

30 June 2014

Gambling Policy and Litigation Group
Department of Treasury and Finance
1 Treasury Place
EAST MELBOURNE VIC 3002

Ask for: Natalie Walker
Phone: 9932 1096
Our Ref: A1950376

Dear Gambling Policy and Litigation Group,

REVIEW OF THE GAMING MACHINE ENTITLEMENT TERM ISSUES PAPER

I am writing in response to the review of the terms for Gaming Machine (EGM) entitlements in Victoria.

Having read the issues paper and the rationale for extending the terms of EGM entitlements, it is acknowledged that the extension of terms may provide greater certainty for those businesses involved in the gaming sector.

In saying this however, Hobsons Bay City Council is concerned that the primary focus of the issues paper is on the financial viability of clubs and hotels with EGMs. Whilst recognising that gambling on EGMs is a legal activity in Victoria, the issues paper should also consider the potential social and economic impacts on EGM users and the broader community, if entitlements were to be extended from the current 10 year term to 15 or 20 years.

Currently, local government and other stakeholders have limited opportunities to raise concerns about where EGM licences are located and their management. If the terms were to increase, it may further limit the ability to do this, reducing the identification and mitigation of negative community impacts. It is therefore suggested that if the terms of entitlement are extended, a review period at year 10 is introduced which includes a social impact assessment and the opportunity for stakeholder input before a licence is automatically extended.

Lastly, it is suggested that this review be broadened to ensure a wider range of views are considered. Currently, the issues paper is primarily aimed at venues and the gambling sector. In order to better understand the potential implications if entitlement terms are altered, the timelines for this review should be extended and the review should seek expert advice from relevant academics and service providers, including an analysis of the impact on other states which have unlimited and long terms of entitlements.

Problem gambling is a key issue for Hobsons Bay City Council and our community. It is therefore critical to ensure that the review of entitlements supports responsible gambling behaviours. I look forward to seeing the outcomes of the review.

If you would like to discuss the matter further please contact Natalie Walker, Director Strategic Development on 9932 1096 or email nwalker@hobsonsbay.vic.gov.au .

Yours sincerely,

Chris Eddy
CHIEF EXECUTIVE OFFICER