

Social Impact Report

2024 Gambling Venues Policy Review

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I. Executive Summary

Under both the Gambling Act 2003 and the Racing Industry Act 2020, Waikato District Council is required to implement a Class 4 Venues Policy and a TAB Venues Policy, currently jointly covered as the Gambling Venues Policy 2021. These policies are legislatively required to be reviewed every three years, with the last review having occurred in 2021.

For the purposes of meeting the legislative requirement to “have regard to the social impact of gambling within the territorial authority” and to inform the policy review, staff have compiled a Social Impact Report to discuss the social costs and benefits of Class 4 and stand-alone TAB venue gambling within the Waikato District. The research was primarily undertaken as a desktop investigation with key stakeholder engagement.

The report outlines demographic information for Waikato District, gambling statistics and trends for both the district and New Zealand, and the location of venues in the district. It also breaks down the elements of the policy, including the legislative scope allowed for in the two pieces of legislation.

There is a summary of the stakeholder responses, and information from the last two reviews of the Gambling Venues Policy (2021 and 2018).

2. Introduction

Purpose of the report

In adopting each of these policies, Council must have regard to the social costs and benefits of Class 4 and stand-alone TAB gambling within its district. This Social Impact Report seeks to discuss the social costs and benefits of Class 4 and TAB gambling in New Zealand and more specifically for the residents of the Waikato District. The report will provide preliminary research to inform the review of the Council's Gambling Venues Policy (the policy).

For the purposes of informing the Council's policy review, the report will provide an overview of:

- Gambling statistics at a national level
- Class 4 and stand-alone TAB gambling and venue statistics within the Waikato District
- The potential social benefits from Class 4 and stand-alone TAB gambling within Waikato District
- The potential social costs from Class 4 and stand-alone TAB gambling within Waikato District

Methodology

The assessment has been primarily undertaken as a desktop review, using statistics and information from online sources and stakeholder engagement.

Seven key stakeholder engagements were undertaken, and information gathered from these has also been used to identify and explain social costs and benefits that gambling has within the community. These key stakeholders have been identified from the previous reviews.

The targeted stakeholders that the project team reached out to as part of this research were:

- the Environmental Health Team Leader at Waikato District Council
- New Zealand TAB
- The Lions Foundation
- GMANZ
- Manatu Ora Ministry of Health
- Te Kohao Health
- Kainga Ora
- Raukura Hauora o Tainui
- K'aute Pasifika
- Problem Gambling Foundation, and
- Te Whatu Ora / Waikato District Health Board.

Staff received written responses from:

- the Environmental Health Team Leader at Waikato District Council
- The Lions Foundation (TLF)
- Gaming Machine Association of New Zealand (GMANZ)
- Manatu Ora Ministry of Health, and
- Te Whatu Ora / Waikato District Health Board.

Staff received a written response from Problem Gambling Foundation and had a Teams meeting with members of their staff.

A summary of the feedback is contained in Section 6.

Findings from research and stakeholder interviews have been split into the potential social benefits and costs within the Waikato District community level. This is intended to be an indication of potential costs and benefits of Class 4 and stand-alone TAB gambling and is a first step to inform the policy review.

Further stakeholder/community engagement and consultation is being planned.

Key Assumptions and Limitations

The following limitations and assumptions have been applied.

- This report has been primarily carried out as a desktop study, with feedback sought from key stakeholders through focused engagements.
- At this time, wider community engagement has been excluded from the scope of the report.
- There was no mana whenua engagement undertaken, and therefore no local cultural costs and benefits have been assessed. Impacts on Maaori have been addressed through early engagement.
- Note that data has been sourced from the 2018 census, which may limit the accuracy of some of the data used.
- In Figure 6, where a person reported more than one ethnic group in the 2018 census, they were counted in each applicable group, and therefore the categories will not add up to exactly 100%.

Community profile¹

The Waikato District is located in the upper north island of New Zealand and includes many small provincial towns such as Huntly, Raglan, Ngāruawāhia, Tuakau and Te Kauwhata. The district is shown in Figure 1 outlined in black below.

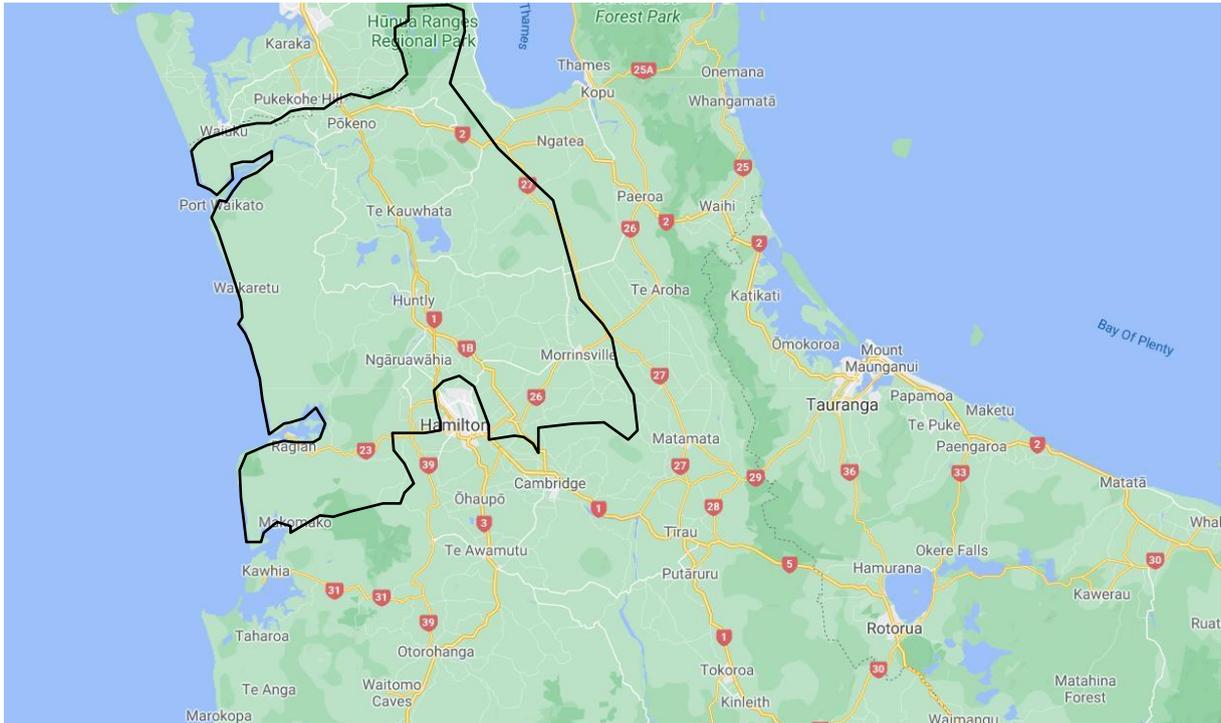


Figure 1 Waikato District boundary

The Waikato District has a population of 90,100 individuals with 71 per cent over the age of 19 years² and a median age of 37.6 years. The population of the district has grown steadily since 2006, as shown by Figure 2 below.

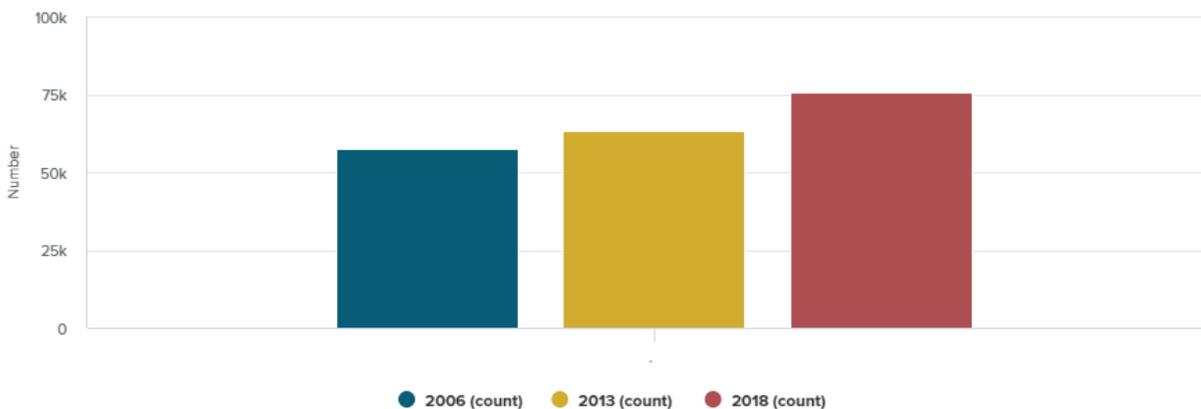


Figure 1: Population in the Waikato District 2006-2018

¹ Statistics New Zealand. Place summaries – Waikato District. <https://www.stats.govt.nz/tools/2018-census-place-summaries/waikato-district>

² data extracted on 27 Mar 2024 19:57 UTC (GMT) from NZ.Stat

The population of the district is predominantly of European descent (approximately 76%) Those who identified as Maaori were about 25% and those that identified as either of Asian or Pacific descent were at 6% and 5% respectively. The proportion of people who identified as European and Maaori are both higher than the National proportions, and all other ethnicities are lower than the national proportion. This is shown in Figure 3³ below.

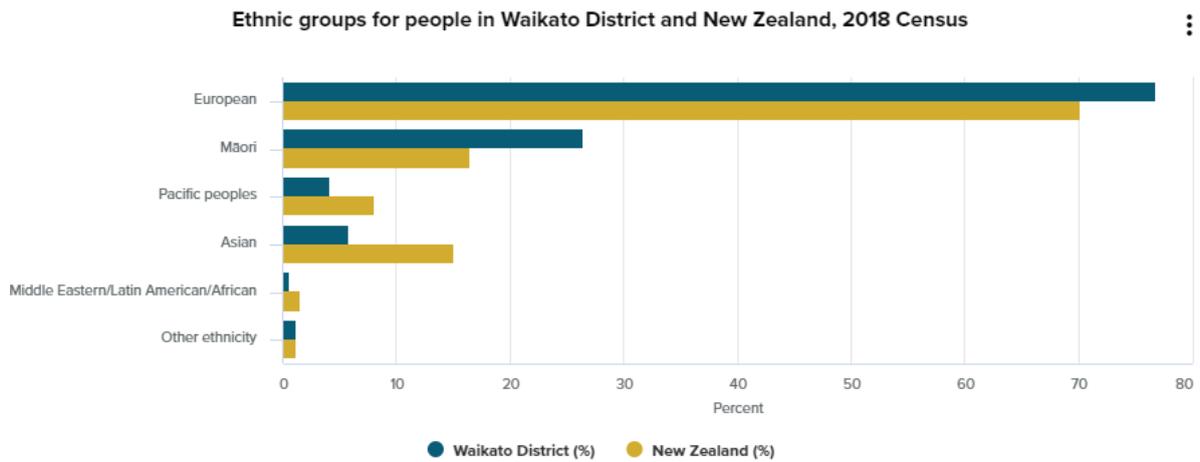


Figure 3 Ethnic groups for people in the Waikato District and New Zealand

The Waikato District had an unemployment rate of 4.1% in the latest census statistics in 2018, with 53.2% of the population is employed full-time. The proportion of people employed full time is slightly above the national proportion, with the proportion of unemployed matching the national average. This is shown below in Figure 4.

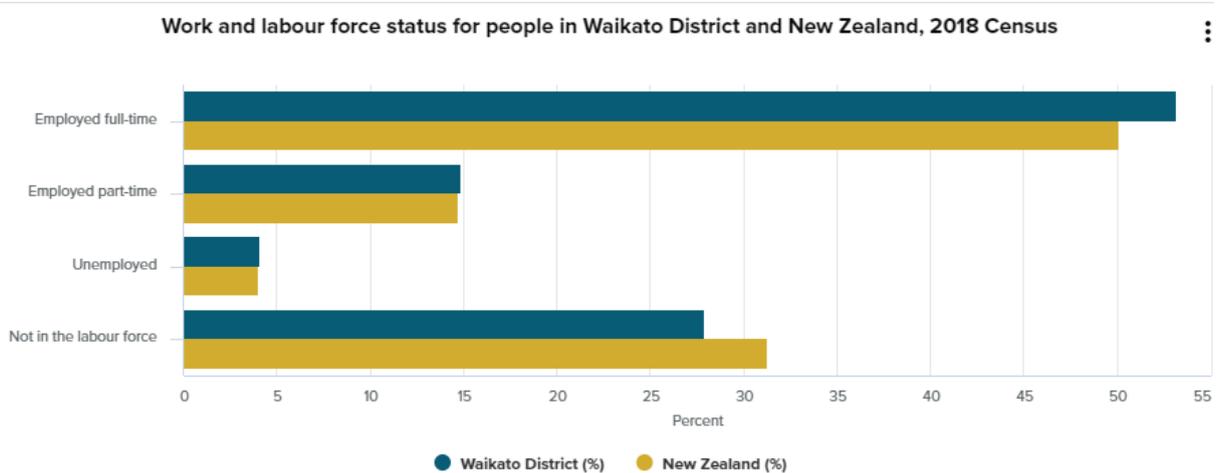


Figure 4 Work and labour force status for people within the Waikato District

³ It is noted that where a person reported more than one ethnic group, they were counted in each applicable group, therefore the proportions will not add to 100%.

The New Zealand Deprivation Index⁴ is an area-based measure of socio-economic deprivation in New Zealand and measures the level of deprivation for people in a small area. The deprivation level is based on number of factors such as people with no access to internet, those receiving benefits, unemployment rates and level of qualification.

The Waikato District contains places that have a range of deprivation scores, with the majority being medium risk (scores of 5-6 for statistical areas). There are 3 statistical areas identified as having a very high deprivation score (9-10 for statistical area) and these places are Maramarua/ Te Kauwhata, the east coast of the district between Port Waikato and Waikaretu and directly to the north of Hamilton around Huntly and Ngaaruawaahia. These are shown on Figure 5 below.

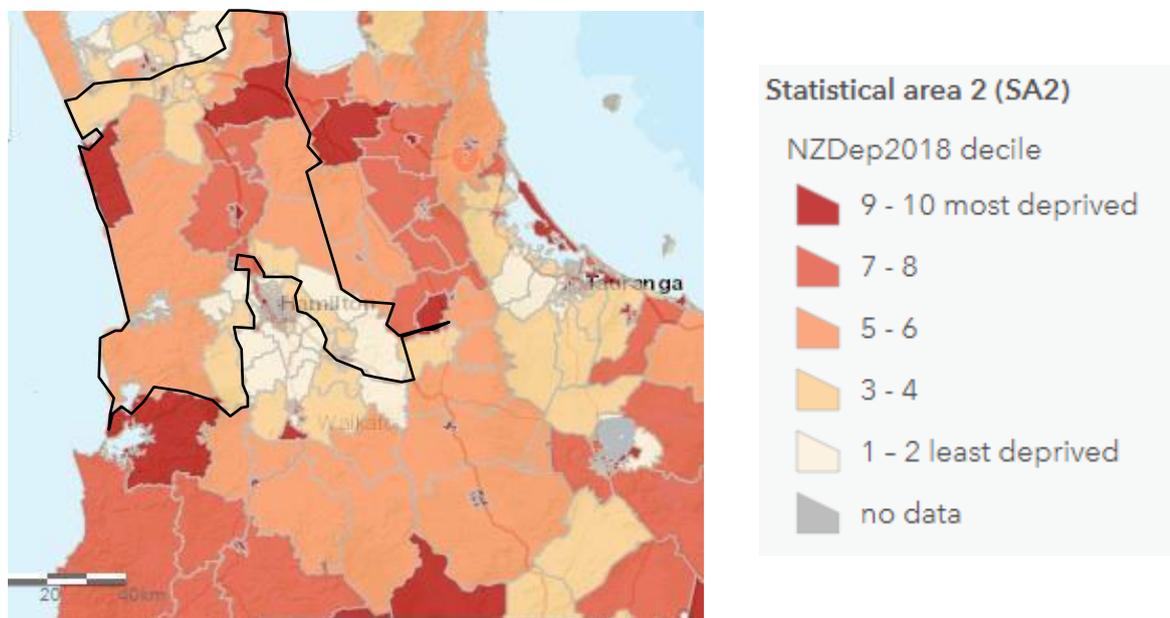


Figure 5 The New Zealand Deprivation Index for statistical areas across the Waikato District

⁴ Environmental Health Intelligence New Zealand. Massey University.
<https://ehinz.ac.nz/indicators/population-vulnerability/socioeconomic-deprivation-profile/>

4. Gambling in New Zealand – An overview

Types of Gambling in New Zealand

The Gambling Act 2003 (GA 2003) has the purpose of controlling the growth of gambling, preventing and minimising harm from gambling and to facilitate responsible gaming and community involvement in decision making, along with ensuring that money from gambling benefits the community. The GA 2003 classifies gambling from Class 1 gambling, which represents low-risk, low stake gambling to Class 4, which represents high-risk, high turnover gambling.

The Racing Industry Act 2020 (RIA 2020) has the purpose of providing effective governance arrangements for the racing industry, facilitate betting on galloping, harness and greyhound racing as well as other sporting events and to promote the long-term viability of racing in New Zealand.

Council can regulate the locations of Class 4 gambling venues, which includes gaming machines located outside of casinos (electric gaming machines (EGMs) such as pokies and slot machines in pubs and clubs) and stand-alone TAB venues, where the primary purpose of the venue is to provide betting services on racing events and sports gambling promoted by the TAB.

EGMs in pubs and clubs are required to be operated by a corporate society which needs a license to own and run the machines and can only be used to raise funds for authorised purposes such as community groups.

The TAB offers the opportunity to bet on horse races, dog races and sporting events. Betting can occur at licensed racing clubs (on-site) and through off-site TAB retail outlets. Off-site retail outlets include stand-alone TAB Venues, where the primary purpose of the venue is to provide betting services, as well as self-service terminals, which are often additional activities within a venue where the venue has a different primary purpose, such as a pub or a motel. The TAB also offers additional online and telephone betting services as well.

Council has jurisdiction over where a stand-alone TAB Venue is permitted to operate. Council does not have jurisdiction over TAB terminals that are provided as an additional service in pubs and motels as well as online and telephone betting, as these activities are permitted under the GA 2003. Other gambling venues such as casino operations and lotteries run by the New Zealand Lotteries Commission are not considered to be Class 4 gambling operations and are therefore not covered under the policy.

Class 4 gambling machines in New Zealand

The latest statistics provided by the DIA website show that as of December 2023, there were 1,004 Class 4 gambling venues and 14,226 non-casino gambling machines⁵

⁵ Department of Internal affairs. Venues and gaming machine numbers. <https://www.dia.govt.nz/gambling-statistics-historical-data-venues-machine-numbers>

operating across New Zealand.

Since 2003 (when the GA took effect), the number of gaming machine venues and individual gaming machines available for use across New Zealand has been steadily decreasing, as shown by Figures 6 and 7 below. DIA data is showing these numbers are still decreasing (December 2022: 1,029 venues and 14,503 machines). However, gambling machine profit has been increasing in both Waikato District and nationally.

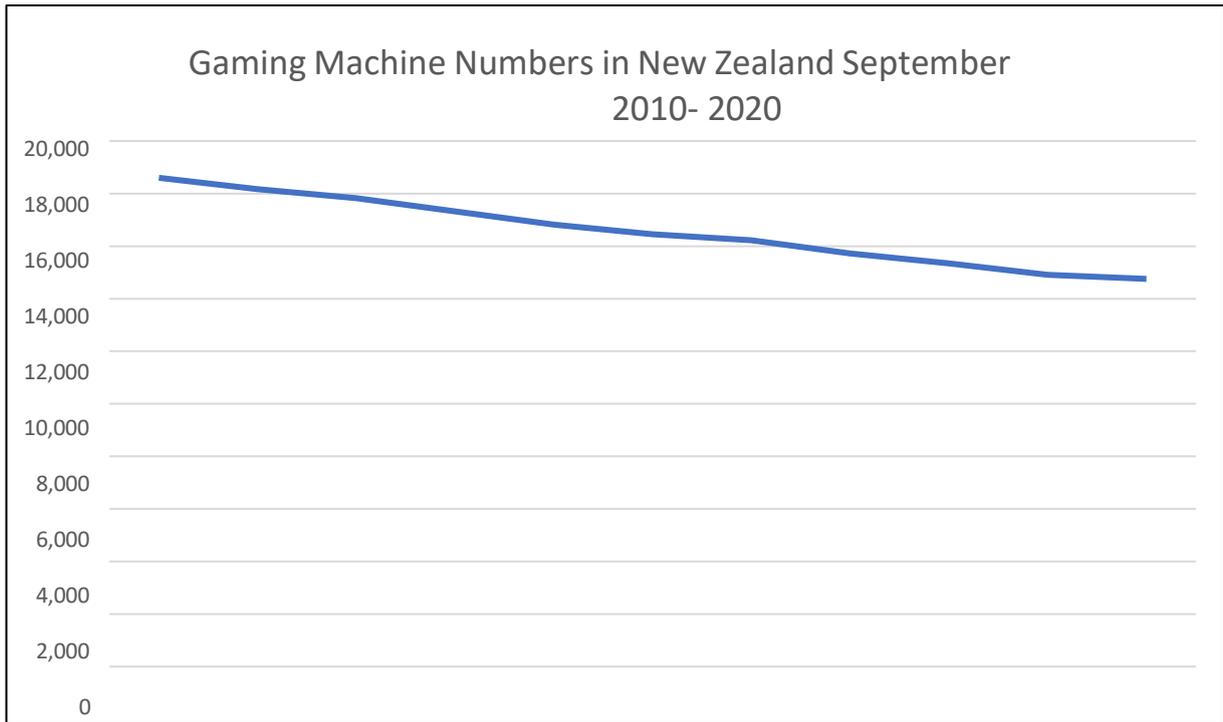


Figure 6 Gaming machine number in New Zealand from September 2010-2020

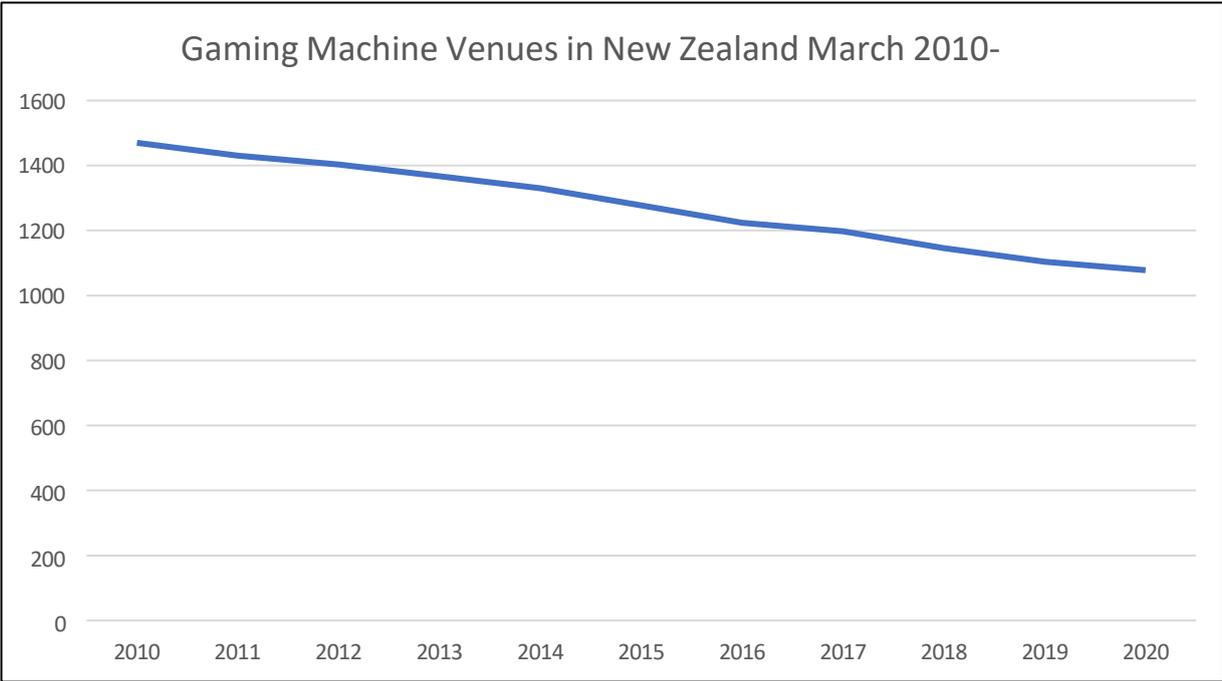


Figure 7 Gaming venue numbers in New Zealand from March 2010-2020

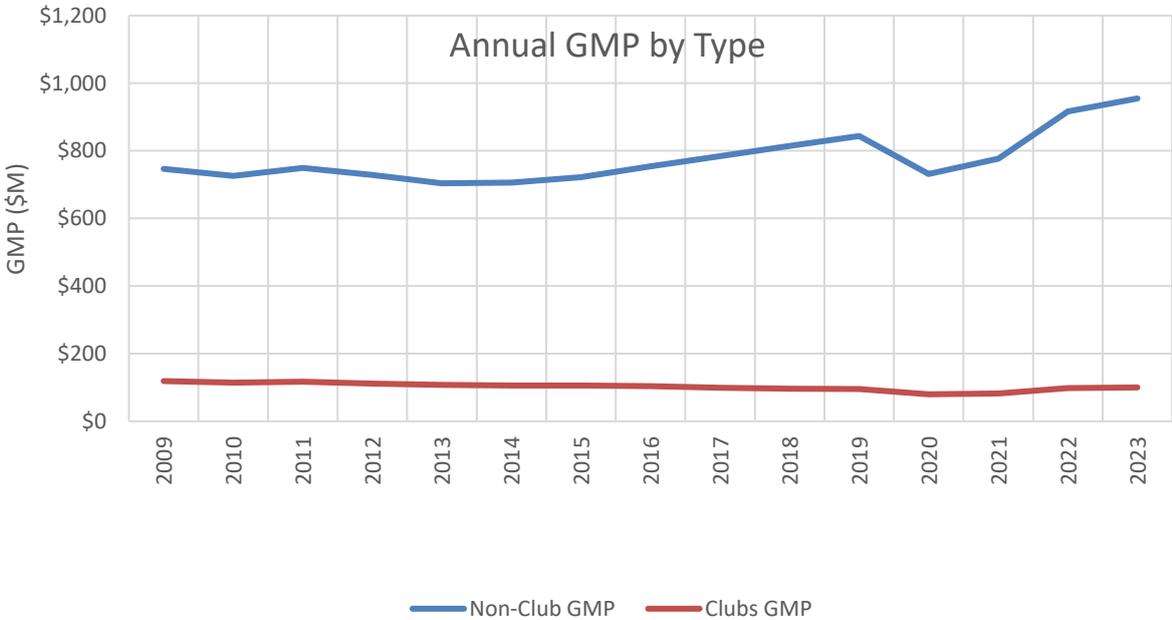


Figure 8 Gaming Machine Profit in New Zealand from September 2010-2023

Number of TAB Venues

The TAB operates approximately 450⁶ TAB stores throughout New Zealand, including stand- alone TAB stores and those within pubs and motels, as well as online and phone services as well.

⁶ TAB NZ. About us. <https://www.tabnz.org/about-us>

Expenditure

On a national scale, New Zealanders have spent between 2.3 and 2.6 billion NZD per year over the past five financial years on the four main types of gambling (Casinos, NZ Lotteries, Class 4 gaming machines and the TAB).⁷ This expenditure is shown in Table 1 below.

The amount spent by New Zealanders on Class 4 gaming machines is consistently higher than any other types of gambling expenditure, with TAB being consistently the lowest over the past five years. Although the number of Class 4 gaming machines and venues is decreasing, the expenditure on Class 4 gambling is still increasing.

The total amount that New Zealanders have been spending on all types of gambling has also steadily increased, apart from casinos and Class 4 gaming machines in 2021/22 financial year. This is thought to be due to the Covid-19 lockdowns across the country where people were unable to go out of their homes for extended periods of time⁸. The NZ Lotteries Commission were not impacted by this, as both of those types of gambling have online service offerings that are able to be used on a mobile device from home. TAB does have online service offerings, however, as no races were being held by the industry to bet on and therefore, they were also impacted by Covid-19.

Table 1: Five-year summary of annual expenditure - all gambling activities⁹

Gambling activity	2017/18 \$m	2018/19 \$m	2019/20 \$m	2020/21 \$m	2021/22 \$m	2022/23 \$m
Tab New Zealand	\$350	\$332	\$315	\$385	\$380	Data not available
NZ lotteries commission	\$561	\$530	\$631	\$694	\$654	\$710
Gaming machine (outside Casinos)	\$895	\$924	\$802	\$987	\$833	\$1,070
Casinos	\$578	\$616	\$504	\$559	\$387	\$604
TOTAL	\$2,384	\$2,402	\$2,252	\$2,625	\$2,254	\$2,385 (excluding TAB)

⁷ Department of Internal Affairs. Gambling expenditure. <https://www.dia.govt.nz/gambling-statistics-expenditure>

⁸ Radio New Zealand. Gambling Spend in 2020 in New Zealand beats record.

<https://www.rnz.co.nz/news/national/438979/gambling-spend-in-2020-in-new-zealand-beats-records>

⁹ Department of Internal Affairs. Gambling expenditure. <https://www.dia.govt.nz/gambling-statistics-expenditure>

5. Gambling in the Waikato District

Class 4 Venue Policy

The objectives of the Class 4 Venue Policy are to:

- control the growth of gambling within the district; and
- minimise the harm caused by gambling; and
- reflect the views of locals in respect to provision of gambling within the district; and
- allow people to participate in Class 4 gambling within the district if they wish to do so.

In creating or reviewing the policy Council may have regard to any relevant matters including the following:

- the characteristics of the district,
- the location of community facilities (schools, places of worship, etc),
- the number of gaming machines that should be permitted to operate at any venue or class of venue,
- how close any venue should be permitted to be to any other venue,
- what the primary activity at any venue should be,
- the cumulative effects of additional opportunities for gambling in the district.

The Class 4 Venues Policy specifies whether a new Class 4 venue can be established within the Waikato District and if so, where it may be located. The policy may also include restrictions on the maximum number of gaming machines that may be operated at a Class 4 venue and a relocation policy.

Council has adopted what is known as a 'sinking lid' policy, where the policy has the intention of slowly reducing the number of gaming machines and venues that are located within the district. This is done through not allowing any new Class 4 venues to be established and restricting existing venues to operate a maximum number of nine gaming machines. Where venues operated less than nine machines at the time this policy came into force, they are restricted to that number under this policy. A relocation provision and a merge provision are adopted as well and are explained below.

Note: The number of machines that an incorporated society could have, was the number they operated at 17 October 2001 (i.e. before commencement of the 2003 Act). The 9 maximum applies to any subsequent applications made after the Act commenced.

Relocation provision

A venue may apply to Council for consent to relocate to a new venue in the following circumstances:

- The proposed new venue has been newly constructed or refurbished for the purposes of the primary activity of the venue;
- The proposed new venue is within the same community of interest as the original venue, and be located in an area with a deprivation index of at least the same or lower than the original venue;

- The proposed venue is not within 100m of any community facilities, or another Class 4 venue.

The maximum number of gaming machines that a relocated venue may operate is the number for which they were licensed to at the original venue.

Merge provision

A venue may apply to Council for consent to merge with another Class 4 gaming venue to increase the number of gaming machines at a club to greater than nine as a result of the clubs merging. Approval of a merge application is within Council discretion and shall have regard to the following¹⁰:

- Merging clubs both hold Class 4 venue licences
- Demonstrate significant history of operating as a club and are currently operating Class 4 gaming machines
- Demonstrate intention to merge into a single club operating at a single Class 4 venue
- Demonstrate it is not a commercial premise
- Demonstrate substantial active membership of the club

The maximum number of gaming machines to be located at the merged club is 5/6 of the total number of gaming machines that the merging clubs are licensed for or to a maximum of 18 machines, whichever is the lower number.

TAB Venue Policy

The objectives of the TAB Venue Policy are to control the growth of gambling within the Waikato District, minimise the harm caused by gambling and reflect the views of the local community in respect of the provision of gambling within the district. In creating or reviewing the policy, Council can have regard to any relevant matter, including the characteristics of the district, location of community facilities (schools, places of worship, etc) and the cumulative effects of opportunities for gambling in the district.

The TAB Venues policy specifies whether a new TAB venue can be established within the Waikato District and if so, where it may be located. The current policy allows new stand-alone TAB venues to be established at Council's discretion, and the location is restricted to areas zoned under the Waikato District Plan to allow commercial activities as permitted activities.

If the TAB wishes to establish a stand-alone TAB venue within the Waikato District, they must apply to Council for consent. Council must then consider the application in accordance with the policy and grant or refuse the consent. In consideration of any consent to permit a new stand-alone TAB venue, Council shall have regard to any undertaking given by TAB to remove TAB terminals (including self-service terminals) from hotels, clubs and/or pubs in the township in which the new stand-alone TAB venue is proposed. Once a consent is granted, it is permanent, and no conditions are permitted to be imposed on the venue.

¹⁰ The Gambling Act 2003. <https://www.legislation.govt.nz/act/public/2003/0051/latest/DLM208652.html>

Gambling in the Waikato District

The amount of money spent on Class 4 gaming machines within the Waikato District in 2023 was \$10.834 (up from \$9.8 million in 2019). Table 2 shows Gaming Machine Profit (GMP) in Waikato District from 2017 – 2023).

Table 2: GMD spend per year in the Waikato District (DIA 2024)

Year	GMD spend per year in the Waikato District
2017	\$8,970,000
2018	\$9,109,000
2019	\$9,829,000
2020	\$8,611,000
2021	\$8,202,000
2022	\$10,445,000
2023	\$10,834,000

Identification of stand-alone TAB venues and Class 4 gaming venues in the Waikato District

There are currently no stand-alone TAB venues within the Waikato District, and there are six pub and club venues offering TAB services within the Waikato District.

There are currently 17 venues hosting 227 Class 4 gaming machines within the Waikato District (which is a reduction from 2021, where the Waikato district had 18 venues hosting 233 machines). 12 out of the 17 venues are located within areas with a deprivation index of 9 (out of a maximum of 10), so the deprivation in the area where the venues are located is very high. The remaining five venues are located in areas of medium to high deprivation (6-8).

The name and location of the venues, as well as the number of gaming machines that the venue hosts within the Waikato District are identified in Table 3 below:

Table 3: Name, location and number of gaming machines within the Waikato District

Venue	Location	Society	Pokies	Social Deprivation Index Number
Backyard Gastro Pub	Whatawhata	Aotearoa Gaming Trust	9	6
Delta Hotel	Ngaaruawaahia	Grassroots Trust Limited	18	9
Elsie's Restaurant & Bar	Tuakau	Manukau Counties Community Facilities Charitable Trust	18	9
Essex Arms	Huntly	The Lion Foundation 2008	18	9
Harbour View Hotel	Raglan	The Lion Foundation 2008	18	9
Huntly RSA	Huntly	Huntly Returned Services Association Incorporated	9	9
McGinty's Turf & Sports Bar	Huntly	Rano Community Trust Limited	18	9
Muddy Waters Irish Pub	Mercer	Pelorus Trust	18	8
Ngaruawahia Golf Club	Ngaaruawaahia	Ngaruawahia Golf Club Incorporated	5	9
Raglan Club	Raglan	Raglan Club Incorporated	18	9
Rangiriri Hotel	Rangiriri	Youthtown Incorporated	12	7
Red Fox Tavern	Maramarua	Bluesky Community Trust Limited	18	9
Taupiri Tavern	Taupiri	The Lion Foundation 2008	9	8
Te Kauwhata Trust Tavern	Te Kauwhata	The Trusts Community Foundation Limited	6	7
The Bull Rider (prev. Bar 29)	Tuakau	Grassroots Trust Limited	9	9
The Miners Tavern	Huntly	Pub Charity Limited	9	9
Tuakau Cosmopolitan Club	Tuakau	Tuakau Cosmopolitan Club Inc	14	9

TAB Terminals in the Waikato District (there are no standalone TAB stores):*¹¹

- Taupiri Tavern – PubTAB self-service terminal only
- Essex Arms (Huntly) – PubTAB Full Service
- Rangiriri Hotel – PubTAB Full Service
- Muddy Waters Irish Bar (Mercer) - PubTAB self-service terminal only
- Harbour View Hotel (Raglan)- PubTAB Full Service
- Elsie's Restaurant and Bar (Tuakau) – PubTab Full Service

¹¹ www.TAB.org.nz

6. Stakeholder engagement

The project team engaged with key stakeholders. They were asked their views on the potential costs and benefits of Class 4 gambling within the communities of the Waikato District, what trends were being seen in regard to gambling within the district, what the impacts of gambling were and whether they agreed with the current policy approach or not. A full list of questions that each stakeholder was asked is provided in Appendix A, along with the full responses from each stakeholder. These stakeholder engagements were mostly conducted through email.

Key Trends

- In the 2023 calendar year, \$10.834m was spent on gaming machines located in the Waikato District. The spend is trending up slightly, consistent with the national trend, and consistent with inflation and population growth. (via GMANZ)
- In 2022, grants totalling \$3,426,232 were made in the Waikato District (see figure below). The grants data does not always align exactly to territorial authority boundaries and the cross-boundary operational nature of many organisations also makes it harder to show a definitive dollar figure.
- The organisations receiving the highest grants in 2022 include Te Awamutu Rugby Sport and Recreation Club, Ngaaruawahia United Football Club, Waikato Regional Property Trust Board, Northern Districts Cricket Association and Waikato Institute for Leisure and Sport.

Table 3 - Amounts granted through EGM profits by Category in 2022 in Waikato District¹²

Category	Amount (NZD)
Sport	1,942,260
Community	769,531
Research and Education	306,735
Health/Welfare/Rescue Services	198,206
Arts and Culture	193,050
Unspecified	16,450

Waikato District Council Staff

The project team spoke with Council's Environmental Health Team Leader. The key findings from the interview are detailed below.

- Council is focused on what their responsibility under the GA 2003, which is to adopt a Class 4 gaming policy, and doesn't have the capacity to locally monitor and be involved in problem gambling intervention services in the district. That is left to the population health organisations such as the central government health providers and contractors, as well as the DIA as the licensor of gambling venue permits.
- There have been no applications for any license relocations or mergers since the

¹² <https://granted.govt.nz/dashboard.html>

2021 was adopted, and no issues or complaints have been raised by license holders or stakeholders.

- The community funding and grants that are given out actually goes back into the community. The current policy approach aims to minimise the harm from gambling while still providing funding for the community.
- It was noted that a gambling license has no expiry date and once approved, it is difficult to take it away.
- Council currently has a sinking-lid approach to control the growth of the number of gaming machines in the district.

Gambling Industry Groups

Key areas of feedback from industry organisations

The Lion Foundation (TLF)

- TLF “aims to return at least 90% of funds back to the community of origin”.
- TLF has seen a recent noticeable decline in proceeds, which they believe are likely attributable to the cost-of-living crisis and new harm minimisation regulations.
 - TLF do have concerns about potential growth in online/offshore gambling.
- TLF (via GMANZ) expressed concern that if the grant funding stream that Class 4 machines help provide was to be reduced or cease, many community organisations would be unable to operate and provide the benefits they currently do.
- Has concerns that Sinking Lid clauses could propel gamblers into online gambling, away from the social aspects and without the harm minimisation regulations.
 - TLF request a “capped policy” rather than sinking lid, which does not encourage growth but allows for funding mechanisms to continue.
- TLF also believes the existing relocation clause is effective.

Gaming Machine Association of NZ (GMANZ)

- While proceeds from non-casino gaming machines have increased, the per adult spend has dropped, which coincides with declining venue and machine numbers.
- Requests we implement a capped policy, rather than the existing sinking lid clause (see points 55-61).
- Also requests we retain the existing relocation clauses (see points 19-29 in their submission).
- The benefits of Class 4 gambling machines are the social benefits and social cohesion of being out in a pub or club, employment (direct/ indirect), community grants and funding, and entertainment. Class 4 gambling is better than online gambling, as it benefits the community and stays within New Zealand.
- There is an increase in expenditure on Class 4 gambling machines, despite the number of machines decreasing across the country. Gambling machines are also more often located in areas that have a higher deprivation rate. There is also a rise in the popularity of online gambling, as individuals can partake at any time without needing to leave their house.
- Venues operate with strict harm minimisation policies in place, and people can exclude themselves from venues if they have identified they have a gambling

- problem (points 36-54).
- Industry believes that the benefits to the community of the funding that gambling machines produce outweigh the harm that gambling causes, and therefore do not support the sinking lid policy. The people who are problem gamblers will just find another way to gamble, likely online in offshore casinos where there is no benefit to the local community.

Intervention and Public Health Services

Key areas of feedback from community and health organisations

Problem Gambling Foundation (PGF)

- Numbers of venues and machines have been dropping in the district, however, there has been a growth in annual gambling machine profit (GMP) which is following national trends.
 - PGF believes that this shows that while some numbers have been decreasing, the rise in GMP shows usage is increasing.
- Although pokies are a legal form of entertainment in New Zealand, they are highly addictive and have been specifically designed to be very absorbing and encourage people to participate in continuous gambling.
- The impact of harmful gambling is diverse, affecting multiple domains of health and wellbeing, including physical, social, emotional, and mental health.
- Section 3 of their submission explains intervention data and shows 45% of clients seeking full intervention support were due to class 4 gaming machines.
- Acknowledged that money does go to community organisations and services, data shows inequities in grant distribution.
- Expressed that instead of looking at funds coming into the community through 'pokie grants', they wanted to highlight the question about where the money was coming from.
- At 31 December 2023, approximately 61% of Class 4 venues in Aotearoa New Zealand are located in medium-high or very-high deprivation areas. In Waikato District, 82% (or 14 out of 17 venues) are in medium-high or very-high deprivation areas. (Page 3)
- Section 4, page 3 of their submission outlined some of the impacts on more deprived communities.
 - *A report commissioned by the DIA, Assessment of the effects of Class 4 gambling on wellbeing in New Zealand, revealed that "one of the most striking features of this report is that [qualitative and quantitative analyses] both indicate that Class 4 gambling tends to magnify community disadvantage. The evidence strongly suggests that it transfers wealth from more deprived communities to less deprived communities". Overall, there is a strong redistributive effect where less deprived communities (decile 1-5) provide 26% of the GMP but receive 88% of the grants. Conversely, more deprived communities (decile 6-10) provide 74% of the GMP but receive only 12% of the grants.*

- Maaori and Pacific peoples are more likely to be moderate- or high-risk gamblers, and together make up almost a third of Waikato District's population, so they ask that consideration is given to this policy in respect of this.
- Support 'sinking-lid' policy but advocate for a 'gold-standard' sinking lid policy, which includes the following three provisions:
 1. A ban on any new venues –no permit to be given to operate any new Class 4 gambling venues in the Council area if that venue proposes having pokies, including TAB venues;
 2. No relocations –if a venue with EGMs closes for any reason, the Council will not permit the pokies to be relocated to any venue within the Council area, and;
 3. No mergers –the Council will not permit any merging of Class 4 pokies to one venue under any circumstances.
- According to research conducted by the Auckland University of Technology's New Zealand Work Research Institute, sinking lid policies are one of the most effective policies at reducing pokie spending, helping reduce problem gambling expenditure by 13%. Moreover, Territorial Local Authorities (TLAs) who adopted restrictions above and beyond those mandated by the Gambling Act 2003 experienced less gambling harm than those TLAs who did not (page 5).

Health New Zealand Te Whatu Ora (provided by Dr Richard Wall, Medical Officer of Health, Waikato, National Public Health Service)

- There is limited information available relating to harm specifically within the Waikato District. Ministry of Health intervention client data gives information on the number of people assisted with interventions for gambling related harm. However, this data will be a significant undercount of the true harm resulting from gambling within the district and should not be used as a true indication of harm. The Ministry of Health report that only 16% of potential clients for gambling support services actually access or present to these services.
- While gambling harm rates have not changed significantly, the adult population has grown. This means that the actual number of people who are experiencing gambling-related harm has increased.
- They advocate that adverse impacts of Class 4 gambling far outweigh the benefits of community funding from gambling machine revenue.
- Approximately one in five New Zealand adults (22%) have been affected at some time by their own or the gambling of others, and the negative impacts can come from behaviours of both problem and low level gamblers.
 - The total burden of gambling harm to New Zealand communities has been found to be greater than common health conditions like diabetes and arthritis. (page 3)
- The retail sector across New Zealand could have gained an estimated \$445 million in 2018/19 if household expenditure on Class 4 gambling was diverted to other uses. This report provides a timely reminder that Class 4 gambling not only has a significant social cost but is also a significant economic drain on the wider community." (page 4).

- Recommend that the sinking lid policy should be further strengthened by not allowing venues to relocate or merge, to further reduce the risk of gambling related harm. Policies that allow club mergers and relocations are not congruent with a sinking lid policy.

Mental Health and Addiction Strategy and Policy - Clinical, Community and Mental Health, Manatu Ora Ministry of Health (provided by Sean-Paul Kearns, Senior Advisor).

- According to the Health and Lifestyles Survey, about 9.6% of adults (about 395,000 people) played gaming machines or pokies at either a pub or club in 2020. (HLS 2020) The % of people who play gaming machines has been steadily decreasing over time. About a fifth (20%) of these players were at-risk gamblers (experiencing harm). More than half (50.3%) of those who played Electronic Game Machines (EGMs) in pubs or clubs at least once a month experienced some level of gambling harm
- Despite the national decline in venues and machines since the Gambling Act came into force on 18 September 2003, the amount lost by gamblers (operator's profits) on class 4 gaming machines has continued to increase. Results published by DIA show that in 2022/23, expenditure (player losses) hit a historic high of \$1.07 billion. (DIA 2024)
- It would therefore seem that a smaller number of people are spending a larger amount of money on class 4 gambling.
- A way to compare year on year expenditure equally is to remove orders of magnitude by taking GMP as a proportion of EGMs which has increased by 40.0% or \$3,292.28. This means players are spending longer hours playing gaming machines, betting more per game or more players are playing pokie machines.
- About one in five people in New Zealand will experience harm due to gambling
 - Harm may include damage to relationships, emotional and psychological distress, disruptions to work or study, loss of income, the financial cost of gambling, and fraud and related crimes. Gambling harm also includes the negative impact on the gambling person's family, whānau and community. Gambling may also cause financial stress and anxiety, and contribute to child neglect and family violence.
- There is evidence that the prevalence of problem gambling increases with increasing density of EGMs. Research shows that there is an average increase of 0.8 problem gamblers (or nearly one) for each new machine in an area. In addition to problem gamblers, those experiencing wider gambling related harms, such as low/moderate risk gamblers and family/whanau/affected others, invariably increase when problem gambling rates increase.

Gambling Venues Policy 2021 Stakeholder Feedback

The project team met with seven out of the eleven identified key stakeholders for interviews. They were asked their views on the potential costs and benefits of class 4 gambling within the communities of the Waikato District, what trends were being seen in regard to gambling within the district, what the impacts of gambling were and whether they agreed with the current policy approach or not. A brief summary is provided below.

Internal Staff Feedback

- Council is focused on what their responsibility under the GA 2003, which is to adopt a class 4 gaming policy, and doesn't have the capacity to locally monitor and be involved in problem gambling intervention services in the district. That is left to the population health organisations such as the MoH, HPA and DHB's, as well as the DIA as the licensor of gambling venue permits.
- It was noted that a gambling license has no expiry date and once approved, it is difficult to take it away.

Gambling Industry Groups

The project team spoke to representatives from the Lion Foundation and New Zealand Racing Board TAB. The key findings from the interview are detailed below:

- The benefits of class 4 gambling machines and TAB venues are the social benefits and social cohesion of being out in a pub or club, employment (direct/ indirect), community grants and funding, and entertainment. Class 4 gambling and TAB venues is better than online gambling, as it benefits the community/ racing industry and stays within New Zealand.
- There is an increase in expenditure on class 4 gambling machines, despite the number of machines decreasing across the country. Gambling machines are also more often located in areas that have a higher deprivation rate.
- Any increase in the statistics around problem gamblers seeking help is thought to be due to an increase in awareness and accessibility of the intervention services available, not an increase in numbers of problem gamblers.
- Venues operate with strict harm minimisation policies in place, and people can exclude themselves from venues if they have identified they have a gambling problem.
- Industry believes that the benefits of the funding that TAB and gambling machines produce outweigh the harm that gambling causes, and therefore do not support the sinking lid policy. The people who are problem gamblers will just find another way to gamble, likely online in offshore casinos where there is no benefit to the local community.

Community Health Groups

The project team met with the Salvation Army Oasis, the Problem Gambling Foundation, and the Waikato District Health Board. The key findings from the interview is detailed below.

- The lower-socio-economic groups are facing the most harm from class 4

gambling machines, and it difficult to get these communities to speak out against a policy decision.

- Class 4 gaming machines are designed to be addictive.
- Support 'sinking-lid' policy but advocate for a 'gold-standard' sinking lid policy, which excludes relocation and merge provisions.
- Do not support the inclusion of relocation and merge provisions within the policy, as they limit effectiveness of a sinking-lid approach.
- An alternative to relocation and merge provisions could be an additional condition that venue relocation and venue merges can only be applied for when the new venue or new merge location is not located in an area of low deprivation.
- Harm from gambling includes relationship and family breakdowns, homelessness, loss of jobs, being kicked out of home, intended self-harm, violence, poverty and strong links with drug and alcohol use.
- Recognises the small benefits of community grants and donations, of which the Salvation Army gets a little bit of, however it was identified that these don't always go back into the community that needs it, or the direct local community around the class 4 gaming venues.
- A key trend in feedback from intervention and health services is that whilst a portion of profits from gaming machine expenditure do go back into the community, it often does not go back to the areas of the community most effected by problem gambling.

Gambling Venues Policy 2018 Stakeholder Feedback

The submissions from the 2018 policy hearing were reviewed, and included 32 submissions, from members of the public, community groups and clubs, businesses, industry groups and community health organisations. Examples of these groups are listed below:

- Northern District Cricket, Waikato Rugby Union
- Ngaruawahia RSA, Grassroots Trust, Trillian Trust, Lion Foundation, Youthtown,
- Raglan Club Inc, Gaming Machine Association of New Zealand, NZ Community Trust
- Waikato District Health Board, Salvation Army Oasis, Problem Gambling Foundation
- Te Kauwhata Community Committee

The key themes from the 2018 policy review were fairly similar to the feedback we received from stakeholders as outlined above. The key themes from the 2018 policy review and the main points of contention are summarised below.

- There were a wide range of different stakeholders, from concerned members of the public, to community trusts, clubs and gaming venues and key stakeholders such as Gaming Machine Association of New Zealand, Waikato District Health Board and the Lion Foundation.
- Generally, the stakeholders that form part of the Class 4 gambling industry (Lion Foundation, Gaming Machine Association, RSA) are against the policy as it is restrictive and doesn't allow for growth and want a more flexible policy that allows increases in gaming machine numbers by discretion of Council. They believe this approach would mean that an increase in the number of Class 4

gambling machines will likely lead to an increase in community funding, and therefore a better outcome for the community.

- The responses from concerned members of the public were either in agreement with the policy of slowly phasing out gaming machines, or they were against the policy as they believed it wasn't restrictive enough and wanted Class 4 gaming machines completely banned.
- The Te Kauwhata Community Committee submission was mindful of the harm that gambling can cause, but also discussed the benefits that grant funding from the proceeds of Class 4 gambling machines provides.
- The stakeholders that represent the public health and intervention services for gambling (WDHB, Problem Gambling Foundation, Salvation Army Oasis) were supportive of the 'sinking-lid' policy in lieu of being able to ban Class 4 gambling machines completely. They were not supportive of the relocation and merge provisions, as they consider that creates too many loopholes for the industry to maintain and potentially grow their service offering within one location.

7. Potential social benefits of gambling

Entertainment and Social Interaction

Class 4 gaming machine and TAB gambling can be an entertainment activity from which people derive personal enjoyment and positive social effects. Feedback from the Lions Foundation was that Class 4 gaming machines offer an entertainment activity in social venues such as pubs and clubs.

The feedback from the Problem Gambling Foundation (PGF) is that whilst the venues that host Class 4 gaming machines are social venues, the Class 4 gaming machines are separated from the social environment of the bar or club floor to a specific gaming area. Further, playing on the Class 4 gaming machines is an individual activity and very isolating for the player.

Feedback from all stakeholders was that the expenditure on online gambling is increasing. Online gambling offers easily accessible entertainment for the online user, however, does not subsequently result in socialisation with others or community cohesion.

Employment opportunities

The existence of Class 4 gaming and sports and racing betting means that some employment opportunities exist for the corporates societies administering the gaming machines, venues operating them, and the servicing industries.

However, it can be argued that employment in the gambling industry, and economic activity as a result of gambling, takes employment and spending from the other sectors of the economy rather than providing significant benefits.

Racing Industry and NZ Racing Codes

A minimum of 80% of the net proceeds from TAB's gaming machines, plus surplus after operating costs, expenses, and gaming machine distributions, is available for distribution to benefit the racing industry, plus the three NZ racing codes, being New Zealand Thoroughbred Racing, Harness Racing New Zealand, and Greyhound Racing New Zealand. In 2021/22, distribution to racing codes from sports betting was \$140.2 million. This distribution of betting proceeds going back into racing codes supports those who are employed by the industry. There was an additional \$1.6m in grants going to amateur sporting organisations in New Zealand.¹³

Note: The impact of the policy can have on this type of gambling within the district currently is minimal due to no standalone TAB venue existing.

¹³ <https://www.tabnz.org/reports>

Community funding and grants

There are two types of societies that operate Class 4 gaming machines:

- Those that apply funds to their own purposes (e.g. clubs)
- Those that make grants to other bodies for community purposes.

Currently, these societies are legally required to allocate a minimum of 40% of gross proceeds back into the community. The societies do not necessarily advertise the availability of funding; however, they are required to advertise the beneficiaries annually. The largest financial benefit of gambling is the distribution of funds to community and sports groups.

The government also receives income through gambling taxes, plus it manages the problem gambling levy which helps pay for problem gambling intervention services.

8. Potential social costs of gambling

Problem gambling

For those that do develop a gambling problem the costs can be far reaching and are not exclusive to the problem gamblers themselves.

The Gambling Act defines a problem gambler as “a person whose gambling causes harm or may cause harm” meaning harm or distress of any kind arising from, or caused or exacerbated by, a person’s gambling. In addition, the Problem Gambling Foundation of New Zealand (PGFNZ) states that:

- **Problem gambling** refers to gambling that significantly interferes with a person’s life, especially with their finances, their job, and their relationships with partner, family, and friends.
- **Pathological gambling** is the most severe form and is Classified as a mental disorder similar to drug abuse. It includes features of tolerance, withdrawal, diminished control, and relinquishing of important activities.
- **At-risk gambling** refers to a level of gambling that is not currently causing significant financial or emotional harm to the gambler but is likely to become problem gambling if it continues.

PGFNZ and Ministry of Health (MoH) states that gaming machines are the most harmful form of gambling in New Zealand which accounted for almost 50% of those seeking help.¹⁴ According to the DIA, Pokies, also known as electronic gaming machines (EGMs) are one of the most harmful forms of gambling. They are the leading reason that people seek gambling-related help in Aotearoa.¹⁵

Spectrum of continuous costs from problem gambling

About 9.6% of adults (about 395,000 people) played gaming machines or pokies at either a pub or club in 2020. The percentage of people who play gaming machines has been steadily decreasing over time. About a fifth (20%) of these players were at-risk gamblers (experiencing harm). More than half (50.3%) of those who played EGMs in pubs or clubs at least once a month experienced some level of gambling harm.¹⁶

The 2020 Health and Lifestyles Survey¹⁷ found that nationally 2.9% of adults met the PGSI (Problem Gambling Severity Index) criteria for low-risk gambling, 1.6% for moderate-risk and problem gambling combined. These figures represent around 119,000 low-risk gamblers, 65,000 moderate-risk and problem gamblers in New

¹⁴ <https://pgf.nz/understand-gambling/pokies>

¹⁵ <https://www.dia.govt.nz/Gambling-Reducing-Pokies-Harm>

¹⁶ <https://kupe.healthpromotion.govt.nz/#!/gambling/gambling-harm>

¹⁷ <https://kupe.healthpromotion.govt.nz/#!/gambling/gambling-harm>

Zealand. These results indicate that in total 4.5% of New Zealand adults (approximately 184,000 people) had experienced at least some level of individual gambling harm in the last 12 months.

Māori, Pacific peoples, and people on lower incomes continue to disproportionately experience gambling harm. This is particularly true of Māori who are approximately 3.13 times more likely to be moderate-risk or problem gamblers than non-Māori and non-Pacific peoples. Pacific peoples were 2.56 times more likely to be moderate-risk or problem gamblers than non-Māori and non-Pacific peoples.

Approximately one in five New Zealand adults (22%) have been affected at some time by their own or the gambling of others.¹⁸ Gambling harm can be experienced not only by people who gamble but also by their friends, families, whānau and communities. Research suggests that between 5 and 10 other people are adversely affected by a person who has severe problematic gambling behaviour.¹⁹

Problem gambling trends with the Waikato District

There was a consensus from all stakeholders interviewed by the project team that whilst the number of gaming machines had not increased in the district, expenditure was steadily increasing.

The majority of the community funding from gaming machine expenditure comes from a small number of people, the majority of which are gaming in medium-high to very-high deprivation areas.

The most DIA gaming machine profits quarterly dashboard shows that most of the venues in the Waikato district are in areas of very high deprivation²⁰ (deprivation index of 9-10). The remainder are in areas of high deprivation, or adjacent to areas of high deprivation.

DIA estimates that 30% of gaming expenditure comes from severe and moderate risk gamblers. Waikato District had an average Class 4 gaming machines loss of \$122 per person for the 2023 calendar year (see the comparative table in the appendices), however this does not show the true impact of the monetary loss, as the number of moderate and problem gamblers is estimated to be 1.6% of the population²¹, and the majority of Class 4 gambling in Waikato District is happening in higher deprivation areas.

Mitigating problem gambling

There are a range of problem gambling services available throughout New Zealand. These are funded through income generated by gambling through the Problem

¹⁸ Thimasarn-Anwar, T., Squire, H., Trowland, H., & Martin, G. (2017). Gambling report: Results from the 2016 Health and Lifestyles Survey. Health Promotion Agency Accessed 13/3/24 from: <https://www.hpa.org.nz/research-library/research-publications/new-zealanders-participation-in-gambling-results-from-the-2016-health-and-lifestyles-survey>

¹⁹ Ministry of Health. Strategy to prevent and minimise gambling harm 2019/20 to 2021/22. Wellington; 2019.

²⁰ Refer back to Table 2

²¹ <https://kupe.healthpromotion.govt.nz/#!/gambling/gambling-harm>

Gambling Levy.

It is also important to note here that there is likely to be a difference between the number of people with gambling problems, and the number who have sought help for those problems.

Class 4 machines are required to:

- provide information on game characteristics, including the odds of winning, and individual play such as cash spent and duration, and
- display the current time at all times during game play, and interrupt play every 30 minutes, then inform the player of the time spent playing and asks whether they wish to continue.

DIA guidelines require that all gambling operators fulfil their host obligations to help prevent or minimise harm from gambling. This requires that the venue must:

- Gamblers are now only permitted to make one cash withdrawal per day. If a second cash withdrawal is made, the venue staff are required to talk to the player about their gambling and complete a two-page report about the person's gambling. That report must then be reviewed by the venue manager within seven days.
- ATMs are excluded from all gaming rooms. ATMs at gaming venues must be in direct line of sight from the main bar area or main customer service area.
- Gaming machines cannot be visible from outside the venue.
- Venue staff are required to undertake three formal sweeps of the gaming room per hour and keep a detailed record of each sweep.
- Limits exist on the type of venues that can host gaming machines. The primary activity of all gaming venues must be focused on persons over 18 years of age. For example, it is prohibited to have gaming machines in venues such as sports stadiums, internet cafes, and cinemas.
- There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.
- There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won. The maximum stake is \$2.50. The maximum prize for a non-jackpot machine is \$500.00. The maximum prize for a jackpot-linked machine is \$1,000.00.
- All gaming machines in New Zealand have a feature that interrupts play and displays a pop-up message. The pop-up message informs the player of the duration of the player's session, the amount spent, and the amount won or lost. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.
- Gaming machines in New Zealand do not accept banknotes above \$20.00 in denomination.
- All gaming venues have a harm minimisation policy.
- All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.
- All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.

- All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
- Any person who advises that they have a problem with their gambling is required to be excluded from the venue.
- It is not permissible for a player to play two gaming machines at once.
- All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.
- The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).
- It is not permissible to use the word "jackpot" or any similar word in advertising that is visible from outside a venue.

DIA also recommends a number of resources which are freely available and can help identify gambling harm and provide information to support the venue in their responsibilities as a gambling host.

9. Conclusion

The potential social benefits of providing opportunities for Class 4 gambling machines and TAB betting are identified as providing entertainment and social interaction, providing some employment opportunities and providing community funding and grants.

The costs of providing opportunities for Class 4 gambling machines and TAB betting are problem gambling and wider follow-on social effects such as job loss, homelessness and family violence, financial issues and ongoing habits. These impacts can be inter-generational.

Gaming machine expenditure is a key source of funding for community groups. The majority of gaming machine expenditure comes from a small number of people, the majority of whom are gaming in medium-high to very-high deprivation areas in the district.

Appendix A – Engagement Stakeholder questions and responses

Questions for Council Environmental Health Team leader:

1. How many Class 4 gaming machines are currently operating within the district and where are they located?
 - There are 19 venues and 243 gaming machines across the district (2018) – still the case?
2. What are the trends being seen with Class 4 gaming machines across the district? From your position is usage increasing or decreasing, and why do you think that is occurring?
3. How many TAB locations are there within the district and where are they located?
 - There are not any standalone TAB locations in the district (2018) – still the case? Where are people TAB gambling from (online, outside of the district)?
4. What are the trends being seen with TAB gambling across the district? From your position, is usage increasing or decreasing, and why do you think that is occurring?
5. What trends are being seen in the district in regard to harm from gambling?
6. The department of internal affairs and the Problem Gambling Foundation have statistics on gambling machines and TAB expenditure in the Waikato District – ie how much money do Waikato residents spend per year on gambling in these ways?
 - Do Council have their own statistics and monitoring on Class 4 gambling in the district?
 - Can this expenditure be directly related to the number of gambling machines available across the district?
7. Do Council have statistics on how many people have sought help for gambling across the district (annually)?
8. What actions are being taken across the district to combat problem gambling? And what are the success rates of these actions.
9. What is the availability of intervention services in the area?
 - How many are there?
 - What is the service capacity?
 - What are the success rates of these services?
10. What do Council are the benefits of having gaming machines and TAB venues available for use across the district?
11. Overall, from a Council perspective how does problem gambling impact the community
12. We have identified some key stakeholder who we would like to speak to. Is there any other organisation you think we should contact or any more appropriate stakeholders?

Questions for Industry Groups (Lions Foundation/ TAB):

1. How does the Lions Foundation/ TAB tie in with the gambling industry?
2. Does most of your funding come from Class 4 gambling?

3. How many machines does Lions Foundation own in the Waikato District and where are they located?
4. How many TAB locations are currently operating within the district and where are they located?
5. What trends are being seen with Class 4 gaming machine/ TAB gambling across the district? From your position, is usage increasing or decreasing, and why do you think that is occurring?
6. The DIA and the Problem Gambling Foundation have statistics on gambling machine and TAB expenditure in the Waikato District – how much money do Waikato residents spend per year on gambling in these ways? Do TAB have their own statistics and monitoring on TAB gambling within the district?
7. What trends are being seen in the district in regard to harm from gambling?
8. What are the benefits of having gambling machines available for use across the country?
9. Do you work with any intervention service within the district?
10. Overall, from a Lions/ TAB perspective, how does problem gambling impact the community.

Questions for intervention/ public health groups (WDHB, PGF and Te Manatu Ora):

1. What interest does your organisation have in the gambling industry?
2. From your perspective, is the usage of Class 4 gaming machines increasing or decreasing?
3. What trends are being seen in the district in regard to harm from gambling?
4. Are there any benefits of having gambling machines available for use across the district?
5. Do you work with any of the other intervention services in the area? Do you have any stats on problem gambling presentations in the Waikato District?
6. Overall, from a PGF/ Salvation Army/ WDHB perspective, how does problem gambling impact the community?
7. Do you agree with the sinking-lid policy approach?

Appendix B – Comparative tables for policies and demographic

Table 4: Class 4 Gambling and TAB Venue Policies comparison

Council	Last reviewed	Sinking Lid Clause?	Caps on machines	Relocation Clause(s)	Merging Clause (and %)	TAB clauses	Any other points
Waikato District Council	Dec 2021	Y, and no consideration for apps for more machines	9	Yes, with conditions	Yes, 5/6 of combined licenses, to a max of 18	As per DP Standalone license app must have regard to removal of terminals from other venues	
Hamilton City Council	Oct 2023	Yes, except in certain circumstances.	None specified.	No, except in certain circumstances of building safety, lease renewal issues, moving within permitted zoning.	Yes, max machines lesser of 24 or sum.	No further TAB venues. No relocation permitted. Signage can include corporate colours, logos and signage. Board venues may host class 4 gaming machines.	
Waipa District Council	Oct 2023	No, can lodge app at any time.	9	Yes, with conditions.	No reference to merging.	Allows new venue applications.	Cap of 232 machines district-wide
Auckland Council	Oct 2020	Yes, and no increase of gaming machines.	None specified.	No reference to relocation.	Yes, only if club venues and 5/6 of combined licenses.	Venue cap at 43 which was number of venues at adoption. No sinking lid clause. Relocation permitted.	
Thames-Coromandel District Council	Dec 2020	Yes, and no increase of machines.	None specified.	Yes, following location guidelines.	Yes, max machines shall be sum or less.	No new TAB venues. Relocation permitted.	

Council	Last reviewed	Sinking Lid Clause?	Caps on machines	Relocation Clause(s)	Merging Clause (and %)	TAB clauses	Any other points
Matamata-Piako District Council	July 2022	No, and allows increase of gaming machines	New venues 9. Venues with consent on 17 Oct 2001 max of 18.	Yes, with conditions.	Yes, sum of machines of all merging venues. Max of 9 machines does not apply. Shall not exceed 18 machines if no consent on 17 Oct 2001 or 30 with consent on 17 Oct 2001.	One TAB venue per township. New venues must meet location requirements and District Plan requirements.	Cap of 15 venues district-wide and 201 machines district-wide. Must discuss proposed application with affected parties within 250 m before submitting.
Hauraki District Council	Sept 2020	No, can establish new venue if below venue and gaming machine district cap.	New venues 9. Venues with consent on 17 Oct 2001 operate notified number of machines, cap doesn't apply.	Yes, due to extraordinary circumstances.	Yes, max machines lesser of total machines or 18.	TAB venues not operating gaming machines are permitted subject to operative Hauraki District Plan.	Cap of nine venues district-wide and 69 machines district-wide.

Demographic Comparative Table – Class 4 Gambling Spending

Council	Population 2023	Number of Class 4 Machines 2023	People per gaming machine	Number of Class 4 Venues 2023	Spend per annum 2023 (Yearly gaming machine profits - expenditure or player loss on Electronic Gaming Machines in the Class 4 Sector)	Average spends per person per annum
WDC	88,900	227	392	17	\$10,833,899.30	\$122
Hamilton	185,300	380	488	25	\$28,461,565.22	\$154
Waipa	61,100	208	294	15	\$10,356,372.02	\$169
Auckland	1,739,300	3,165	550	215	\$312,278,715.31	\$180
Thames-Coromandel	33,700	246	137	20	\$12,069,491.40	\$358
Matamata-Piako	37,700	140	269	10	\$7,318,927.07	\$194
Hauraki	22,400	119	188	9	\$5,992,318.00	\$268