

Public Exhibition Report

Gambling Harm Minimisation Policy



June 2024

Ten submissions were received during a 4-week public exhibition period from 27 May to 21 June 2024. Nine submissions were received from private individuals and one submission was received from a gaming venue. The below table summarises and themes this feedback based on policy focus areas, provides a response to the feedback, and includes any changes made to the policy as a result.

Focus area	Public comment summary	Council response and any changes to policy (changes in bold)
Planning and regulation	Council should try to ensure the total number of EGM[s] in Casey is not increased.	Council contributes to the planning and decision-making processes for electronic gaming machine (EGM) venues. The regulation of the gambling industry, including EGM venues, sits with the Victorian Gambling and Casino Control Commission (VGCCC). The Policy includes advocacy objectives for changes to municipal electronic gaming machine (EGM) caps and how they are determined within any EGM cap reviews led by the VGCCC. The review of the Casey Planning Scheme will look at further strengthening decision guidelines and the social and economic impacts assessed when considering venue applications.
	[The Policy] should look at ways to reduce the number of EGMs in Council area.	
	Any applications must show a strong commitment to supporting local charities etc. to help counteract negative effects of gambling. If not very strong commitment it should be denied.	Community contributions are required as part of an EGM licence managed by the VGCCC. Council will advocate to the VGCCC for stronger oversight and regulation of community contributions by gaming venues, which includes greater transparency around contributions, ensuring they result in a direct community benefit.
	The policy states Council will advocate for “greater oversight and regulation of EGM venue community contributions”. The community contribution system certainly needs to be overhauled but what would Council be asking for?...Would	



	Council's advocacy include changing the contribution system to ensure money isn't simply reinvested into venues?	
	Regarding Planning and Regulation, I would want to see Council again take the bold step of updating the Casey Planning Scheme for the banning of any new EGM facilities, and if possible, the phasing out of all EGMs in existing facilities over the course of the upcoming years (giving time for these current businesses to not renew their leases, etc.)	Council does not have the authority to ban new or existing EGM venues outright. Council commits to reviewing the Casey Planning Scheme and planning policy to further strengthen decision making guidelines on the locational characteristics where EGM venues are discouraged. 5.2.3(a) of the Policy commits Council to not support any new or existing EGM operating venues or organisations on Council-owned land (excluding existing lease agreements).
	The policy relies on soft language such as 'discourage'. This is ambiguous and suggests a lack of commitment. Amendments to the Planning Scheme would help to ensure change occurs, such as prohibiting venues in certain areas or circumstances. It could also require that applicants provide a social impact assessment with all gambling venue applications.	Council is taking a significant step towards embedding a public health approach to address harm from gambling. Through internal consultation, Council has outlined policy initiatives that are impactful and achievable. Council will revisit its policy position through the life of the Policy.
	Council can discourage planning permits in the pre-application stage, however council should not approve planning permits for new EGM venues where a net social or economic benefit for the local community benefit has not been demonstrated and the policy commitments should reflect this. I believe this is a distinction that this policy can make.	The review of the Casey Planning Scheme will look at further strengthening decision guidelines and the social and economic impacts assessed when considering venue applications.
	Differentiating Not-for-Profit Venues: Differentiate between not-for-profit clubs and for-profit venues. Exempt not-for-profit clubs from certain regulatory requirements due to their positive community contributions and existing accountability measures.	The policy takes a public health approach recognising gambling activities have the potential to cause harm to the community, whether through not-for-profit club or for-profit venues.

Advocacy	In Advocacy, I would highly encourage Casey Council to take the bold step to push for the complete banning of all EGMs in Victoria (at State level) and Australia (at Federal level).	Council will continue to advocate for greater regulation and reform of the gambling industry and investigate impactful advocacy items throughout the life of the Policy. As done recently, Council will continue to seek out opportunities to join forces with other councils and organisations where advocacy agendas align. Membership within relevant advocacy groups operating in this space will be considered on a case-by-case basis where advocacy agendas align (including the Alliance for Gambling Reform and the Victorian Local Governance Association's Local Government Working Group on Gambling).
	We would also recommend that council undertake more advocacy around the EGM venue application process.	
	The Alliance for Gambling Reform has great resources relating to these areas of reform. Council should join the Alliance to ensure that its advocacy aligns with other councils and strengthen the calls for change through strategic planning and information sharing.	
	I encourage Council to join the Victorian Local Governance Association's Local Government Working Group on Gambling.	Council will continue to actively support reform efforts, having already contributed to joint advocacy with other Victorian councils to strengthen regulation and support recommendations for mandatory cashless pre-commitment cards. Council will consider any and all impactful advocacy items as part of the Policy. To make this more explicit, an amendment to the policy actions has been made to include “advocate to State/Federal Government on the following, but not limited to” to reflect Council's intent to proactively seek further advocacy opportunities than those listed.
	Require them [EGM venues] to issue prepaid gambling cards that can be viewed by gambling control government agency	
	Similarly, council must continue to advocate for a reduction in opening hours of gaming venues further to the current state government reforms and push for more reforms of the industry including maximum \$1 bets, removing losses disguised as wins.	
	While I am glad to see the City of Casey prioritise advocacy, I am concerned by the limited items it plans to advocate for. The advocacy items at the state level focus on increasing transparency and oversight in relation to the Community Support Fund and community contributions. I would also like to see advocacy surrounding structural and environmental changes that would reduce the risks associated with EGMs. This includes reducing maximum bets to \$1 which was recommended by the Productivity Commission in 2010, and changing the legislation that enables venues to be open 20-hours per day.	

	The advocacy section is one of the most important sections to influence state government policy specific to the City of Casey and as such could be more strong by advocating for better planning and licensing regulations. For example, I believe gaming venue applications in the Urban Growth Zones do not require councils to undertake community consultation for planning permits applications. This is a massive flaw in the system that Casey experienced in 2020 when there was an application for a gaming venue in Clyde. The Urban Growth Zone presents a vulnerability for the City of Casey however addressing the lack of it's inclusion in the regional caps will help reduce that risk so I am pleased advocacy around the regional caps are included in the policy. That itself, however is not enough. More analysis from the land use planning side is required to determine where there are gaps in the local planning scheme and relevant policies.	
	In a municipality like Casey the VGCCC will only take into consideration the primary impact of a gaming venue application on a radius of 2.5km and 5km around the proposed venue. In a municipality like Casey this radius is not sufficient enough to adequately address the impact especially when convenience gambling can be an issue.	
	A key method of preventing harm in Casey will require for a reduction of EGMs in the municipality which will require intervention by the State Government to take back relinquished EGM entitlements and council should advocate for this to happen.	
	Similarly, I would encourage Council to push the Federal government for a complete ban of all gambling advertisements in all media sources - print, electronic, broadcast, etc. Whilst 'having a punt' can be a bit of fun with mates, it should not be actively encouraged, especially by a multi-billion dollar industry whose only goal is to suck dry as many people as they can get their hands on.	The Policy includes advocating to Federal Government that a national strategy be established with greater regulation of online gambling and associated advertising as recommended in the <i>You Win Some, You Lose More</i> report, resulting from the 'Inquiry into online gambling harm and its impact on those experiencing gambling harm' (June 2023).
Leadership	As mentioned above, a comprehensive public health approach requires independence from the gambling industry. While the policy includes some	

	statements that, if implemented, would distance Council from EGM venues and those that accept funding from EGM venues, the language within this section of the policy is weak. It doesn't appear to be a genuine commitment to change. Instead, the policy relies on soft language such as "not support", "endeavour to transition", and "discourage". I am concerned that this soft language signals that Council is not truly committed to following through with these changes. This language should be strengthened to demonstrate Council's commitment.	In consultation with internal stakeholders, impactful and achievable actions have been developed. Council has taken a significant step forward in embedding a whole-of-organisation public health approach to gambling harm. Over the life of the Policy, Council will continue to evolve this approach.
	I applaud council's policy commitments in the leadership section of the policy, however feel this could be significantly strengthened. ANZAC Day events should be the only exception to holding events in gaming venues however, with the understanding that veterans are vulnerable to gambling harm. Employment related events should not be held at gaming venues under any circumstances or any other events that are targeted at vulnerable groups of people who could be at higher risk of harm.	
	Council should also commit to transiting away from hold Council events, activities and programs in EGM venues (not simply endeavour to transition). This point should also extend to events that are not hosted by Council. The policy should include the commitment that Councillors (when they return) and Council staff will not attend gambling venues when representing Council in an official capacity – the only exception being ANZAC Day events. Council should also commit to not renewing any of the current agreements (e.g. those with Amstel) after the current agreement ends. Continuing these agreements threatens Council's independence from the industry – a key element of the public health approach. With the facilities at Bunjil Place, there is no genuine need for Council to host events at gambling venues.	
	For Leadership, I feel that Council can again do more to push back against gambling, and extend 5.2.3 (b) to include organisations with known links with the gambling industry (i.e. indirect funding), to clearly establish Council's view that gambling - especially the organised syndicates and cartels of today - is not accepted in the community	Council has developed impactful and achievable policy mechanisms to sever links with the gambling industry. Whilst it is recognised that indirect links and associations are important, Council's focus is direct links and funding.

	In addition to the areas mentioned above that require advocacy, there are several things Council could do within its current jurisdiction. Council should update its Leasing and Licensing Policy to not permit gambling promotion or advertising on Council-owned land, including sports betting, online gambling and EGM.	Council recognises the added impact the suggested action would have and has amended the policy to include action item: Upon review of Council's Leasing and Pricing policy, include that all gambling promotion or advertising on Council-owned or managed land will not be permitted.
	I question what it means to 'not support EGM-operating venues on council-owned land.' Does this mean that council will not renew leases with such venues? Does it mean that council will support organisations that operate venues on council land but not the venues itself? Will council consider a differential rates system for these venues even if they are a club and charge them at a commercial rate or a rate of their own?	An amendment to the policy has been made that Council will 'Council will not support any new EGM-operating venues or organisations on Council-owned or managed land and will not renew existing EGM-operating venues or organisation leases on Council-owned or managed land' with the footnote that excludes any existing lease agreements.
	Regarding point (d) – Other Councils (e.g. Darebin) have adopted a stronger approach to Council grants which I support. This includes that Council community grants are not made available to sporting clubs, community groups, organisations, associations or businesses that (1) own or operate EGMs, (2) receive sponsorship or grants from EGM revenue, or (3) meet in venues that have EGMs. Council could also use its leases and licenses to encourage sporting/community organisations to not accept sponsorship or donations from gambling venues or other gambling companies.	In consultation with internal stakeholders on the impact to community groups/sporting clubs, the possibility of unintended negative consequences were of primary importance. Council will give further consideration to the issue over the life of Policy to ensure any changes do not adversely impact community organisations.
	Regarding point (f) - What does Council consider is "gambling advertising"? Will this include logos for gambling venues? I have been working on a research project which shows that sporting organisations view venues that include restaurants/bistros alongside gambling products as hospitality venues rather than gambling venues. Council should be clear that gambling venues cannot be marketed on Council land or facilities.	The reference to all forms of gambling advertisements are inclusive of any advertisements from the gambling industry and/or gaming venues. These will be included in seasonal tenancy agreements.

	Council can also use its leases and licenses to encourage sporting clubs to not take sponsorships and donations from gaming venues, or in the least encourage better culture around signage through the seasonal tenancy agreements, and the Advertising Signage on Council's Active Recreation Reserves Policy.	Further consideration will be given to the approach through the life of the policy.
	Council should also extend this commitment to the community event signage advertising policy for signage on council land. If council is wanting to take a strong stance against gambling, especially around online gambling, then no advertising on council land and reserves should include advertising for online gambling companies such as Ladbrokes ie. The Cranbourne Racecourse promoting their events on council reserves and including the Ladbrokes logo. If council is advocating for the federal government to have better regulation around online gaming companies, then council should also consider using the levers it has to regulate such advertising on its own land!	Council's Advertising and Promotional Signage on Council Active Recreation Reserves Policy includes that signage must not contain direct gambling product advertisement. Cranbourne Racecourse is on Crown Land, however, policy owners have been notified to review signage on any Council reserves.
	Support for Community Organisations: Avoid penalising community organisations receiving funding from EGM venues. Provide clear definitions for terms like "Gambling Advertisements" to prevent unintended consequences and support alternative funding mechanisms.	Council's policy does not prevent any community organisation from receiving support from any venue. However, Council's intent is to demonstrate independence from the gambling industry and associated activities, implementing policy where organisations do receive support from the gambling industry/venues.
Community Development & Engagement	Partnership with VGCCC: Partner with the VGCCC to leverage their expertise and resources. Focus on localised, targeted initiatives to raise awareness and provide support services.	As outlined in 5.2.1(c) Council will seek partnership and collaboration with other Councils, community, research bodies, and expert organisations – this is inclusive of any opportunities to work with the Victorian Gambling and Casino Control Commission as the peak regulatory body of all gambling in Victoria.

Research & Data	Objective, Evidence-Based Policy: Emphasise the importance of seeking diverse, credible research sources and avoiding confirmation bias. Regularly update policies based on the latest data and maintain transparency in reporting and decision-making.	Through its annual updates (5.2.5(a)) Council will apply transparency by disclosing any research partnerships that have/are taking place. Any updates to the policy will be published and a full review scheduled 4 years from endorsement.
General	While it is great to see the inclusion of a public health approach, the policy appears to adopt a weak/watered-down version. A public health approach prioritises harm prevention, it does not simply seek to minimise it.	Council has taken a significant step forward in embedding a public health approach to gambling harm and over the life of the policy as adjustments and transitions are made in practice, both internally and for community organisations, Council will revisit its policy position.
	It's an all too common problem now and sadly there are a number of venues around the City of Casey area that contributes in more ways than one, to the gambling problems.	The policy's scope and its primary focus is through Council's greatest area of influence with gambling at EGM venues, having a legislated role in the planning process. Its secondary focus is addressing the increasing risks of harm experienced in the community as a result of growth in online gambling, sports betting, and the ongoing investments by the gambling industry.
	I would like to give support for more gambling in the city of Casey, people who gamble are not committing a crime, they simply are enjoying themselves and with all the anti-gambling, it seems as if the people behind it want to take away peoples enjoyment and fun. Many people go to the pokies for socializing and it's their only entertainment outing. So ease up and look at how silly this anti-gambling movement has become and many rate payers seriously don't like our council rates being spent on silly things like this. Relax and pop 10 bucks in the machine and you never know, you may win. Let people enjoy themselves stop interfering in peoples lives, this nannysium is a sickness.	The policy position is to focus on minimising gambling harm experienced within the community as opposed to restrictions on gambling as an activity. Council's position is that whilst gambling is a legal and regulated activity, Council recognises the significant harms and risks to health and wellbeing that result directly and indirectly from gambling activities within the municipality.

		As with many other councils, Casey Council views gambling harm as a significant public health issue requiring action.
	The Casey Ratepayers and Residents Association broadly supports council's gambling harm minimisation policy. The CRRA has sent submissions to the regulator for EGM venue applications in the City of Casey previously, and is pleased to see council taking a strong stance against gambling harm. If possible, we would like council to take a stronger stance.	Council will continue to revisit its position throughout the life of the Policy.
	I commend officers for a well thought out, comprehensive gambling harm minimisation policy and for taking a strong stance on gambling. Council has taken a strong stance on gambling harm, however the stance could be made stronger by attempting to prevent harm as per a public health approach, instead of trying to minimise it.	
	I would like to begin by acknowledging the strengths of this policy. I was pleasantly surprised when reading the policy as it is a significant improvement to the previous policy. Particular strengths include: * The inclusion of a public health perspective. Including shifting from a focus on 'problem' gambling to gambling harm and recognising that harm is experienced by more than just people who engage in high-risk gambling behaviours. * The policy reflects some of the social, environmental, and commercial determinants of harm rather than focusing on individual factors. * The focus on a whole-of-council approach. * Committing to not distribute gambling derived profits through a community contribution program.	
	Purpose and Intent (Section 1): o Balanced View on Gambling: Recognise that not all gambling activities cause harm. Policies should target gambling spending per capita and irresponsible gambling service providers rather than imposing broad restrictions that affect all	As stated in the policy, Council recognises "gambling is a legal and regulated activity". Policies certainly have regard for per capita EGM losses (not solely total LGA losses) which is why the data was included in the policy. When looking at sub-municipal per capita losses, there are areas of the

	gamblers. Recreational gambling is a legitimate form of discretionary spending for many and should be respected as such.	City of Casey that experience significant losses per capita. For example, Cranbourne is mentioned in the policy as having a significant cluster of venues and associated per capita losses. Both total and per capital data (at different geographic scales) are relevant when reviewing EGM losses.
	Scope (Section 2): o Inclusive Policy Scope: Expand the policy to address all forms of gambling, including sports betting outlets, lottery agencies, and other non-EGM venues. Omitting these forms suggests a biased approach and undermines the comprehensiveness of the harm minimisation strategy.	The policy states that online gambling (including sports and race betting) is of "growing concern" and advocacy will include an online gambling reform agenda to the Federal Government.
	Background and Gambling in Australia (Section 4.1): o Contextualising Gambling Harm: Present a balanced view by contextualising the data on gambling harm. Only a small proportion of gamblers experience significant harm, and policies should reflect this nuance.	A public health approach looks at the broader harms that result from gambling activities, not focussed only on the individual 'problem gambler'. The latter is a narrow focus that ignores broader social harms.
	Policy and Reform Agenda (Section 4.3): o Acknowledging Recent Reforms: Recognise the recent gambling reforms and their potential impact. Align policies with the VGCCC's balanced stance, targeting unscrupulous operators from all forms of gambling rather than all EGM venues.	The policy acknowledges recent reforms in section 4.3
	Electronic Gaming Machines (EGMs) in Casey (Section 4.4): o Use of Recent Data: Reflect the significant drop in EGM expenditure in the most recent data. Highlight the decline in per capita EGM expenditure as a success and use it as a benchmark for future assessments.	VGCCC data suggests total expenditure on EGM venues in the City of Casey in 2023/24 will be similar to 2022/23. Per capita losses data are included in the policy and when excluding closures for COVID-19, trends suggest that per capita losses have remained relatively stable over the previous decade.
	Other Forms of Gambling in Casey (Section 4.5): o Regulating All Forms of Gambling: Address the Council's influence over various gambling activities,	Council recognises its role in minimising gambling harm through all forms and will support this through advocacy, research and data, community

	including online gambling, to ensure a comprehensive approach to harm minimisation.	engagement, and leadership efforts. It recognises its greatest influence is on gambling from EGMs with its legislated role within the planning process and through the Casey Planning Scheme.
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