

**Submission  
No 6**

## **INQUIRY INTO IMPACT OF GAMBLING**

**Organisation:** Presbyterian Church of Australia in NSW

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Submission to

The NSW Parliament  
Legislative Council  
Select Committee  
Inquiry into the Impact of Gambling

From

The Presbyterian Church of Australia  
In the State of NSW

PO Box 2196, Strawberry Hills, NSW, 2012

## Who we are

The Presbyterian Church in Australia in the state of NSW (PCNSW) consists of 186 pastoral charges spread through NSW. It is a community of about 35,000 people and has congregations from nine different non-English speaking cultures. Beyond its congregational ministries, the PCNSW operates schools, aged care facilities, pre-schools and provides social services and chaplaincy care in a wide range of communities in the state. The Presbyterian Church has been part of NSW society since 1803, and helped to form the Presbyterian Church of Australia in 1901.

This submission has been prepared by the Gospel, Society and Culture Committee of the PCNSW Assembly. For further information contact the convener of the committee, Rev. Dr. John McClean.

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## Our Position

The PCNSW supports the introduction of stricter regulations on the use of electronic gaming machines (EGMs), and respectfully asks the Select Committee to recommend the introduction of legislation in this State that will:

1. enforce mandatory pre-commitment measures associated with EGMs;
2. limit individual bets on EGMs to a maximum of \$1;
3. limit access to cash withdrawals from ATMs at venues where EGMs are installed.

# Our Reasons

## *1. Christian convictions*

We want to obey the instruction of our Lord Jesus to love our neighbour as we love ourselves (Matthew 22:36-39). This leads us to speak about gambling in two ways. Firstly, *we speak against gambling* in principle, because it is motivated by a desire to gain something for oneself at the expense of another. Gambling promises financial gain for no productive work, and it encourages greed and covetousness, none of which are expressions of genuine love for our neighbour. Secondly, *we speak for those people in our community* who are vulnerable to the risks associated with addictive gambling - individual gamblers, and their families, friends and wider communities who are deprived of their needs as a result of financial loss through gambling. We count protection of the vulnerable as more important than protection of the vested interests of an industry that profits only through the pain and loss of others. We call on this Government to do the same.

## *2. EGM use contributes disproportionately to the personal and social harms from gambling, and should therefore be subject to tighter regulation*

People who play EGMs are more at risk of harm than are people who participate in other forms of gambling. Surveys indicate that 15% of people who regularly play EGMs are 'problem gamblers' who bear the cost of 40% of spending - or, more accurately, losses incurred - on these machines.<sup>i</sup> Recent research indicates that high-value jackpot machines tend to intensify betting behaviour, which places users at increased risk of loss.<sup>ii</sup> Further, EGM losses are greater in communities already vulnerable due to other circumstances such as low income, mental illness or disability.<sup>iii</sup> The greatest gains in terms of reducing social harm from gambling can be made by tightening the regulation of the use of EGMs.

*3. EGM pre-commitment schemes should apply to all machines, and be mandatory, not merely voluntary.*

Voluntary pre-commitment schemes tend to focus on ‘problem gamblers’ alone, and rely on the individual recognising their need for help. Voluntary schemes may not capture everyone who requires support in minimising the harm caused by an existing gambling problem, and they do not protect so-called “recreational gamblers” from the risk of developing an addiction. All gamblers will benefit from participation in a mandatory scheme. For the same reason, pre-commitment technology should be installed on all machines, not only on high speed, ‘high loss’ machines.

*4. Governments are responsible for making laws that benefit citizens*

Governments in Australia have a history of making legislation that aims to protect individuals from harm caused by the acts or omissions of themselves and/or others. Road rules, legislation mandating the plain packaging of tobacco products, and the ‘lockouts and last drinks’ laws recently introduced in NSW are examples of measures introduced by governments in this country to protect citizens. Gambling habits should not be exempt from the watchful eye of a responsible government. Rather, in light of the recognised harms associated with gambling - and in particular EGMs - effective regulation should be a priority.

*5. The Government’s responsibility to act in the best interests of its citizens is incompatible with reliance on revenue from the gambling industry*

We recognise that NSW Government’s revenue from gambling is significant, and that most of it comes from EGM use.<sup>iv</sup> However, we also note that the social cost of gambling in Australia has been conservatively estimated at \$4.7 billion each year.<sup>v</sup> This cannot be disregarded as mere ‘collateral damage’ associated with the earning of government revenue. We respectfully ask that this Committee recommend that the NSW government begin the task of seeking other ways to fund public expenditure.

<sup>i</sup> Australian Productivity Commission (2010). Gambling, *Report No. 50*, Canberra. Retrieved 13 February 2014 from <http://www.pc.gov.au/projects/inquiry/gambling-2009/report>

<sup>ii</sup> Gambling Research Australia (2014). The Impact of Electronic Gaming Machine Jackpots on Gambling Behaviour. Retrieved 17 February 2014 from <http://www.gamblingresearch.org.au/find/publications/>

<sup>iii</sup> Australian Association of Social Workers (2012). Gambling Position Statement, Canberra. Retrieved 15 February 2014 from <http://www.aasw.asn.au/social-policy-advocacy/position-papers/position-papers>

<sup>iv</sup> Government Statistician, Queensland Treasury and Trade (2012). Australian Gambling Statistics, 28th Edition. Retrieved 13 February 2014 from <http://www.oesr.qld.gov.au/products/publications/aus-gambling-stats/index.php>

<sup>v</sup> Australian Productivity Commission (2010). Gambling.