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Justice and Community Safety Directorate
Parliament House
PO Box 6100
Canberra ACT 2600

Via email: LRGPolicy@act.gov.au

Dear Justice and Community Safety Directorate

Submission: Electronic gaming machine bet and credit limits

The ACT Council of Social Service (ACTCOSS) welcomes the opportunity to make a submission to the Justice and Community Safety Directorate's Discussion Paper - Lowering bet and credit limits for electronic gaming machines.

ACTCOSS represents not-for-profit community organisations and advocates for social justice in the ACT.

As part of its work on social justice and through its membership of the Canberra Gambling Reform Alliance, ACTCOSS works to reduce gambling harm in the Canberra community. The ACTCOSS CEO is a member of the ACT's Gambling and Racing Commission Advisory Committee.

ACTCOSS is broadly supportive of the Discussion Paper's proposed changes to reduce harm from gambling. Lowering the bet limit on ACT poker machines from \$10 to \$5 and introducing a \$100 load-up limit will be implemented alongside the proposal of a Central Monitoring System (CMS) to support clubs running gaming machines to implement these measures.

This is a welcome initiative as part of the ACT's Government commitment to reducing gambling harm and protecting vulnerable consumers. The social and financial costs of gambling continue to severely impact ACT individuals, families and wider community and the ACT Government must do more to protect Canberrans from gambling harm.

These measures respond to long standing advocacy by ACTCOSS, the Canberra Gambling Reform Alliance (CGRA) and other stakeholders campaigning to reduce gambling harm in the ACT. The social cost of problem gambling in Australia over one year has been estimated to be between \$4.7 and \$8.4 billion. The social (non-financial) costs per problem gambler were estimated to be between \$10,000 and \$30,000.¹ In the ACT total gambling losses in the ACT in 2017-18 amounted to \$242.7 million or \$749 per capita.²

People experiencing domestic and family violence, older people, people with disability, people from culturally and linguistically diverse backgrounds and Aboriginal and/or Torres Strait Islander peoples are at a higher risk of experiencing gambling harm.

The measures proposed by this discussion paper are those which research shows would have the greatest impact on reducing gambling harm. Reducing the bet limit to \$5 will halve the amount of money a person could theoretically spend and lose in one hour of play from \$12,000 to \$6,000.

ACTCOSS supports these recommendations which are based on the best of industry expertise and local knowledge of problem gambling's community impacts.

However, based on consultation with organisations dealing with Canberrans experiencing gambling harm, including at the Roundtable Community Sector Consultation held in October 2021 by the Gambling & Racing Commission, we believe they should go further with:

1. The bet limit reduced to \$2 per bet, and
2. A \$50 load up limit

Community clubs are also a significant consideration in the implementation of these measures. Over 99% of the ACT's gaming machines are in community clubs. Community clubs have in many cases come to unsustainably rely on income earned to the detriment of problem gambling. By reducing risks of gambling harm, we can ensure that community clubs become safer, more inclusive and welcoming spaces for all.

We recognise that there will be challenges in implementing the proposed measures given the varying size and financial success of clubs. However, in noting that many clubs gain a substantial revenue stream from pokies, there are also several pokie-free clubs, and we look forward to seeing a higher uptake of the government's poker machine surrender initiative.

A pokie-free environment may make it increasingly difficult for smaller clubs to sustain their finances with alternative revenue. However, we firmly believe that there is a broad need for clubs to take responsibility for minimising and preventing gambling harm. ACTCOSS recommends that the government seriously considers offering targeted support to small community clubs delivering clear social good. The definition of a small club will need to be established in consultation with industry and community sector.

There is also merit in discussing the introduction of CMS in a way that would assist the tracking of levels of problem gambling behaviour in clubs, to assist not only clubs to establish harm mitigation strategies but also for individual problem gamblers to have the ability set their own limits and manage their addiction. However, discussion of the system's introduction while important, is a second-order priority. The main measures that will reduce gambling harm are the ones proposed and it is important that these are progressed quickly.

Whilst we commend the introduction of reduced bet limits and CMS as soon as possible, we are also eager to see further action based on the recommendations consistently produced by experts in gambling harm reduction. We are particularly keen to see the introduction of mandatory pre-commitment in all venues and banning of poker machine operations between 2AM and 10AM.

The implementation of the measures outlined in the Discussion Paper will play a significant role in urgently addressing gambling harm in our community. ACTCOSS urges the ACT Government to commit to lower bet and credit limits.

ACTCOSS would welcome the opportunity to discuss this submission further with the directorate. ACTCOSS can be contacted on (02) 6202 7200 or by email at adam.poulter@actcoss.org.au.

Yours sincerely,



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