



The Administration Advisor,
Tasman District Council,
Private bag 4,
Richmond 7050.

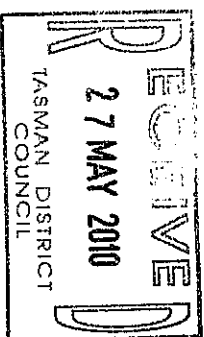
264
Trafalgar Park
Nelson
PO Box 593
P 03 548 2204
F 03 548 2204
26|5|10

Dear Sir/Madam
Please find attached a submission from the Nelson Cricket Assn on the review of gambling venues policy.

I would also like to speak on this submission when the TDC meet to discuss. My contact numbers are 5482204(work) or cellphone 0274314093.

Yours faithfully.

Gordon Davidson
(Executive Officer)



Submission to Tasman District Council.

Ref review of the gambling venues policy.

By Gordon Davidson Executive Officer Nelson Cricket Assn.,

I would like to take this opportunity in outlining our reason for putting forward a submission against your proposed amendment.

I would also like to speak to the Council on the submission.

Nelson cricket would not survive or have over 2700 people playing the game if we did not get funding help from the gaming machine trusts. I would also add that our parent body NZC would also struggle to supply the funding to Districts like Nelson in which there are 28 Cricket Districts within NZ if this policy was adopted New Zealand wide.

The ever growing user pays policy of schools and sports have put severe financial pressure on parents and by gaining funding from gaming machines the Board of Nelson Cricket has a policy of not having any child unable to attend tournaments or play the game because of the financial restraints. The gaming machine funding helps us meet the short fall of trips and accommodation of all our teams and keeps the costs down to our members.

In other words we as a sport are able to grow our game at all levels and also run comprehensive cricket programs at all schools within the region thanks to gaming machine funding.

We receive funding from 6 gaming machine trusts and we need their valued support to continue to run our sport and also to contribute to buildings at Saxton Oval and meet our share of the costs for the grounds and wickets we use within the Nelson / TDC region.

I would also like to add that if the policy amendment goes through then the decline of sports as we know it in the region would be a direct result of this amendment.

Please reconsider this amendment and change accordingly for the sake of cricket and all sports within your region.

Please find below a break down of income from Gaming machines and our expenditure from 2007 financial year to February 2011.

You will see why we are so reliant on gaming machine funding to survive.

| Year | Gaming Mach. income | rep teams travel and accommodation | TDC and NCC charges. |
|--------------------------|---------------------|------------------------------------|----------------------|
| 2007 | 68822.00 | 58004.00 | 21783.00 |
| 2008 | 54260.00 | 70184.00 | 26792.00 |
| 2009 | 61247.00 | 61296.00 | 27731.00 |
| 2009/10 (To Feb only) | 65058.00 | 61576.00 | 32731.00 |

Valerie Gribble

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From: Apache [apache@tsrvweb.dnz.tdc.govt.nz]
Sent: Friday, 4 June 2010 9:59 p.m.
To: Valerie Gribble
Subject: TDC Form submission > Submission Form

Name: Paul Searancke

Address: 18 Sunrise Valley Road
Upper Moutere

Telephone Contact Number: 5432213

Email Address (optional):

Are_you_submitting_as_an_individual_or_on_behalf_of_an_organisation?: Individual

If_an_organisation,please_name_the_organisation:

Your_comment: Any decrease in the "pokies will have a detrimental effect on the availability of funding for non"sports"groups. Most grants from charities and larger organisations are targeted towards the "Arts"
Any significant shortfalls will either see a decrease in activity or an expected increase in funding from council.

Please_note: All_written_submissions_will_be_made_available_to_councillors_and_the_public_would_you_like_to_voice_your_submission_at_a_council_meeting_held_for_this_purpose?: Yes

where_would_you_like_your_submission_to_be_heard?: Richmond

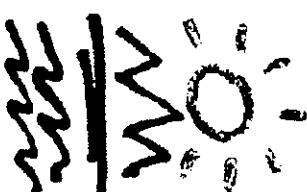
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Golden Bay Community Board

C/- Tasman District Council
Golden Bay Service Centre
78 Commercial Street
P.O. Box 74
Takaka 7172
Phone 03 525 0020

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11 June 2010

Administration Advisor

Tasman District Council

Private Bag 4

Richmond

Golden Bay Community Board Submission to Tasman District Council Draft Gambling Venue Policy.

Introduction

It is recognized that gaming machines are very much a double edged sword. On one hand they are a source of funds for community organizations, on the other, their use can lead to serious problem-gambling issues which impact on individuals, families, organizations, businesses and the wider community.

Specific Submissions

1) New Machines

That no more machines that presently exist in TDC licensed premises be permitted.

2) Existing Gaming Machines.

That licenses for machines at existing venues cannot be transferred to other premises and, when licenses lapse, they are cancelled.

3) Host Responsibility.

That operators of venues with gaming machines be required to monitor users and mitigate problem gambling in a similar way to that required to monitor alcohol consumption.

In the event of a Hearing of submissions we **DO** wish to be heard.

Yours sincerely,

Joe Bell Chairperson Golden Bay Community Board





HARKNESS HENRY
LAWYERS

267

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1 June 2010

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Tasman District Council

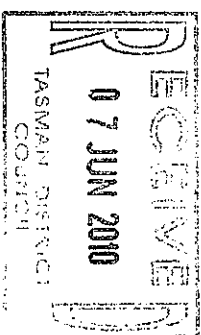
Please refer to: Jarrod True
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Private Bag 4

Richmond

NELSON 7050

Attention: The Administration Advisor



Tasman District Council Gambling Venue Policy Review

We enclose New Zealand Racing Board's submission on the Tasman District Council's Gambling Venue Policy. We wish to speak in support of our submission via teleconference (if possible).

HARKNESS HENRY

Per:

JARROD TRUE
Partner

encl.

**The New Zealand Racing Board's Submission on the Tasman District Council's
Current Single Gambling Venue Policy**

Background

1. The New Zealand Racing Board is a statutory body operating under the Racing Act 2003. The New Zealand Racing Board is the authority responsible for administering racing, racing betting and the racing judicial system in New Zealand and is the only entity which can legally conduct racing betting in New Zealand. The New Zealand Racing Board has approximately 100 stand alone TAB Agencies ("Board Venues") in New Zealand. The Board Venues are owned or leased by the New Zealand Racing Board and controlled and run by the New Zealand Racing Board.

2. The New Zealand Racing Board has 1 Pub TAB and 1 self service terminal in the Tasman District as follows:

| Name | Address | Type of Outlet |
|-------------------|------------------------------|-----------------------|
| Post Office Hotel | 122 High Street, Motueka | Pub TAB |
| Junction Hotel | 15 Commercial Street, Takaka | Self service terminal |

3. The Tasman District currently has no TAB Board Venues, i.e. stand alone TABs. Council only has jurisdiction over Board Venues, i.e. stand alone TABs. Council consent is not required under the legislation to establish a TAB facility in a bar, hotel or club.

The Racing Industry

4. The New Zealand Racing Board via its TAB operation funds and promotes racing in New Zealand. Racing in New Zealand:
 - a. Generates 1.3% of New Zealand's GDP - around \$1.5 billion per year;
 - b. Creates 18,300 full time jobs, generating more than \$679 million in salaries and wages;



- c. Generates more than \$130 million in export sales of horses; and
- d. Holds more than 780 race meetings a year, attended by more than 1.04 million people.

Executive Summary

- 5. The New Zealand Racing Board invites Council to:
 - a. Separate the Board Venue (TAB) policy and class 4 venue (gaming machine) policy and have the review and consultation of the two policies done at different times. The combined consultation results in a discussion dominated by the harm caused by gaming machines without due consideration being given to TAB Board Venues.
 - b. Streamline the application process by removing the public consultation requirement for every new application.
 - c. Maintain the status quo uncapped policy. A cap or sinking lid will not reduce problem gambling but will reduce community funding opportunities.

Separation of TAB Board Venue Policy from Class 4 Gambling Venue Policy

- 6. Council currently has one policy which covers both TAB Board Venues and class 4 gambling.
- 7. Councils are required to adopt two separate policies, a TAB Board Venue policy under s 65D of the Racing Act 2003 and a class 4 gambling venue policy under s 101 of the Gambling Act 2003.
- 8. The following Councils have separate class 4 and TAB Board Venue policies:
 - Chatham Islands Council
 - Gore District Council

- Hamilton City Council
- Hastings District Council
- Hurunui District Council
- Nelson City Council
- Opotiki District Council
- Rangitikei District Council
- Southland District Council
- Upper Hutt City Council
- Waimakariri District Council
- Waipa District Council

9. Over the last six months the New Zealand Racing Board has during the consultation process requested that Councils separate their policies. Almost all Councils spoken to to date have indicated that they will separate the policies. Recently the Southland District Council, Chatham Islands Council, Gore District Council, Hurunui District Council, Nelson City Council, Southland District Council and Upper Hutt City Council amended their policy and formally separated the TAB and class 4 policies. The Hurunui District Council in their letter of 28 September 2009 stated:

"The Council agreed to adopt two gambling venue policies; one for TAB venues and another for Class 4 venues. It was agreed that these venue types are very different and that this will enable the merits of restrictions on either type of gambling to be debated separately, should it arise in the future."

10. By incorporating both policies in one combined document and having a single public consultation the discussion and submissions focus on the harm caused by gaming machines without due consideration being given to TAB Board Venues. The writer has attended almost all the gambling venue public consultation hearings held by the various Councils in New Zealand over the last five years and found that the process was dominated entirely by criticism in respect of gaming machines without any consideration being given to the separate issue of TAB Board Venues. Despite thousands of submissions being made to local Councils over the last four years, only a handful of submissions have suggested that TAB Board Venues be restricted.

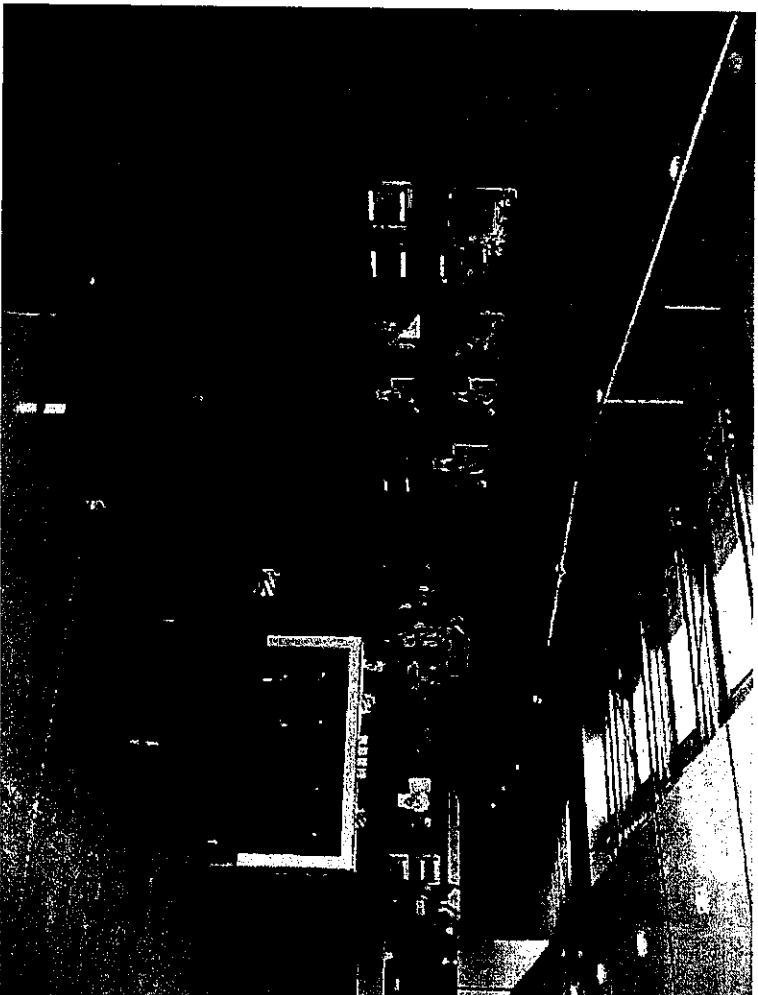
11. Board Venues are different from class 4 venues. Race and sports betting are different from the rapid and repetitive gambling undertaken on a gaming machine. Race and sports betting does not have a high prevalence of problem gambling. Only

- 5% of all problem gamblers indicate a problem with race betting. Only 1% of all problem gamblers report a problem with sports betting.
12. Board Venues are operated by the New Zealand Racing Board, a statutory body. Board Venues are highly supervised, have highly trained staff and are subject to regular internal audits.
 13. The only possible concern about formally separating the two policies is the possibility of Council incurring additional administration costs. However, having two policy documents rather than one is unlikely to incur any additional cost but would provide greater clarity.
 14. It is suggested that the class 4 venue policy be reviewed in three years but the Board Venue policy be reviewed in two years and simply rolled over if there is no need for change. Given the lack of any negative feedback in respect of TABs a roll over of the policy would be appropriate. Further, any formal separate TAB review is likely to only attract 2 or 3 public submitters and be able to be dispensed with within one hour.

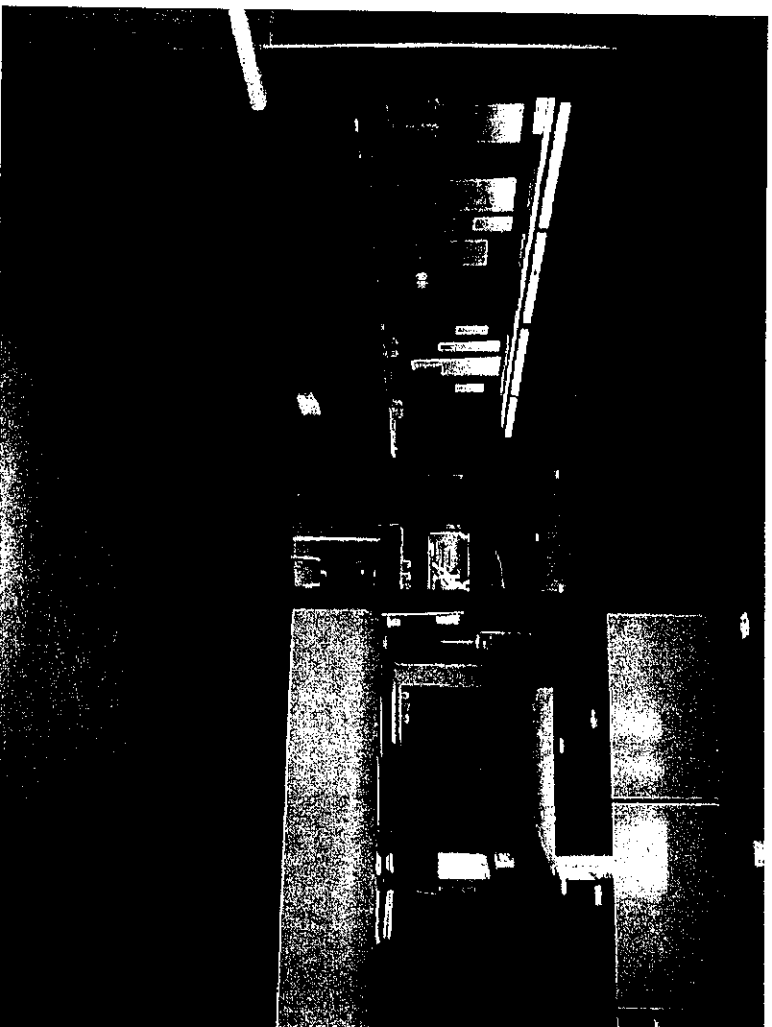
Board Venue Regulations

15. Board Venues are controlled by the Racing (Harm Prevention and Minimisation) Regulations 2004. The Regulations ensure that Board Venues provide a safe environment to gamble and that staff at the Board Venues are well trained. The Regulations:
 - a. Prohibit automatic teller machines at Board Venues;
 - b. Require signage to be displayed in all Board Venues which encourages players to gamble only at levels they can afford and advice on how to seek assistance for problem gambling;

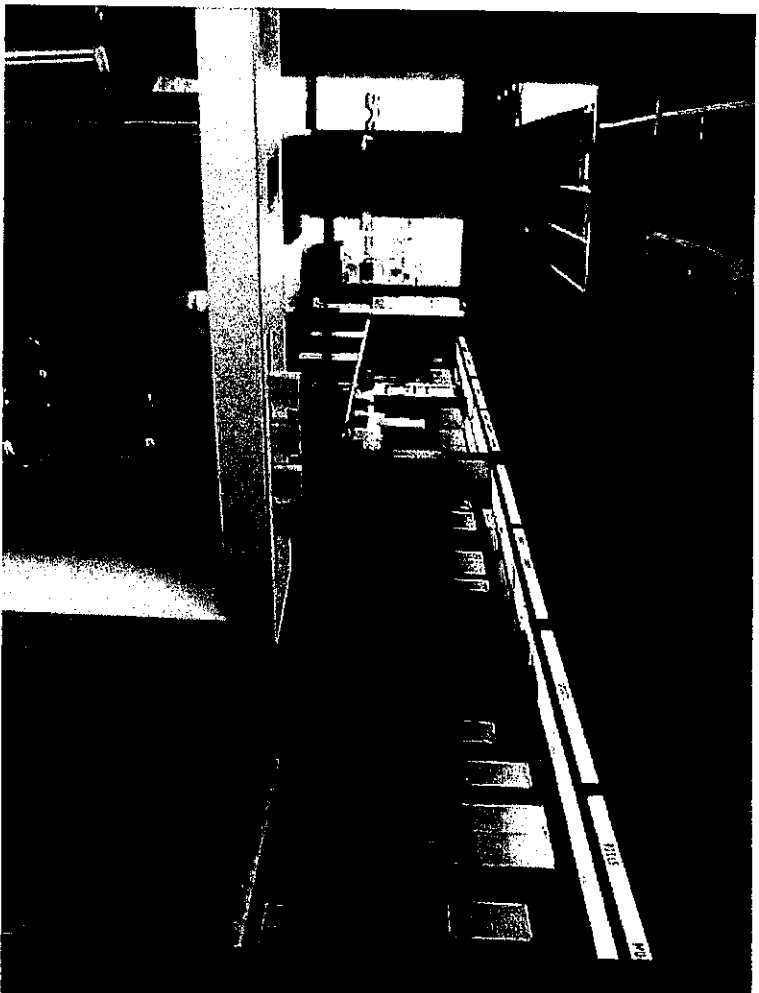
- c. Require all staff to have undertaken problem gambling awareness training. The training undertaken by staff includes information on how to:
 - i. Approach a player that the employee has reasonable grounds to believe may be experiencing difficulties related to gambling;
 - ii. Provide information to a player about the characteristics of problem gambling (including recognised signs of problem gambling);
 - iii. Provide information to a player about the potential risks and consequences of problem gambling;
 - iv. Provide information to a player about how to access problem gambling services; and
 - v. Remind a player that the Board may refuse to accept a bet without giving any reason for doing so.
16. All Board Venues have a self-exclusion procedure where customers can elect to exclude themselves from any form of gambling at the venue.
17. The New Zealand Racing Board provides problem gambling awareness training to each employee and agent who is involved in supervising gambling. The training module was prepared by experts in the problem gambling field and is comprehensive.
18. All Board Venues are connected via closed circuit television to a central monitoring office. This is one method of ensuring persons under 18 years of age are not permitted to gamble. Board Venues are also subject to regular audits and spot checks to ensure adherence to the legislative and regulatory requirements along with the New Zealand Racing Board's own problem gambling policy requirements.
19. The New Zealand Racing Board is a participant in the Problem Gambling Data Advisory Group organised by the Ministry of Health.
20. The Board Venues in New Zealand are being remodelled. The photos show the clean, modern look of the new Board Venues.



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TAB



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TAB

Class 4 Venue Policy - Gaming Machines - Key Facts

21. Gaming machines have been operating legally in pubs and clubs in New Zealand for over 22 years.¹
22. Approximately 90% of New Zealanders over the age of 18 years participate in one form of gambling activity on a regular basis.²
23. Recent research suggests that, at any given time, between 0.3% and 1.8% of adults living in the community in New Zealand are likely to score as "problem gamblers" on standard questionnaires. This conclusion is largely derived from three large surveys, using different questionnaires, over a period of eight years. The most recent of these surveys returned the lowest estimate (0.3% to 0.5%)³
24. Since 2005, gaming machine expenditure has been reducing.⁴ The largest increase in spending was on Lotteries Commission products, due mainly to the introduction of Big Wednesday. Overall expenditure on gambling in 2008/2009 was made up of:

¹ Gaming and Lotteries Act 1977 and Gambling Act 2003.

² 2005 Participation and Attitudes Survey (Department of Internal Affairs, 2008), 2006/2007 Gaming and Betting Activities Survey (Health Sponsorship Council and National Research Bureau Ltd, 2007).

³ For example:

- The 1999 *National Prevalence Survey* (M.W. Abbott and R.A. Volberg, (2000), *Taking the Pulse on Gambling and Problem Gambling in New Zealand: A Report on Phase One of the 1999 National Prevalence Survey*, Wellington, Department of Internal Affairs) estimated that 0.3% to 0.7% of adults living in the community were current probable pathological gamblers and a further 0.6% to 1.1% were current problem gamblers. "Adults" meant those aged 18 and over. "Current" meant within six months of being surveyed. "Probable pathological" meant a SOGS-R score of 5 or more. "Problem" meant a SOGS-R score of 3 or 4.
 - The 2002/03 *New Zealand Health Survey* [Ministry of Health (2006), *Problem Gambling in New Zealand: Analysis of the 2002/03 New Zealand Health Survey*, Wellington, Ministry of Health] estimated that 1.0% to 1.5% of adults living in the community were current problem gamblers. "Adults" meant those aged 15 and over. "Current" meant within 12 months of being surveyed. "Problem" meant a positive response to either of the two items in the Let/Bed screen, or a positive response to one or more nominated items from a screen developed for the Survey, using questions from other validated screens.
 - The 2006/07 *New Zealand Health Survey* [Ministry of Health, (2008), *A Portrait of Health: Key Results of the 2006/07 New Zealand Health Survey*, Wellington, Ministry of Health] estimated that 0.3% to 0.5% of adults living in the community were current problem gamblers. "Adults" meant those aged 15 and over. "Current" meant within 12 months of being surveyed. "Problem" meant meeting the criteria in the 9 question PGSI from the CPGI. (It is worth noting that the CPGI tends to be more conservative than the SIGS-R). A further 1.1% to 1.5% of adults were "moderate risk" gamblers, and 3.1% to 3.9% were "low risk".
- All three Surveys were large (6,452, 12,949 and 12,488 respondents respectively) and had high response rates (75%, 72%, 68%). The 1999 Survey was a telephone survey, the two Health Surveys were face-to-face.
- ⁴ Problem Gambling Intervention Services in New Zealand: 2007 Service-user statistics (Ministry of Health, 2008)

| Gambling Product | 2008/09 Expenditure (\$m) | Increase / Decrease since 2007/08 |
|-------------------------------|---------------------------|-----------------------------------|
| Racing and Sports Betting | 269 | -1.2% |
| Lotteries Commission Products | 404 | +16.7% |
| Non-Casino gaming machines | 889 | -5.3% |
| Casinos | 465 | -2.4% |
| Total | 2027 | -0.3% |

25. The Department of Internal Affairs has reported a reduction in community grants of \$36,000,000.00 in 2008 due to a reduction in gaming machine revenue.⁵ Community organisations have suffered considerably as a result of decreased gaming machine expenditure and the corresponding funding decline.

26. All gaming machine societies contribute to a problem gambling fund. This fund provides approximately \$20,000,000.00 to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The programme is working as is evident by the considerable reduction in the number of people seeking help from the national gambling helpline and intervention services. In fact some concern has been raised by the media about the amount of funding which is being received per individual problem gambler. For example, concern was raised by the New Zealand Herald that Hamilton's Pacific People's Addiction Service received \$143,160.00 to provide counselling for a target of 306 people – but it attracted only eight users at an average of \$17,895.00 per gambler.⁶

New Gaming Machine Regulations

27. Class 4 gambling is highly regulated, regulation which is described by the Department of Internal Affairs as world leading. Since the current policy was first introduced the following new regulatory safeguards have been imposed:

- a. The Gambling (Harm Prevention and Minimisation) Regulations 2004;
- b. The Gambling (Infringement Notices) Regulations 2004;

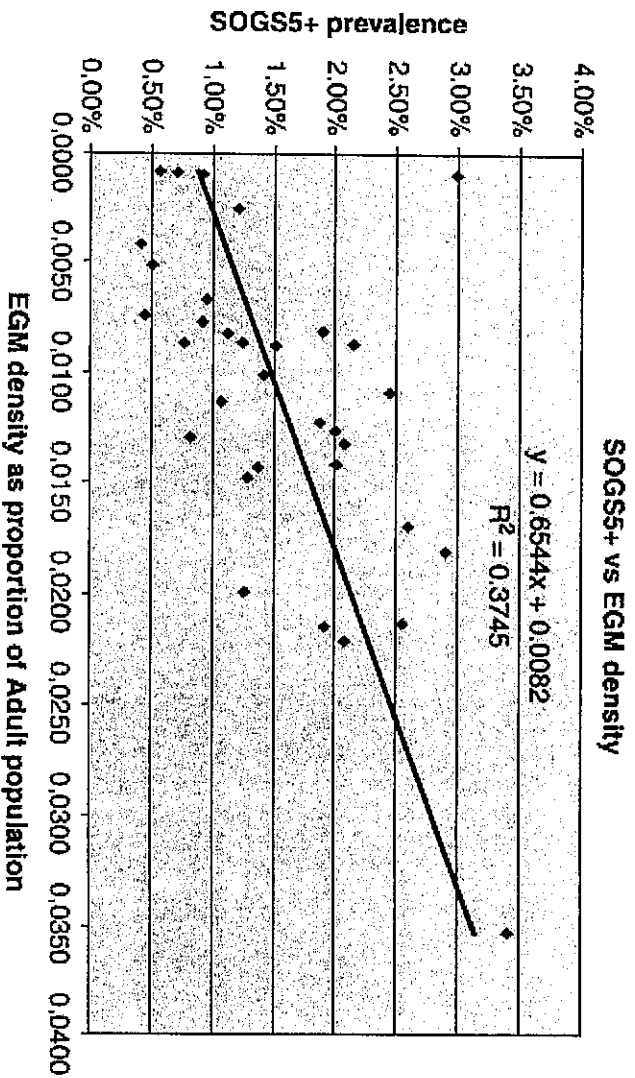
⁵ Gambling expenditure statistics table for 1984-2008 - www.dia.govt.nz
⁶ New Zealand Herald 19 April 2007.

- c. The Gambling (Fees and Revocations) Regulations 2004;
 - d. The Gambling (Class 4 Net Proceeds) Regulations 2004;
 - e. The Gambling (Class 4 Bankings) Regulations 2006;
 - f. The Gambling (Electronic Monitoring Fees) Regulations 2006; and
 - g. The Gambling (Problem Gambling Levy) Regulations 2007.
28. The regulations are comprehensive and include the following:
- a. A list of unsuitable and prohibited venues, e.g. sports stadiums, internet cafes, and cinemas. The Regulations provide that the primary activity of the venue must be focused on persons over 18 years of age. The types of venues permitted are accordingly limited to licensed premises, clubs, TAB agencies and massage parlours etc;
 - b. Limits on stake and prize money. 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. These limits only apply to gaming machines in pubs and clubs. Gaming machines at casinos do not have these restrictions and offer considerably larger stakes and prizes. It is also not illegal in New Zealand to participate in internet gambling. Internet gambling stakes and prizes are unrestricted;
 - c. A requirement that gaming machines 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. The message is then displayed asking the player whether they wish to continue with their session or collect the credits;
 - d. A prohibition on the use of the word "jackpot" or any similar word in advertising and a prohibition on advertising being visible from outside a venue;

- e. A requirement that pamphlets must be at the venue which provide information on odds and also information about the characteristics of problem gambling and how to seek advice for problem gambling;
 - f. A requirement that signage be displayed in venues which encourages players to gamble only at levels they can afford and advice on how to seek assistance for problem gambling;
 - g. A requirement that one staff member must be present at all times who has undertaken comprehensive problem gambling awareness and intervention training;
 - h. A requirement that a minimum of 37.12% of gaming machine proceeds are distributed to the community each year.
29. Other restrictions have also been imposed since the current policy was first introduced including:
- a. In September 2004 the DIA set limits on the amount of venue payments that may be paid to gaming machine venues under s 116 of the Act. The limits ensure that costs are kept to a minimum and thus the proceeds available to the community are maximised;
 - b. In June 2006 a new set of comprehensive Game Rules were established by the DIA pursuant to s 367 of the Act. The Game Rules set out in detail how gaming machines must be operated and how issues such as player disputes and machine malfunctions must be dealt with; and
 - c. All gaming machine venues must be connected to an electronic monitoring system. The electronic monitoring system ensures greater accountability of gaming machine turnover.

No Need to Change the Status Quo – A Restrictive Cap or Sinking Lid Policy Will Not Reduce Problem Gambling

30. It is anticipated that Council will receive submissions urging it to adopt a sinking lid policy, or introduce a cap. A sinking lid policy is the most restrictive approach that Council could adopt. It is submitted that such an approach is unjustified in the current environment of high regulation and naturally reducing machine numbers. There is no reason to change the present policy.
31. The number of gaming machines in New Zealand has been in steady decline since 2003. In 2003 New Zealand has 25,221 gaming machines. In December 2009 New Zealand had 19,359 gaming machines. The Tasman District has also experienced a natural decline in machine numbers. In 2003 the Tasman District had 23 class 4 venues and 233 machines. The Tasman District currently has 16 venues and 181 machines.
32. There is no conclusive evidence indicating that caps or sinking lids reduce problem gambling. A number of studies have commented on whether a link between machine numbers and problem gambling exists. The studies have had mixed results.
33. The Problem Gambling Foundation is currently quoting to Councils a study done by John Storer, Max Abbott and Judith Stubbs using Australian and New Zealand data. After reading the full study and reviewing the research data it does not appear that any strong correlation exists, and in fact the opposite conclusions could have easily been drawn. The table below is a summary of the data used which was central to the study. The data seems to suggest anything but a clear linear correlation.



34. What the Problem Gambling Foundation doesn't mention in their submissions is that when Professor Max Abbott looked only at the New Zealand data in 2006 he concluded that a sinking lid policy or a cap on machine numbers will have little (if any) impact on problem gambling. In the 2006 publication *Do EGMs And Problem Gambling Go Together Like a Horse and Carriage?* Professor Max Abbott noted:

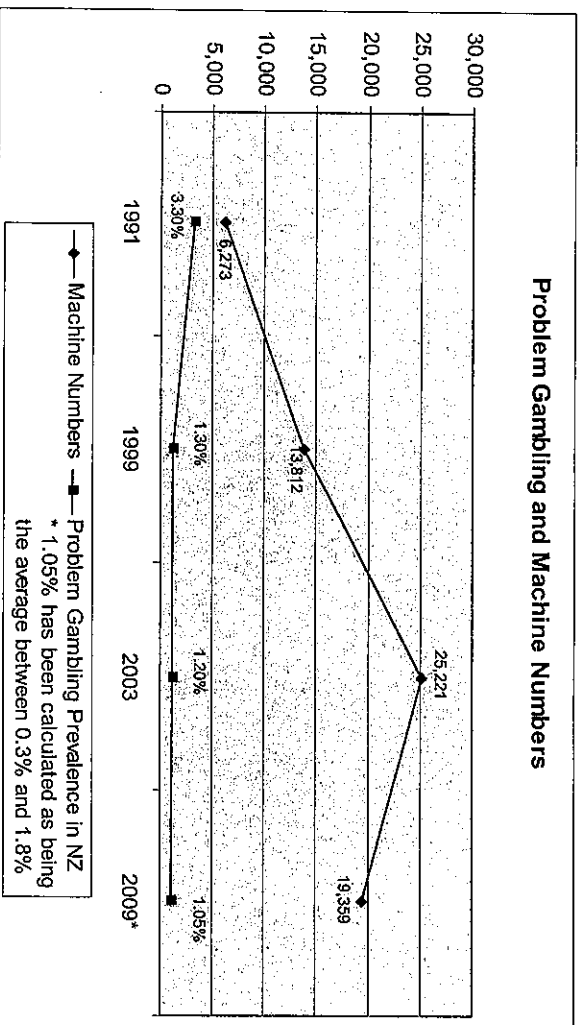
"EGM reductions and the introduction of caps generally appears to have little impact" (page 1).

"Over time, years rather than decades, adaptation ('host' immunity and protective environmental changes) typically occurs and problem levels reduce, even in the face of increasing exposure." (page 6).

"Contrary to expectation, as indicated previously, although EGM numbers and expenditure increased substantially in New Zealand from 1991 to 1999, the percentage of adults who gambled weekly dropped from 48% to 40%. This is of particular interest because it suggests that greater availability and expenditure do not necessarily increase high-risk exposure." (page 14).

35. The best evidence appears to be the historical problem gambling rates in New Zealand and machine numbers. These factors are known. When we look at machine numbers and the problem gambling prevalence rate as detailed in the graph below it appears clear that there is no correlation between gaming machine numbers and problem gambling rates.

Problem Gambling and Machine Numbers



36. A sinking lid policy or a cap is unlikely to reduce problem gambling but will reduce the amount of funding available to Tasman District community groups. Problem gamblers are people who are addicted to gambling. If a new bar is established and the policy prevents that bar from hosting gaming machines, a person who is addicted to gambling will simply travel the short distance to the next bar which has gaming machines or worse move to another form of gambling such as internet gambling. Other forms of gambling such as internet gambling are legal in New Zealand, and do not have the safeguards that gaming venues have and do not return any funds to the community. In the article "Gambling billions flowing overseas" published by the New Zealand Herald on 17 June 2009 David Coom, the Problem Gambling Foundation spokesman was quoted as follows:

"Problem Gambling Foundation spokesman David Coom said the survey confirmed that overseas online gambling was "a really fast-growing problem."

"It's basically totally unregulated and there's no ability to do any host responsibility around it," he said.

"One of the big issues with problem gambling is that it flourishes and thrives in secrecy, and of course online you can just sit at home and access it all you like."

"We are starting to see cases come through where parents are bringing in their teenagers who are spending up to 60 hours a week online. We are just about to embark on some research with youth to see what actually is going on."

"If the survey is correct, it means that about a sixth of New Zealand's total gambling spending is going overseas, paying no New Zealand taxes and returning nothing to the community."



Requirement for Community Consultation and a Hearing in Respect of All New Applications

37. We have reviewed all the Gambling Venue policies and Board Venue policies which are in place in New Zealand. The Tasman District Council's policy is one of the only policies which we are aware of which requires that every class 4 venue or Board Venue application be subject to public submissions.
38. It is submitted that the current process is unduly complicated and costly. The policies are required by the Act to be reviewed every 3 years. During the review process the public's views are heard during the special consultation process. The community views can be considered, balanced and recorded in the policies. It is therefore submitted that it is not necessary for a separate consultation process to be undertaken for each new Board Venue or class 4 venue.
39. Requiring a hearing for each application creates uncertainty and makes it difficult for a new venue to commit to entering into a long term lease or to purchase a property.
40. In summary the separate consultation process is costly and results in delays and uncertainty.

Conclusion

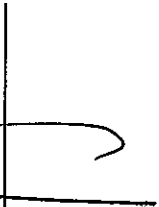
41. Board Venues are different from class 4 venues. Race and sports betting has a very low prevalence of problem gambling. A Board Venue is subject to all the stringent requirements of the Racing Act 2003. The New Zealand Racing Board ensures that all of their venue staff are well trained in problem gambling awareness and harm minimisation. It is submitted that Council fully separate the Board Venue and class 4 venue policies and each policy have its own separate public consultation. It is suggested that the class 4 venue policy be reviewed in three years but the Board Venue policy be reviewed in two years and simply rolled over if there is no need for change. This will ensure that the Board Venue policy is considered on its own merits.

42. It is acknowledged that the Council needs to strike a balance between the costs and benefits of class 4 gambling. It is accepted that a small percentage (between 0.3% and 1.8%) of people who play gaming machines do have a problem with their gambling. Casual expenditure on gaming machines is a form of entertainment for a lot of people and over 98% of the public are not adversely affected. Gaming machines provide a considerable amount of community funding to local community groups each year. This funding is the lifeblood of many organisations within the Tasman District.

43. The gaming industry has now reached a point where it is heavily regulated by legislation which is described by the DIA as world leading. Machine numbers, venue numbers and community funding is steadily in decline. In light of the new regulations and naturally decreasing machine numbers it is submitted that there is no need to change the current policy. A cap or sinking lid will not reduce problem gambling but will reduce community funding opportunities.

44. In order to reduce the cost and complexity of applications (and thus increase the amount of funds available for distribution to the community) it is submitted that the community views can be appropriately received and addressed during the regular policy review and consultation process and that is it not necessary for a separate consultation and hearing to be held in respect of all new Board Venue and class 4 venue applications.

45. We wish to speak to our submission (by teleconference if possible).



1 June 2010

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Tasman District Council

The Racing Act 2003

Draft TAB Board Venue Policy

August 2010

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Appendix 1: Application for Territorial authority Consent for a Board Venue3

1. PURPOSE

The Tasman District Council is required by the Racing Act 2003 to produce a policy that has regard to the social impact of gambling within the District. The Special Consultative Procedure under Section 83 of the Local Government Act 2002 and requirements of section 65E of the Racing Act 2003 have been followed, with submissions being heard and the following resolution passed:

...to be inserted after consultation and E & P Committee meeting...

CARRIED

2. OBJECTIVES OF THIS POLICY

2.1 To minimise the harm to the community caused by gambling.

2.6 To allow those who wish to participate in New Zealand Racing Board racing or sports betting to do so safely and responsibly within the District.

3. POLICY SCOPE

3.1 The policy covers stand alone TAB Board Venues, which are owned or leased by the New Zealand Racing Board. Council consent is not required under the legislation to establish a TAB facility in a bar, hotel or club. If a TAB Board Venue wishes to also host gaming machines a separate application must be made under Council's Class 4 gambling policy and the TAB Board Venue must also meet the additional criteria set out in that policy.

4. NEW ZEALAND RACING BOARD GAMBLING VENUES

4.1 Venues for racing and sports betting operated by the New Zealand Racing Board may be established subject to:

- (a) meeting application and fee requirements;
- (c) the venue shall have relevant staff training programme and gambling harm minimisation policy;
- (d) applications for new venues for racing and sports betting operated by the New Zealand Racing Board shall be advertised, with public submissions being accepted for a period of 10 days from the date of publication, after which Council shall approve or decline the venue consent application, with reasons for that decision being made available to all parties that expressed a view;
- (e) the primary activity of the venue shall be for racing and sports betting operated by the New Zealand Racing Board, and be owned or leased by the New Zealand Racing Board and used primarily for racing or sports betting; or be a racecourse;
- (f) operators of the venue must show that people under the age of 18 years have minimal access to the facility.

5. APPLICATIONS

- 5.1** Must be made on the form defined in Appendix 1 of this policy and must provide:
- (a) evidence of a police clearance for owners and managers of the venue;
 - (b) a copy of the proposed gambling harm minimisation policy and staff training programme;
 - (c) a site plan covering both gambling and other activities proposed for the venue, including details of each floor of the venue;
 - (d) name and contact details for the applicant;
 - (e) street address of premises proposed.

6. APPLICATION FEES

- 6.1** Any application for a territorial authority consent under Section 65B of the Racing Act 2003 shall be accompanied by the appropriate deposit and all fees due for the processing of the application must be paid before the territorial authority consent will issue.

APPENDIX 1: Application for Territorial Authority Consent for a Board Venue

*FORM NUMBER: RG3 DATE: 31 August 2010 [Pursuant to section 65B of the Racing Act 2003:
Applies to new racing and sports betting venues.]*

Section 1: Details of Applicant

Full Name of applicant: _____

Postal Address: _____

Post Code: _____

Contact Person: _____

Phone: _____

Fax: _____

E-mail: _____

Section 2: Details of Venue

Name of Venue: _____

Street Address: _____

Section 3: Information to be Provided with Application (Please tick box)

- Site plan covering activities proposed for the venue
- Evidence of a police clearance for the owners and managers of the venue
- A copy of the proposed gambling harm minimisation policy and staff training programme
- Evidence that the venue is leased or owned by the New Zealand Racing Board or a racecourse.

New Venues

Once an application for territorial authority consent for a new venue has been lodged, the applicant shall advertise the application in a local paper within 20 days of lodgement, giving a minimum of 10 working days for the acceptance of submissions by Council. If submissions are received, the Tasman District Council shall consider these and either approve or decline the venue consent application, with reasons for that decision being made available to all parties that expressed a view.

Application Fees

An application fee deposit of \$500.00 shall accompany any application. At the conclusion of the process when the application has been granted or declined, the applicant shall pay to Council such further fees necessary to cover the costs and disbursements of Council in processing the application. No such consent shall be issued by Council until all such fees have been paid.

The information that has been given is hereby certified to be true and correct.

Signature: _____

Date: _____

267

Draft Separate Class 4 Gaming Venue Policy – August 2010

Tasman District Council

The Gambling Act 2003

Draft Class 4 Gambling Venue Policy

August 2010

CLASS 4 GAMBLING VENUES POLICY: CONTENTS

| | |
|---|----------|
| | Page No. |
| 1. Purpose..... | 1 |
| 2. Objectives..... | 1 |
| 3. Operation of non-casino gaming machine gambling venues | 1 |
| Appendix 1: Operators of non-casino gaming machines | 2 |

1. PURPOSE

The Tasman District Council is required by the Gambling Act 2003 to produce a policy that has regard to the social impact of gambling within the District. The Special Consultative Procedure under Section 83 of the Local Government Act 2002 and requirements of section 102 of the Gambling Act 2003 have been followed, with submissions being heard and the following resolution passed:

...to be inserted after consultation and E & P Committee meeting...

CARRIED

2. OBJECTIVES OF THIS POLICY

- 2.1 To minimise the harm to the community caused by gambling.
- 2.2 To prohibit new non-casino gaming machine gambling machines or venues operating in Tasman District.
- 2.6 To allow those who wish to participate in gaming machine betting to do so safely and responsibly within the District.
- 3. **NEW NON-CASINO GAMING MACHINES NOT PERMITTED**
 - 3.1 Operation of new non-casino gaming machines or venues shall not be permitted. This will be achieved by Council declining to provide territorial authority consent pursuant to section 98 of the Gambling Act 2003. The premises and details of the numbers of non-casino gaming machines currently operating are listed in Appendix 1 of this Policy.

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APPENDIX 1 : Operators of non-casino gaming machines.

| Society Name | Venue name | Address | Number of GM allowed without additional sanction from Council | Additional Gaming Machines that may be installed by right |
|--------------------------------------|-----------------------------------|-------------------------------|---|---|
| Motueka Memorial R.S.A. Incorporated | Motueka Memorial RSA Incorporated | 49 High Street, Motueka | 9 | - |
| Pub Charity | Collingwood Tavern | Tasman Street, Collingwood | 4 | - |
| Pub Charity | Junction Hotel (Takaka) | 15 Commercial Street, Takaka | 18 | 4 |
| Pub Charity | Brightwater Motor Inn | 1 Lightband Road, Brightwater | 3 | - |
| Pub Charity | Wakefield Hotel | 48 Edward Street, Wakefield | 16 | 6 |
| The Lion Foundation | Motueka Hotel | 77 High Street, Motueka | 18 | - |
| The Lion Foundation | Post Office Hotel | 122 High Street, Motueka | 18 | - |
| Perry Trust | The Dodgy Sports Bar | 121 High Street, Motueka | 9 | - |
| Perry Trust | Riwaka Hotel | Main Road, Tasman | 6 | 2 |
| Club Waimaea Inc | Club Waimaea | 345 Queen Street, Richmond | 18 | - |
| New Zealand Community Trust | El Taverna | 183 Queen Street, Richmond | 18 | - |
| New Zealand Community Trust | Tapawera Hotel | 84 Main Road, Tapawera | 3 | - |
| New Zealand Community Trust | Mapua Tavern | 151 Aranui Road, Mapua | 12 | 4 |
| New Zealand Community Trust | Star And Garter Hotel | 252 Queen Street, Richmond | 18 | - |
| Trillian Trust | The Stables | 1 Mcglashen Avenue, Richmond | 12 | - |
| Perry Limited | Telegraph Hotel | 2 Motupipi Street, Takaka | 7 | - |
| Eureka Trust* | Railway Hotel* (Now Robbie's Bar) | 49 High Street, Motueka | 14* | -* |

Submitter details (please print clearly):

22 JUN 2010

Your name:

BARBARA ANN EDWARDS CURRIE

Your postal address:

11 SHEPHERD TCE
RIEMOND NELSON 7020

Your daytime phone number: 544 7005

Your email address:

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

^{for} Individual

on behalf of an organisation

If an organisation, please name the organisation: _____

Your comment (please continue overleaf if you require more space):

We have been told that an investigation into gambling habits has shown that the highest percentage of addicted gamblers were those who played 'the pokies', and that this percentage is rising. We believe that some official control of the number, and distribution of the machines, should be controlled legally.

signed: B.A. Currie B.A. Currie Date: 20.6.10

Please note: All written submissions will be made available to councillors and the public. Please write clearly, as all submissions are photocopied.

Please send your submission to:
Tasman District Council
<http://www.tasman.govt.nz/index.php?makeasubmission>

Private Bag 4
Richmond
Nelson 7050

Copies of the Draft Gambling Venues Policy
2010 is available at Council offices/Service
Centres, Libraries and on the Council website
www.tasman.govt.nz

Or drop your submission into Council at
189 Queen Street, Richmond, or your local
library or service centre by the due date.

Important Note: Closing day for submission is Thursday 8 July 2010

Submitter details (please print clearly):

Your name: (MRS) ANNETTE MAY WATERS

23

Your postal address: 13 HAUSTHORN WAY

RICHMOND 7020

Your daytime phone number: 53 - 544-2195

Your email address: _____

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

an individual or

on behalf of an organisation

If an organisation, please name the organisation: _____

Your comment (please continue overleaf if you require more space):

I support the "sinking lid" option for "Pokie" machines in the Tasman District area.

I believe that there is more harm to the community from problems caused by gambling, than by any perceived gain by grants to local groups. This is presented as a major donation when it is a miniscule ~~amount~~ percentage of the profits made.

Signed: ANNETTE MAY WATERS Date: 22/06/10

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Please send your submission to:
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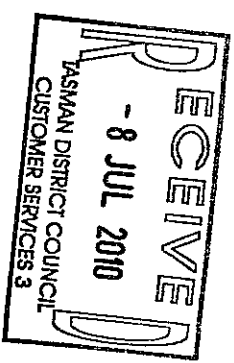
Or drop your submission into Council at
189 Queen Street, Richmond, or your local
library or service centre by the due date.

Important Note: Closing day for submission is Thursday 8 July 2010

no

270 - 276

277



Draft Gambling Venues Policy 2010

Submitter details (please print clearly):

Your name: JEANNETTE SWIFT

Your postal address: PO BOX 3263

RICHMOND

Your daytime phone number: 0274 305 074

Your email address: jeanette.swift@chance.org.nz

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

an individual or

on behalf of an organisation

If an organisation, please name the organisation:

HOSPITALITY ASSOCIATION

Your comment (please continue overleaf if you require more space):

OF NEW ZEALAND
NELSON BRANCH

Signed: J Swift Date: 07-07-10.

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Please send your submission to:
Tasman District Council
Private Bag 4
Richmond
Nelson 7050

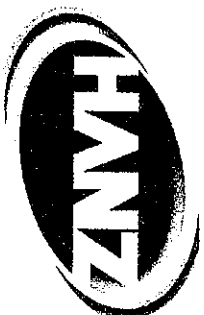
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HOSPITALITY ASSOCIATION OF NEW ZEALAND



Hospitality Association of New Zealand

SUBMISSION

on the

**Tasman District Council
Draft Gambling Venues Policy 2010**

July 2010

Hospitality Association of New Zealand
Nelson Branch

PO Box 3263, Richmond, Nelson
Phone : 0274 305 074
Email: jeanette.swift@hanz.org.nz

1. Introduction

The Hospitality Association of New Zealand (HANZ) Nelson Branch appreciates the opportunity to comment on the Tasman District Council Draft Gambling Venue Policy. The content of the policy are of considerable importance to our existing and future members with regard to the manner in which they can conduct a part of their business.

HANZ has approximately 2400 members throughout New Zealand and represents the majority of venue operators, operating class 4 gaming machines outside casino's and the club sector. Of the 17 venue operators in Tasman, 15 are HANZ members.

On behalf of the Nelson Branch of the Hospitality Association, I would like to make the following submissions on the draft policy.

2. Positive Aspects of Gambling for the Community

2.1 The operation of gaming machines in Class 4 venues is a key fund raising mechanism for the community. Millions of dollars are distributed to the community every year from gaming machine societies and trusts. Monies collected by corporate societies from gaming machines in clubs and bars provide community groups and organisations with access to funds that would otherwise not be available.

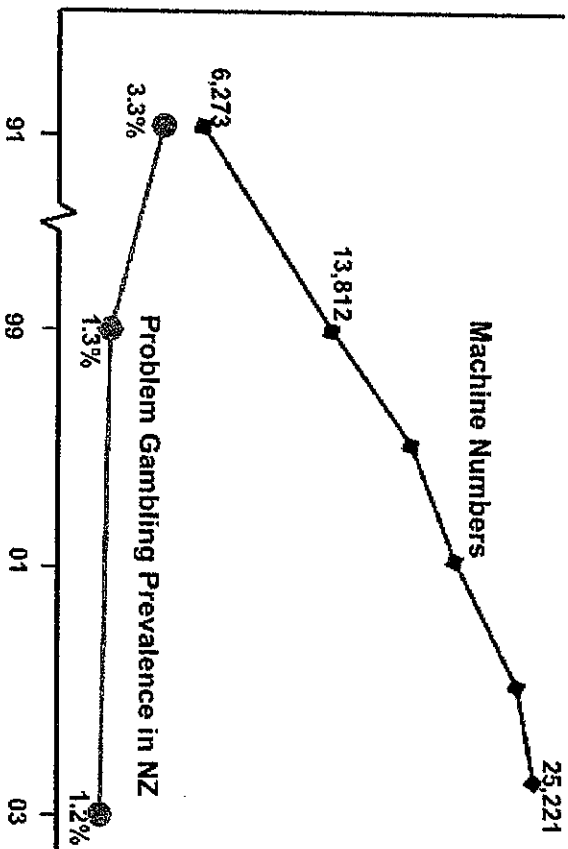
2.2 The Association and its members support the objectives of the policy with regard to the minimisation of harm caused by gambling and allowing individuals to safely participate in class 4 gambling in Tasman District Council.

As responsible hosts our members take seriously the issue of problem gambling and their responsibilities in this area. It should be noted that while some 95% of New Zealanders gamble in some form or another, problem gambling equates to only 2-3% of the population and the vast majority of gaming machine players do so within their means for entertainment and enjoyment. Those who have a problem with gambling need to be helped, however they will not be helped by limiting the number and location of machines. Such limitations will only simply reduce grants available to the community.

3. Gaming Machine Numbers and Problem Gambling

3.1 There is strong evidence that the number of gaming machines available in a community has no correlation to the number of problem gamblers. The graph below has been prepared from figures from Ministry of Health reports and Department of Internal Affairs records.

PG Prevalence risk and machine numbers



3.2 The majority of gaming machine users do so responsibly and for their own personal enjoyment with no adverse effects, happily meeting the cost of their chosen pastime while providing a source of valuable funds for community causes.

3.3 Problem gambling, like any addiction, is a destructive illness that requires focused treatment and attention. However, rather than reducing gaming machines as an easy visual measure the Association considers that education measures targeted at problem user to be more effective. These include the present measures of information on responsible gambling at venues, the use of personal exclusions and player information displays (PIDs or 'pop ups') displaying personal statistics to machine users.

4. Draft Gambling Venues Policy Consent Conditions

4.1 The Association supports, as the most effective way to manage the number of gaming machines, a 'cap' rather than a 'sinking lid' approach. This ensures the funds available to the community are preserved at current levels.

4.2 The Association further suggests that the policy should be amended to include the ability for relocation. This gives operators the opportunity of more flexibility in their businesses, an opportunity especially in economic times such as these that may enhance their chance of viability.

5. Summary

The Association reiterates the commitment of its members to working with the Council, and with the community in which they live and operate their premises, to continue to raise vital funding for that community, and to minimising any harm caused by gambling by acting as responsible hosts and operators.

The Association does not consider reducing machine numbers or a sinking lid an effective response to problem gambling and instead recommends focused education measures including information on responsible gambling at venues, the use of personal exclusions and player information displays more effective measures to treat individual problem gamblers.

We appreciate the opportunity to make the above comments and continue to be available for consultation on this important issue for the community.



Jeanette Swift
Regional Manager
HOSPITALITY ASSOCIATION OF NEW ZEALAND
NELSON BRANCH

278

Submitter details (please print clearly):

Your name: CASSIA MARVES

Your postal address:

45 Kihika Rd

Richmond

Your daytime phone number: 544-8263

Your email address: _____

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

an individual or

on behalf of an organisation

If an organisation, please name the organisation: _____

Your comment (please continue overleaf if you require more space):

I support the council's recommendation of a 'Sinking kid' Policy with regards to the Draft Gambling Venues Policy 2010. I believe that gaming machines encourage those people in our communities who can least afford it to gamble which in turn places a huge burden on society especially women and children
Statistics show that gaming machines tend to be located in lower socio economic areas.
Electronic monitoring showed that \$6 million was lost in the Tasman district last year to gaming machines

Signed: kasas

Date: 6.7.10

Please note: All written submissions will be made available to councillors and the public. Please write clearly, as all submissions are photocopied.

Please send your submission to:

Tasman District Council

Private Bag 4

Richmond

Nelson 7050

Alternatively email your using the electronic form at <http://www.tasman.govt.nz/index.php?Makeasubmission>

Copies of the Draft Gambling Venues Policy 2010 is available at Council offices/Service Centres, Libraries and on the Council website www.tasman.govt.nz.

Or drop your submission into Council at 189 Queen Street, Richmond, or your local library or service centre by the due date.

Important Note: Closing day for submission is Thursday 8 July 2010

with only a small percentage coming back to the community with no real impact on how it was distributed.

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There would appear to be a lack of transparency and efficiency in the accounting process.

As per Monitoring Regulations 2004 for every 1 dollar lost the money must be applied as follows:-

| | |
|----------------|-------------------------|
| 11 cents | GST |
| 30 " | Govt Duty |
| 33 " | Gaming & Showies |
| 36 " | Gaming Society expenses |
| <u>\$ 1.00</u> | |

The Dept of Internal Affairs show the number of machines in N.Z. reduced from 2003 to 2009 as did the revenue take but grants to the community have increased.

| <u>Date</u> | <u>Number of machines</u> | <u>Revenue \$</u> | |
|-------------|---------------------------|-------------------|-------------------------|
| 2003 | 25221 | 1.085 billion | |
| 2009 | 19739 | 938 million | Grants to the community |
| | | 151 million | |
| | | 315 million | |

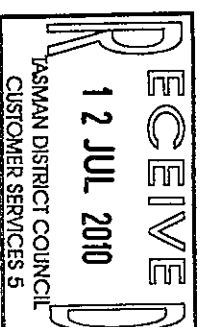
This shows that grants to the community have increased over time even though the number of gaming machines has been falling.

It would suggest that a "Sinking kid Policy" would not have any immediate impact on funds available for grants and charities.

Valerie

279

Draft Gambling Venues Policy 2010



Submitter details (please print clearly):

Your name: Nigel Muir

Your postal address: 142 Saxton Rd East
Stoke

Your daytime phone number: 03 546 7110

Your email address: Nigel@nol.southsman.org.nz

Would you like to speak to your submission at a Council meeting held for this purpose?

YES NO

Are you writing this submission as:

an individual or on behalf of an organisation

If an organisation, please name the organisation: Sport Tasman

Your comment (please continue overleaf if you require more space):

We understand the issues that can come with
gambling and do not condone the negative aspects that can
come but do also acknowledge the positive aspects
of community funding that comes through gambling
venues.

We believe new gaming machines should
be sited at an agreed number rather than completely
prohibiting new machines or venues

Signed: NMuir Date: 8/5/2010

Please note: All written submissions will be made available to Councillors and the public.
Please write clearly, as all submissions are photocopied.

Please send your submission to:
Tasman District Council
Private Bag 4
Richmond
Nelson 7050

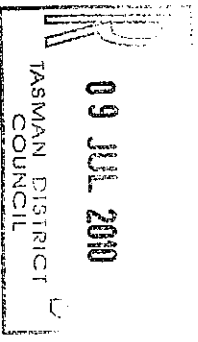
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280



TE RŌPŪ ĀWHINA MATE PETIPETI O AOTEAROA
 Problem Gambling Foundation of New Zealand

PGF Nelson: 50 Halifax Street

Fax: 03 5482969

PH: 03 5482230

FAX

| | | | |
|----------------------|----------------------------|---------------|--------------|
| To: | Graham Coradus | From: | pg Nelson |
| Organisation: | Tasman District Council | Date: | 9/7/10 |
| Fax No: | 1 | Pages: | 3 |
| Subject: | Gambling submissions | | |

Message:

280

Tasman District Council
Draft Gambling Venues Policy 2010

Subscriber details (please print clearly):

Your name: Prenda Maxwell

Your postal address: 14 Ahurmanni Drive,
Nelson

Your daytime phone number: 03 54 64 049

Your email address: Prendamaxwell@xtra.co.nz

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

an individual or

on behalf of an organisation

If an organisation, please name the organisation:

Problem Gambling Support Group

Your comment (please continue overleaf if you require more space):

I want to take this opportunity to ask you to consider the harm that can be caused by police machine use when drafting your Gambling Venues Policy 2010. Since 1992 I have been named by police machine use. I was always careful to avoid overuse of alcohol and other addictive products but I was not aware of the addictive qualities of gaming machines. I have had over 6 years of using gaming free over the years and I am

Signed: _____ Date: 7.7.10 PRE

Please note: All written submissions will be made available to Councilors and the public. Please write clearly, as all submissions are photocopied.

Please send your submission to:
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Nelson 7050

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Important Note: Closing day for submission is Thursday 8 July 2010

280

Tasman District Council
Draft Gambling Venues Policy 2010

Submission details (please print clearly):

Your name:

Your postal address:

Your daytime phone number:

Your email address:

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

an individual or

on behalf of an organisation

If an organisation, please name the organisation: G. A.

Your comment (please continue overleaf if you require more space):

BENEFIT A COMPULSIVE GAMBLER IT UNDERSTAND MORE THAN MOST
THE IMPACT THIS HAS ON AN INDIVIDUAL, FAMILY AND OTHERS.
I UNDERSTAND GAMBLING & THE INDUSTRY WILL NEVER STOP BUT
IT FEELS BELIEVE THAT ALL PROFITS SHOULD GO BACK INTO THE LOCAL
COMMUNITY IT COMES FROM.
GOLDEN HANDSHAKES, MONEY MOVING TO FRIENDS OF FRIENDS IS WRONG
AND ALL MONEY SHOULD BE MOVED BACK LOCALLY WITH NO EXCEPTIONS.
GAMBLING HURTS AND KILLS MANY PEOPLE AND NOT JUST THE
PERSON WHO HAS THE PROBLEM. PLEASE TAKE FULL RESPONSIBILITY AND
ACCOUNTABILITY FOR THE DECISION YOU ALL MAKE. THANK YOU.

Signed: _____

Date: _____

Please note: All written submissions will be made available to Councillors and the public.
Please write clearly, as all submissions are photocopied.
Please send your submission to:

Tasman District Council
Private Bag 4
Richmond
Nelson 7050

Alternatively email your using the electronic form at
<http://www.tasman.govt.nz/index.php?Menu=Submission>

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centre by the due date.

Important Note: Closing day for submission is Thursday 8 July 2010

280

Tasman District Council
Draft Gambling Venues Policy 2010

Subscriber details (please print clearly):

Your name: _____

Your postal address: _____

Your daytime phone number: _____

Your email address: _____

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

an individual or

on behalf of an organisation

If an organisation, please name the organisation: _____

Your comment (please continue overleaf if you require more space):

Gambling has been a nasty hold on me as a result I've lost a lot of friends and family as a result. The only thing that mattered was me and the machine, ignoring bills and paying my way. His has been a battle and being so afraid to ask for help. Nowadays things are getting easier and even though I feel tempted to gamble I try to attend meetings to meet other gamblers and hear their stories

Signed: _____ Date: _____

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Nelson 7050

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Important Note: Closing day for submission is Thursday 8 July 2010

Submitter details (please print clearly):

281
10 JUL 2010
10:00 AM
MURRAY McCASKEY

Your name:

MURRAY McCASKEY and JUDITH McCASKEY

Your postal address:

11A KINGSLEY PLACE
RICHMOND

Your daytime phone number: 544 4070

Your email address:

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

an individual or

on behalf of an organisation

If an organisation, please name the organisation:

Your comment (please continue overleaf if you require more space):

We oppose any extension of gambling facilities in the Tasman district - thus supporting any moves by the Council to restrict or even reduce these facilities - in particular the so-called "pokie machines".

We have lived in several low-income & marginalised communities & too often have seen the damage done through gambling. Pokie machines are seductive in their appeal & quickly lead to addiction - often for those who can least afford to be playing them.

Any argument in favour - pointing to the financial benefits accruing to charities from gambling profits - is quite deceptive, since it ignores the huge cost to the lives of individuals & families, particularly in marginal communities.

Signed: Murray McCaskey Date: 8th July '10

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Tasman District Council

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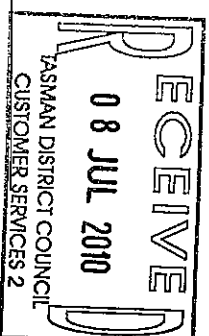
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189 Queen Street, Richmond, or your local library or service centre by the due date.

Important Note: Closing day for submission is Thursday 8 July 2010

282



Submitter details (please print clearly):

Your name: Ann Elizabeth Newman
Your postal address: 19 Cautley Street Richmond.

Your daytime phone number: 5440275

Your email address: N/A

Would you like to speak to your submission at a Council meeting held for this purpose?

YES

NO

Are you writing this submission as:

an individual or

on behalf of an organisation

If an organisation, please name the organisation: _____

Your comment (please continue overleaf if you require more space):

I fully support Council in its drive to reduce the number of gambling venues. There are more than enough opportunities now to participate in this activity. Gambling can be disastrous for the family now: debt more + more debt, and high debt, this leads to difficulty in feeding the family and the meeting of other needs; stress, threats of legal action, the taking up of secondary employment to pay off the debts. Parents tired
signed: Ann E. Newman Date: 7. 7. 2010 Cont =

Please note: All written submissions will be made available to councillors and the public. Please write clearly, as all submissions are photocopied.

Alternatively email your using the electronic form at

<http://www.tasman.govt.nz/index.php?Makeasubmission>

Tasman District Council
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Cont.

With the working of longer hours. Money that could be going into homes going to pay off bills that have accumulated. Time for the family curshort.

I know there will be "a squeal" that sports activities will not be funded as they are at present from gambling proceeds. Surely we can find a better method of funding sports clubs. than by this monetary drain on society. It doesn't show sport up in a good light when one considers that this is partly how it is funded!