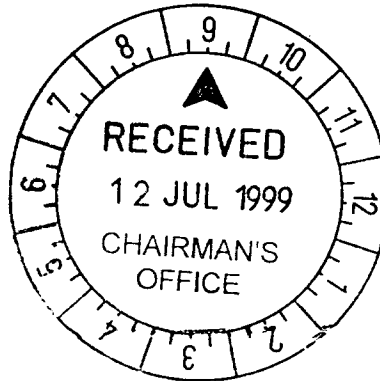




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The Commissioners  
 Productivity Commission  
 PO Box 80  
 Belconnen ACT 2616

Dear Commissioners

The purpose of this letter is to convey the concerns of the Queensland Responsible Gambling Advisory Committee at the perspectives underpinning the submission made by *Australia's Gambling Industries* to the Productivity Commission's Inquiry into Gambling. This submission was prepared by ACIL Consulting. It is the Responsible Gambling Advisory Committee's contention that the economic focus of this submission presents only a partial view of the impacts of gambling on Australians.

It is the view of the Responsible Gambling Advisory Committee that appropriate public policy relating to gambling is built upon a recognition of the economic *and* social benefits and costs. Whilst the Advisory Committee recognises the importance of the economic context in which gambling activity occurs, it is committed to approaches that maximise social benefits and minimise harmful impacts.

Attention to the economic and social impacts of gambling is a focus for the Responsible Gambling Advisory Committee which brings together a diverse range of stakeholders from peak bodies in community, industry and Government in Queensland. The Advisory Committee recognises the positive impacts of gambling on industry and the Australian economy as explored in the submission. However, the claim that the adverse impacts of gambling are not as 'grave' as are commonly portrayed must be challenged.

The Queensland context is one in which there is recognition among community, industry and Government groups that a portion of the community experiences significant social and psychological problems as a consequence of excessive gambling. Whilst there is no attempt to apportion blame, the Responsible Gambling Advisory Committee is committed to shared responsibility by all stakeholders to investigate possible solutions and implement appropriate actions with regard to the adverse impacts of gambling. Importantly, the Responsible Gambling Advisory Committee also recognises the lack of empirical data available to measure and consider the social impacts of the expanding gambling market.

The commitment of the Responsible Gambling Advisory Committee to the pursuit of a broad range of strategies to promote responsible approaches to gambling is evidenced by its recommendations to the Queensland Review of Gaming submitted in early June 1999. The approaches suggested by these recommendations indicate the Responsible Gambling Advisory Committee's acknowledgement of the adverse impacts of gambling on a portion of the community. Recommendations to address this situation include the development, funding and implementation of a statewide responsible gambling service delivery system, the

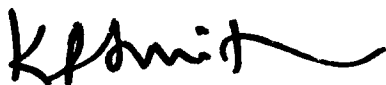
commissioning of rigorous research which involves quantitative and qualitative approaches, as well as early intervention strategies. The development of school curriculum modules that explore issues related to excessive gambling is one example of such early intervention strategies.

These approaches are advocated within a context of the continued alliance of community, industry and Government groups in promoting responsible gambling approaches in which there is an appropriate allocation of gambling revenue to support harm minimisation strategies.

The Responsible Gambling Advisory Committee recognises the difficulty of measuring the effect of problem gambling and looks forward to the Commission's investigation to further develop our understandings of the complex issues involved.

It is hoped that the Productivity Commission's Gambling Inquiry will consider the breadth of issues relating to the impacts of gambling on Australians and critically challenge any submissions underpinned by a narrow economic focus.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ken Smith', with a long horizontal flourish extending to the right.

Ken Smith

**Director-General**

**Department of Families, Youth and Community Care**  
**Chair, Responsible Gambling Advisory Committee**