate measures to ensure that the negative impact of gambling can be minimised and benefits maximised. The Forum will also provide a vehicle for the consideration of gambling related issues raised by the community generally.

Maribyrnong City Council will convene meetings of the Maribyrnong Forum for Responsible Gaming (the Forum) and will undertake to provide a venue for meetings, service those meetings, record the proceedings of meetings and communicate as necessary on behalf of the Forum.

Membership of the Forum will be free unless the Forum subsequently determines an annual fee. Maribyrnong City Council will support the Forum administratively and meet reasonable expenses associated with postage, support for meetings, etc.

Where necessary, the Forum will make decisions on the basis of one vote per member, but will seek wherever possible to operate on the basis of consensus.

The Chair of the Forum will be the Mayor of the City of Maribyrnong. The procedure to be adopted in meetings of the Forum will be in accordance with usual practice for meetings of organisations. Meetings of the Forum will be convened as required, but not less than four times per calendar year.

Interim Policy on Convenience Gambling Venues

The following policy guidelines are intended to deal with planning applications and other matters related to electronic gambling machine (EGM) venues which require action by Council. This is an interim policy which is likely to be further refined. It will also have implications for other policy areas which may also require amendment.

These guidelines have been developed as a result of Council's concern at the apparent saturation of the City of Maribyrnong with EGMs. The ratio of EGMs to population in Maribyrnong is by far the highest in suburban Melbourne. There appear to be disproportionate economic and social effects associated with this disproportionate development of EGMs. Council does not have a moral position on gambling. Council however wishes to take steps to ensure that the economic and social effects of developments associated with EGM gambling are more evenly distributed throughout the metropolitan area and the State.

Charter for Responsible Gambling

A draft Charter for Responsible Gambling has been prepared and, subject to consultation, comment and revision, Council will take all reasonable measures to ensure that the Charter is adopted by all EGM venues operating in Maribyrnong.

Organisations seeking a new site for facilities on Council property.

If organisations occupy premises on a seasonal basis, they will be required to adhere to a deed of agreement which refers to the Sporting Resources Allocation Policy, which requires amendment to specifically exclude the operation of EGMs on relevant premises.

If a lease arrangement is the most appropriate form of relationship between the organisation and Council, the terms of any such lease shall specifically prevent the operation of EGMs. An organisation party to such a lease which subsequently wishes to operate EGMs will be required to obtain Council's agreement to revoke the existing lease and negotiate a new lease. Organisations should be aware that Council will be under no obligation to agree to such a revocation and is likely to insist on full adherence to all terms of any lease. A decision to revoke and renegotiate a lease in these circumstances must be taken by a meeting of Council.

Organisations with an existing site on Council property, which do not operate EGMs, and which are seeking to renew their lease

Any new leases for premises which do not operate EGMs should specifically exclude the operation of EGMs, in line with the arrangements for new leases with new organisations.

Organisations with existing sites on Council property seeking to introduce EGM operations

Pre-existing leases are silent on gambling or the operation of EGMs, and provided the proposed area for operating EGMs is less than 25% of the licensed area, Council is unlikely to have any capacity to veto or restrict EGM operations.

If new works are required to accommodate EGM operations, or the lease is due to expire in the near future, Council may have a capacity to negotiate with the organisation. In such circumstances a new lease will be negotiated which excludes EGM operation, in line with new leases as referred to above. However, Council may consider entering into a lease which allows for the operation of EGMs in these circumstances if:

- Council is of the view that there are exceptional circumstances (such as a demonstrated need to fund improvements where organisations have amalgamated, etc);
- the organisation agrees to a reasonable upper limit on EGM numbers to be inserted into a new lease in terms which do not provide for further expansion; and
- the organisation agrees to adhere to the Charter for Responsible Gambling.

A decision to enter into a lease allowing for EGM operations must be taken by a meeting of Council.

Organisations with existing sites on Council property seeking to expand an existing EGM operation

Organisations in this category operate under leases which are silent on the subject of EGM operations, although Council may have some powers in relation to liquor licences. Provided such an organisation has obtained an appropriate liquor licence and the floor area proposed for EGM operation is less than 25% of the licensed area, Council is unlikely to have any capacity to veto or restrict EGM operations.

If the expansion takes the area proposed beyond 25% of the licensed floor space, planning approval is required. Alternatively, the organisation may require planning approval and Council's agreement to a new lease if it is redeveloping the site to accommodate EGM expansion. In such circumstances a new lease will be negotiated which limits EGM operations to those previously existing. However, Council may consider entering into a lease which allows for the operation of EGMs in these circumstances if:

- Council is of the view that there are exceptional circumstances (such as a demonstrated need to fund improvements where organisations have amalgamated, etc);
- the Organisation agrees to a reasonable upper limit on EGM numbers to be inserted into a new lease in terms which do not provide for further expansion; and
- the Organisation agrees to adhere to the Charter for Responsible Gambling.

At the expiry of an existing lease with an organisation which operate EGMs, Council will negotiate a new lease which includes a provision limiting EGM numbers to those currently operating and requiring that the Organisation agree to adhere to the Charter for Responsible Gambling.

In any renegotiated lease, Council will also negotiate to charge a rate or a rent or both having regard to the inequity between organisations with substantial income derived from EGMs and those with more limited income from members' subscriptions and bar trading only.

The factors to be taken into account in determining a fair rate or rent will include the extent of any demonstrated community benefit provided by the organisation as a result of its EGM income, the amount of EGM income, and the market rate or rent of the property.

Existing EGM venues (clubs or hotels), on Council or private property, seeking an extension of hours

It is likely that some existing EGM venues will seek an extension of hours, for which planning approval is required. No approval will be granted for extensions of hours.

Hotels venues

If established licensed premises are within strip shopping centres the floor space devoted to EGMs must be not more than 25% of the licensed area. Planning approval is not required for such venues.

Other venues outside strip shop centres may also operate EGMs in floor space up to 25% of their floor area without seeking planning approval, but are required to seek such approval if the floor space devoted to EGMs is greater than 25%. Council will refuse planning approval for EGM operations beyond 25% of licensed floor area.

In some circumstances, redevelopment of venues may be required to accommodate EGMs and planning approval may be required for such redevelopment. Planning approval for such redevelopments will not be granted.

Table 1 - EGM Numbers and EGM density - metropolitan Melbourne Dec 1997 to Sep 1998

City	EGMs			Adult Populat'n	% low inc	EGMs per k. adults		
	31-Dec-97	30-Jun-98	29-Sep-98			31-Dec-97	30-Jun-98	29-Sep-98
Melbourne	1161	1129	1111	39896	40.2	29.1	28.3	
Maribyrnong	807	804	804	46540	55.7	17.3	17.3	
Grt Danden'g	1170	1156	1154	94112	52.1	12.4	12.3	
Darebin	1044	1054	1047	97482	53.0	10.7	10.8	
Hobsons Bay	514	529	599	55934	48.1	9.2	9.5	
Morn Penin	803	838	831	80803	50.7	9.9	10.4	
Moonee V	851	848	840	82475	46.9	10.3	10.3	
Wyndham	505	511	511	50203	42.2	10.1	10.2	
Kingston	938	938	938	94276	46.7	9.9	9.9	
Knox	844	911	911	92011	42.9	9.2	9.9	
Melton	195	197	242	25929	45.4	7.5	7.6	
Monash	964	1027	1097	120597	46.4	8.0	8.5	
Hume	679	699	699	79051	47.1	8.6	8.8	
Yarra	454	442	442	54912	43.8	8.3	8.0	
Whittlesea	575	580	580	72285	47.6	8.0	8.0	
Moreland*	796	800	800	103588	52.8	7.7	7.7	
Glen Eira	644	681	691	90036	43.4	7.2	7.6	
Port Phillip	427	482	482	63176	38.3	6.8	7.6	
Casey	717	726	726	97186	42.0	7.4	7.5	
Brimbank	740	787	787	106738	51.6	6.9	7.4	
Banyule	620	628	628	85356	44.5	7.3	7.4	
Frankston	544	545	545	75285	47.0	7.2	7.2	
Maroondah	477	477	477	66909	43.6	7.1	7.1	
Manningham	538	511	511	79403	43.7	6.8	6.4	
Cardinia	172	172	172	27808	45.4	6.2	6.2	
Whitehorse	611	624	624	106224	45.4	5.8	5.9	
Stonnington	391	391	397	70149	36.2	5.6	5.6	
Bayside	318	294	294	62238	40.7	5.1	4.7	
Yarra Ranges	313	388	388	90923	45.1	3.4	4.3	
Nilumbik	167	147	147	36843	38.7	4.5	4.0	
Boroondara	266	261	256	112575	39.3	2.4	2.3	
TOTAL exc Mlb	18084	18448	18620	2321047		7.8	7.9	
TOTAL inc Mlb	19245	19577	19731	2360943		8.2	8.3	

*does not include Carlton Social Club, Glenroy

Sources: VCGA, City of Moreland, 1998, ABS
Data: Moreland CC RESP GAMB STRAT 1998; WR Social Profile 1998, ABS
Statsite- 1996
Census data age by LGA

Table 2: Take from EGMs by LGA

City	Populat'n	Populat'n 18+	% low inc	Take \$ pa	Take pc \$ pa	Take pc \$ pw	Take 18+ \$ pa	Take \$ p
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Melbourne	45248	39896	40.2	62356000	1378	26.43	1562.96
Maribyrnong	58774	46540	55.7	43814000	745	14.30	941.43
Grt Danden'g	125722	94112	52.1	60274000	479	9.19	640.45
Darebin	121265	97482	53.0	58120000	479	9.19	596.21
Wyndham	73691	50203	42.2	28570000	388	7.44	569.09
Moonee V	104576	82475	46.9	46932000	449	8.61	569.05
Morn Penin	110120	80803	50.7	43857000	398	7.64	542.76
Kingston	122042	94276	46.7	50110000	411	7.87	531.52
Knox	130398	92011	42.9	47779000	366	7.03	519.27
Hume	115733	79051	47.1	37485000	324	6.21	474.19
Hobsons Bay	73951	55934	48.1	26046000	352	6.75	465.66
Whittlesea	101691	72285	47.6	32565000	320	6.14	450.51
Yarra	64643	54912	43.8	24647000	381	7.31	448.85
Monash	151673	120597	46.4	52468000	346	6.63	435.07
Casey	143210	97186	42.0	41864000	292	5.61	430.76
Melton	39106	25929	45.4	10824000	277	5.31	417.45
Moreland*	129676	103588	52.8	42963000	331	6.35	414.75
Frankston	103686	75285	47.0	30548000	295	5.65	405.76
Banyule	112112	85356	44.5	34288000	306	5.87	401.71
Brimbank	148795	106738	51.6	42588000	286	5.49	399.00
Port Phillip	72153	63176	38.3	24823000	344	6.60	392.92
Maroondah	91111	66909	43.6	25839000	284	5.44	386.18
Glen Eira	112738	90036	43.4	33398000	296	5.68	370.94
Manningham	103242	79403	43.7	28400000	275	5.28	357.67
Whitehorse	134829	106224	45.4	34743000	258	4.94	327.07
Stonnington	83414	70149	36.2	21351000	256	4.91	304.37
Cardinia	40530	27808	45.4	8433000	208	3.99	303.26
Bayside	80480	62238	40.7	17321000	215	4.13	278.30
Nilumbik	54275	36843	38.7	8177000	151	2.89	221.94
Yarra Ranges	130454	90923	45.1	16176000	124	2.38	177.91
Boroondara	143633	112575	39.3	14547000	101	1.94	129.22
TOTAL inc Mlb	3122971	2360943		1051306000			445.29
TOTAL exc Mlb	3077723	2321047		988950000			426.08

**Table 3:
Unemployment Rate vs EGM density - metropolitan Melbourne by LGA - Jun 1998**

Source: Small area labour markets - DEETYA report for June quarter 1998, VCGA data

LGA	Labour	Unemployed		EGMs per
	Force	N	%	k. adults
Melbourne	26300	1728	6.6%	28.3
Maribyrnong	28146	4462	15.9%	17.3
Gr Dandenong	64710	8215	12.7%	12.3

Darebin	61475	7477	12.2%	10.8
Morn Penin	53706	4663	8.7%	10.4
Moonee Valley	58547	4283	7.3%	10.3
Wyndham	40477	2651	6.5%	10.2
Kingston	67652	4674	6.9%	9.9
Knox	75318	4870	6.5%	9.9
Yarra	40927	3548	8.7%	9.9
Hobsons Bay	39232	3258	8.3%	9.5
Hume	60531	4978	8.2%	8.8
Monash	87213	6461	7.4%	8.5
Whittlesea	55006	4689	8.5%	8.0
Moreland	65565	6806	10.4%	7.7
Melton	21119	2257	10.7%	7.6
Port Phillip	47444	3279	6.9%	7.6
Glen Eira	63182	4022	6.4%	7.6
Casey	79533	5637	7.1%	7.5
Brimbank	75853	8349	11.0%	7.4
Banyule	63124	3372	5.3%	7.4
Frankston	56028	4952	8.8%	7.2
Maroondah	52366	3765	7.2%	7.1
Manningham	61612	3431	5.6%	6.4
Cardinia	22128	1454	6.6%	6.2
Whitehorse	76043	5603	7.4%	5.9
Stonnington	52510	2372	4.5%	5.6
Bayside	44248	1955	4.4%	4.7
Yarra Ranges	72083	5640	7.8%	4.3
Nilumbik	32552	1070	3.3%	4.0
Boroondara	81903	4771	5.8%	2.3

City	EGMs 29-Sep-98	Adult Populat'n	% low inc	EGMs per k. adults
Melbourne	1111	39896	40.2	27.8
Maribyrnong	804	46540	55.7	17.3
Grt Danden'g	1154	94112	52.1	12.3
Darebin	1047	97482	53.0	10.7
Hobsons Bay	599	55934	48.1	10.7
Morn Penin	831	80803	50.7	10.3
Moonee V	840	82475	46.9	10.2
Wyndham	511	50203	42.2	10.2
Kingston	938	94276	46.7	9.9
Knox	911	92011	42.9	9.9
Melton	242	25929	45.4	9.3
Monash	1097	120597	46.4	9.1
Hume	699	79051	47.1	8.8
Yarra	442	54912	43.8	8.0
Whittlesea	580	72285	47.6	8.0
Moreland	800	103588	52.8	7.7
Glen Eira	691	90036	43.4	7.7
Port Phillip	482	63176	38.3	7.6
Casey	726	97186	42.0	7.5
Brimbank	787	106738	51.6	7.4
Banyule	628	85356	44.5	7.4
Frankston	545	75285	47.0	7.2
Maroondah	477	66909	43.6	7.1
Manningham	511	79403	43.7	6.4
Cardinia	172	27808	45.4	6.2

Whitehorse	624	106224	45.4	5.9
Stonnington	397	70149	36.2	5.7
Bayside	294	62238	40.7	4.7
Yarra Ranges	388	90923	45.1	4.3
Nilumbik	147	36843	38.7	4.0
Boroondara	256	112575	39.3	2.3

City	Active take \$ pw
Maribyrnong	45.14
Grt Danden'g	30.71
Darebin	28.59
Wyndham	27.29
Moonee V	27.28
Morn Penin	26.02
Kingston	25.48
Knox	24.90
Hume	22.74
Hobsons Bay	22.33
Whittlesea	21.60
Yarra	21.52
Monash	20.86
Casey	20.65
Melton	20.01
Moreland*	19.89
Frankston	19.45
Banyule	19.26
Brimbank	19.13
Port Phillip	18.84
Maroondah	18.52
Glen Eira	17.78
Manningham	17.15
Whitehorse	15.68
Stonnington	14.59
Cardinia	14.54
Bayside	13.34
Nilumbik	10.64
Yarra Ranges	8.53
Boroondara	6.20