Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

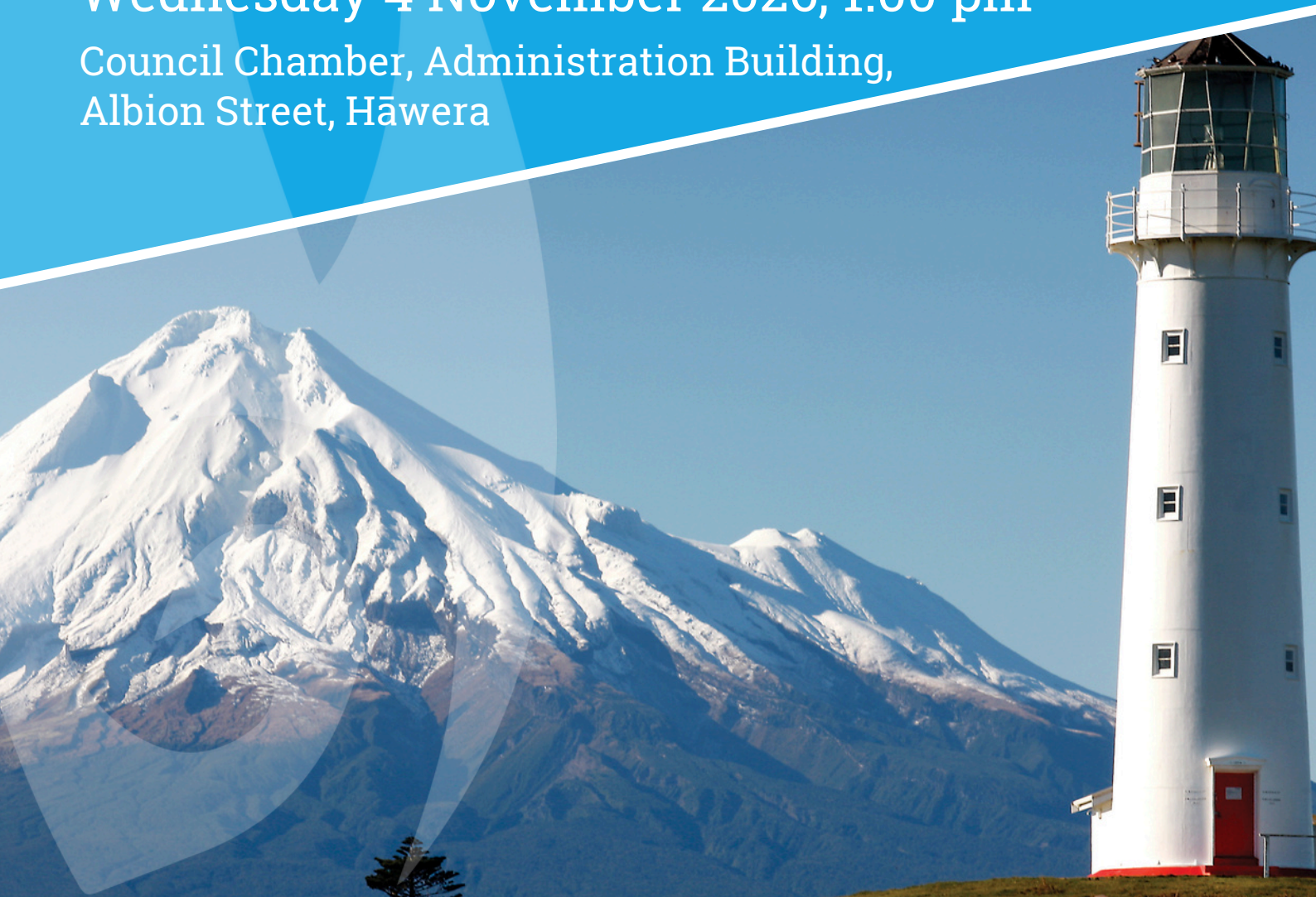
Rārangi take Kaunihera Whanokē

Extraordinary Council Agenda

To hear submissions on the Gambling Policies

Wednesday 4 November 2026, 1.00 pm

Council Chamber, Administration Building,
Albion Street, Hāwera



Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Purongo Whaitikanga
Governance Information

Ngā Mema o te Komiti / Committee Members



Phil Nixon
Mayor



Andy Beccard
Councillor



Mark Bellringer
Councillor



Heather Brokenshire
Councillor



Karen Cave
Councillor



Robert Northcott
Deputy Mayor



Racquel Cleaver-Pittams
Councillor



Janet Fleming
Councillor



Leanne Horo
Councillor



Aarun Langton
Councillor



Cheryl Luke-Maraki
Councillor



Diana Reid
Councillor



Brian Rook
Councillor



Garth Weir
Councillor

Apatono / Delegations

The Full Council's role is to carry out responsibilities under the Local Government Act 2002. It is the final decision-making authority within the Council and generally ratifies recommendations made by other committees.
It is made up of all Councillors and the Mayor.

Powers that cannot be delegated
The powers that cannot be delegated by the Council are:
(a) the power to make a rate
(b) the power to make a bylaw
(c) the power to borrow money, or purchase or dispose of assets, other than in accordance with the long-term plan
(d) the power to adopt a long-term plan, annual plan or annual report
(e) the power to appoint a chief executive
(f) the power to adopt policies required to be adopted and consulted on under the Local Government Act 2002 in association with the long term plan or developed for the purpose of the Local Governance Statement.
(g) the power to adopt a remuneration and employment policy

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Purongo Whaitikanga
Governance Information

Huinga Tangata / Attendance Register

Date	15/04/26	11/05/26	26/05/26	03/06/26	22/06/26	13/07/26	15/07/26	20/07/26	03/08/26	09/09/26	21/10/26
Meeting	O	E	E	O	E	E	O	E	E	O	O
Andy Beccard	√	A	√	√	√	√	√	√	√	√	√
Mark Bellringer	√	√	√	A	√	√	A	√	A	√	√
Heather Brokenshire	√	√	√	√	√	√	√	√	√	√	√
Karen Cave	√	√	√	√	√	√	√	√	√	√	√
Racquel Cleaver-Pittams	√	√	√	√	√	A	√	√	√	√	A
Janet Fleming	√	√	√	AO	√	√	√	√	√	√	√
Leanne Horo	√	√	AO	√	√	√	√	√	√	AO	√
Aarun Langton	√	A	√	√	√	A	A	A	A	√	√
Cheryl Luke-Maraki	√	√	AO	√	√	√	√	√	√	A	√
Phil Nixon	√	√	√	√	√	√	√	√	√	√	√
Robert Northcott	√	√	√	√	√	√	√	√	√	√	√
Diana Reid	√	√	√	√	√	√	√	√	√	√	√
Brian Rook	√	√	A	√	√	√	A	√	√	√	√
Garth Weir	√	√	√	√	√	√	√	√	√	√	√

Key

√ Attended
AO Attended Online
-- Was not required to attend
A Apology
Y Attended but didn't have to attend
X Did not attend - no apology given

Types of Meetings

I Inaugural
O Ordinary Meeting
E Extraordinary Meeting

He Karere Haumaru / Health and Safety Message

In the event of an emergency, please follow the instructions of Council staff. If there is an earthquake - drop, cover and hold where possible. Please remain where you are until further instrcution is given.

He Pānga Whakararu / Conflicts of Interest

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises betweeen their role as an elected member and any private or other external interest they might have.

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Rārangi
Agenda

Extraordinary Council

To hear submissions on the Gambling Policies

Wednesday 4 November 2026 at 1.00 pm

1. **Karakia**
2. **Matakore / Apologies**
3. **Tauākī Whakarika / Declarations of Interest**
4. **Kaitāpae-Kōrero / Submitter – Speakers**
5. **Tāpaetanga / Submissions**
6. **Karakia**

Karakia

1. Karakia

Ruruku Timata – Opening Prayer

Whaia, whaia, whaia te urutapunui a Tāne.
Tāne te waiora, Tāne te pūkenga, Tāne te wānanga
Tāne te whakaputa nei I te whaiao, I te ao mārama
Tīhei mauri ora

Let us follow in the footsteps of Tāne (The god who gave us knowledge)
Tāne the lifesource, Tāne the skilful, Tāne the knowledgeable
Tāne who brought light to the world
So give us life.

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Matakore
Apologies

2. Matakore / Apologies

Leave of Absence: *The Council may grant a member leave of absence following an application from that member. Leave of absences will be held in the Public Excluded section of the meeting.*

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Ngā Whakaputanga
Declarations of Interest

3. Tauākī Whakarika / Declarations of Interest

Notification from elected members of:

a) Any interests that may create a conflict with their role as an elected member relating to the items of business for this meeting; and

b) Any interests in items in which they have a direct or indirect pecuniary interest as provided for in the Local Authorities (Members' Interests) Act 1968.

Declarations of Interest: *Notification from elected members of: Any interests that may create a conflict with their role as an elected member relating to the items of business for this meeting; and Any interests in items in which they have a direct or indirect pecuniary interest as provided for in the Local Authorities (Members' Interests) Act 1968*

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Kaitāpae - Kōrero
Submitters - Speaking

4. Kaitāpae – Kōrero / Submitters – Speaking

No.	Name	Organisation	Time	Page No.
40	Darleena Christie	Netball Taranaki Inc	1.05 pm	89
44	Jarrod True	Gaming Machine Association of New Zealand	1.15 pm	97
48	Ben Hodges	NZCT	1.25 pm	143

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Tāpaetanga Submissions

5. Tāpaetanga / Submissions

No.	Submitter	Organisation	Page No.
1	Sheena O'Flaherty		11
2	Gavin Stratton		13
3	Paul Cornish		15
4	Debra Stratton		17
5	Robert Smith		19
6	Sarah Casperson-Bowles		21
7	Merissa Dalton		23
8	Paula-Marie Carly Frank		25
9	Renate Staudinger		27
10	Bailey Wisnewski		29
11	Graeme Kempton		31
12	Jessica Patu Hindes		33
13	Death Robert		35
14	Kairo Garrett		37
15	Kimberly Scott		39
16	James Gibbon		41
17	Anna Thomson		43
18	Paul Cornish	Hawera Assembly of God Church	45
19	Ellie Woodhead		47
20	Campbell Mason		49
21	Rosemary Anne Joyce		51
22	Meagan Edmonds		53
23	Reg van Liijf		55
24	Jimmy Fastier	Taranaki Rugby	57
25	Stephen Dawson		59
26	Cobus van der Merwe		61
27	Michelle Mills		63
28	Paul Baker		65
29	Jonathon Pells		67
30	Vicky Finlayson		69
31	Kareena Udy		71
32	Wade Sherson		73
33	Gemma Nunn		75
34	Brock Fairweather		77
35	Phoebe Jury		79
36	Jessica Graham		81
37	Ann Hay	Netball Central Zone	83
38	Abbey Hagley		85
39	Kieran More		87
40	Darleena Christie	Netball Taranaki Inc	89
41	Nicky Baker	South Taranaki Whanau Centre	91

42	Chris Carrett		93
43	Barbara Davis		95
44	Jarrod True	Gaming Machine Association of New Zealand	97
45	Mereana Graham	The Problem Gambling Foundation Ltd	126
46	Michael Colhoun	Mapu Maia Limited	135
47	Helena Louisa Parker	Swimming Taranaki	140
48	Jo Salisbury	NZCT	143
49	Dr Inbal Salz	Health New Zealand	164
50	Martin Bradley	Grassroots Trust Limited	176

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Sheena Last name: O'Flaherty

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:
All of District

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

1

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Gavin Last name: Stratton

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

2

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Paul Last name: Cornish

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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5

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Debra Last name: Stratton

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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4

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5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

Submitter Details

Submission Date: 14/09/2026

First name: Robert Last name: Smith

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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A sinking lid should be applied over:

All of District

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5

Review of Gambling Policies

Submitter Details

Submission Date: 14/09/2026

First name: Sarah Last name: Caspersen-Bowles

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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6

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5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Merissa Last name: Dalton

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

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5

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: PAULA-MARIE CARLY Last name: FRANK

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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8

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

My mother was a gambler and I have eorked in venues with pokie addicts. Its a scourge on society. It is not harmless fun. Limiting pokie machines to 9 will cut the amount of people who already have no money, spending all day wasting it on them.Id vote for none if there was that option.

5

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Renate Last name: Staudinger

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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9

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Bailey Last name: Wisnewski

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
Option 2	The establishment and relocation of venues and the maximum number of machines per venue remain unchanged but a 'sinking lid' policy for the total number of gaming machines would be applied over part or all of the District. A 'sinking lid' policy means if an existing venue is disestablished or stopped having gaming machines, a new venue would not be allowed to take on those machines. As a result, the number of gaming machines in the District would reduce over time.
Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

10

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Graeme Last name: Kempton

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

11

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Review of Gambling Policies

5

Submitter Details

Submission Date: 14/09/2026

First name: Jessica Patu Last name: hindes

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

12

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Your Comments

Get rid of all the machines . They arent any good for anyone except the select few who own them . Gambling machines should be in a casino .

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 15/09/2026

First name: Death Last name: Robert

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3 - I prefer that there should be no restrictions on the numbers of Class 4 gambling venues or machines throughout the South Taranaki District.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

13

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Option 3 - I prefer that the existing policy is amended to allow one or more new stand-alone TAB venues to be established in one or more parts of the District.

Your Comments

I support Option 3 for both policies.

I believe Council's gambling policy needs to recognise how significantly gambling has changed in recent years, particularly with the rapid growth and accessibility of online casinos.

Reducing the number of regulated, land-based gaming machines does not necessarily reduce gambling. People who wish to gamble now have immediate access to online casinos through their phones, computers and other devices, 24 hours a day and from their own homes.

In my view, it is preferable for gambling that is going to occur anyway to take place in regulated local venues rather than simply pushing more people towards online alternatives.

Physical gaming venues provide controls that online gambling cannot replicate in the same way. Staff can observe customers, intoxicated people can be refused service, age restrictions can be physically enforced, problem gambling behaviour can potentially be identified, and people are required to physically travel to and remain at a venue.

By comparison, a person gambling online can potentially gamble alone at home at any hour of the day or night. There is no physical closing time, no staff member standing in front of them and no need to leave the gambling environment. The casino is effectively available in their pocket.

Another important consideration is the benefit that Class 4 gaming provides to New Zealand communities. A significant proportion of the proceeds from Class 4 gaming is required to be returned to authorised community purposes. Sports clubs, community organisations, charities and other local groups rely heavily on gaming trust funding.

This is particularly important in smaller communities such as South Taranaki, where fundraising opportunities and sponsorship pools are already limited.

A policy designed simply to reduce the number of machines may therefore have unintended consequences. It may reduce an important source of community funding without necessarily achieving a corresponding reduction in gambling. Some gambling expenditure may simply migrate online.

I am not suggesting that gambling is harmless. Problem gambling is a genuine issue and strong harm-minimisation measures should remain in place. However, policy should focus on reducing gambling harm rather than simply reducing the number of physical gaming machines.

There is an important distinction between those two objectives.

If demand for gambling continues to exist, I would rather see a controlled number of regulated machines operating in supervised local venues, subject to New Zealand law and harm-minimisation requirements, than see Council policy unintentionally encourage gambling to move further towards an online environment where people can gamble privately and continuously.

Council should also consider whether a sinking-lid or similarly restrictive policy remains an effective harm-reduction tool in an era where a person can access hundreds of gambling websites without leaving their home.

The gambling environment has changed considerably. Local policy should change with it.

For these reasons, I support Option 3 on both questions. I believe it provides a more practical balance between personal choice, effective regulation, harm minimisation, the changing nature of online gambling, supporting responsible local hospitality venues, and retaining valuable funding for South Taranaki community organisations.

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 15/09/2026

First name: Kairo Last name: Garrett

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

14

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 15/09/2026

First name: Kimberly Last name: Scott

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3 - I prefer that there should be no restrictions on the numbers of Class 4 gambling venues or machines throughout the South Taranaki District.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

15

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 15/09/2026

First name: James Last name: Gibbon

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo Preferred option.	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3 - I prefer that there should be no restrictions on the numbers of Class 4 gambling venues or machines throughout the South Taranaki District.

TAB Venues Policy

Option 1 the status quo Preferred option.	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

16

Option 3 - I prefer that the existing policy is amended to allow one or more new stand-alone TAB venues to be established in one or more parts of the District.

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 15/09/2026

First name: Anna Last name: Thomson

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

17

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Review of Gambling Policies

5

Submitter Details

Submission Date: 15/09/2026

First name: Paul Last name: Cornish

Organisation:

Hawera Assembly of God Church

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.

18

Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

5

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 15/09/2026

First name: Ellie Last name: Woodhead

Prefered method of contact Postal

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3 - I prefer that there should be no restrictions on the numbers of Class 4 gambling venues or machines throughout the South Taranaki District.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

19

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 16/09/2026

First name: Campbell Last name: Mason

Prefered method of contact Postal

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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A sinking lid should be applied over:

All of District

TAB Venues Policy

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Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

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Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

i think based off latest figures the gambling machine has an annual gross profit of ~$55,000 a year. With the average wage around ~$36,000. Less gambling machines. the harm gambling is causing as the economy tightens up is horrendous and its small rural communitites that notice it the most. Sinking lid would allow the community to see them less and have children think its not normal to gamble. Alcohol is now probably doing less harm than gambling. I havent checked that as a fact thats purely speculation. Thanks for taking the time to read this, have fun

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 18/09/2026

First name: Rosemary Anne Last name: Joyce

Prefered method of contact

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

21

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 22/09/2026

First name: Meagan Last name: Edmonds

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

22

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 20/09/2026

First name: Reg Last name: van Liijf

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
Option 2	The establishment and relocation of venues and the maximum number of machines per venue remain unchanged but a 'sinking lid' policy for the total number of gaming machines would be applied over part or all of the District. A 'sinking lid' policy means if an existing venue is disestablished or stopped having gaming machines, a new venue would not be allowed to take on those machines. As a result, the number of gaming machines in the District would reduce over time.
Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

23

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 30/09/2026

First name: Jimmy Last name: Fastier

Organisation: Taranaki Rugby

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
	The Policy would be amended to allow one or more new stand-alone venues to be

Option 3	established in one or more parts of the District.

24

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

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Taranaki Rugby was established in 1885 and delivers the game to 6,000+ participants around Taranaki Maunga annually through 15+ clubs, 12+ secondary schools and 100+ primary schools playing the game.

This requires significant resource to deliver quality experiences. Rugby is a way of life in Taranaki and with the support of Class 4 Gaming grants Taranaki Rugby creates positive experiences for the community – young and old.

Taranaki Rugby received $500,000+ for operational activity in 2025 from a range of Class 4 grants supported by venues across the Taranaki region.

TRFU apply for specific things they cannot otherwise afford. Examples include community team wages in the form of administrators, coach development staff and rugby development officers., event costs and amateur representative team overheads. These resources support Taranaki people across the district.

Running organised sport is getting harder financially. Inflation has pushed up costs. TRFU and other community-based organisations need the significant funding that gambling trusts have shared with the community for the last 50 years to support local communities.

TRFU support the existing policy regarding the establishment and relocation of venues and the number of gaming machines remaining unchanged in the South Taranaki District Council region.

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 05/10/2026

First name: Stephen Last name: Dawson

Prefered method of contact Postal

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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A sinking lid should be applied over:

All of District

TAB Venues Policy

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Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 2 - I prefer that the existing policy is amended to allow one or more new stand-alone TAB venues to be established throughout the South Taranaki District.

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Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

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Submitter Details

Submission Date: 05/10/2026

First name: Cobus Last name: van der Merwe

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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TAB Venues Policy

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Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Your Comments

Gambling does not add value to our society and is normally associated with increased poverty in a community where introduced. We would like feedback if the council can give reasons for holding a different view.

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 05/10/2026

First name: Michelle Last name: Mills

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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All of District

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Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 05/10/2026

First name: Paul Last name: Baker

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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TAB Venues Policy

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28

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 05/10/2026

First name: Johnathon Last name: Pells

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo Preferred option.	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

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29

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Review of Gambling Policies

5

Submitter Details

Submission Date: 05/10/2026

First name: Vicky Last name: Finlayson

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

30

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

Anything that can be done to reduce community harm, needs to be activated. A sinking lid policy attends to this. Our children are far more important than access to gambling, which is geared to create addictions and financial losses. Our children deserve better from those in power, who can mitigate harm to our communities. Thanks for considering my voice in this matter - appreciated.

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 05/10/2026

First name: Kareena Last name: Udy

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:

All of District

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

31

Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 05/10/2026

First name: Wade Last name: Sherson

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo Preferred option.	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3 - I prefer that there should be no restrictions on the numbers of Class 4 gambling venues or machines throughout the South Taranaki District.

TAB Venues Policy

Option 1 the status quo Preferred option.	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

32

Option 3 - I prefer that the existing policy is amended to allow one or more new stand-alone TAB venues to be established in one or more parts of the District.

5

Review of Gambling Policies

5

Submitter Details

Submission Date: 05/10/2026

First name: Gemma Last name: Nunn

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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A sinking lid should be applied over:

All of District

TAB Venues Policy

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Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

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Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

pokie machine demographics are worrying. We should be removing them as much as we can from society. From someone who didnt grow up with them to having a partner whos family did it is highly concerning the behaviour this causes. Gambling is an addiction and if pokies and tab were not there for them they wouldnt be able to use it. Most pubs that run these machines are open most days with no legitimate customers only gambling users. Review and get rid of them for a better society and future of south taranaki.

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 06/10/2026

First name: Brock Last name: Fairweather

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo Preferred option.	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3 - I prefer that there should be no restrictions on the numbers of Class 4 gambling venues or machines throughout the South Taranaki District.

TAB Venues Policy

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Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

34

Option 3 - I prefer that the existing policy is amended to allow one or more new stand-alone TAB venues to be established in one or more parts of the District.

Please state the areas where trading should occur and why.

I believe venues should be aboud to di what they want an out whatever they would like into there own properties

5

Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 06/10/2026

First name: Phoebe Last name: Jury

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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TAB Venues Policy

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35

Option 3 - I prefer that the existing policy is amended to allow one or more new stand-alone TAB venues to be established in one or more parts of the District.

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Review of Gambling Policies

5

Submitter Details

Submission Date: 07/10/2026

First name: Jessica Last name: Graham

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

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Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

36

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 07/10/2026

First name: Ann Last name: Hay

Organisation: Netball Central Zone

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
	The Policy would be amended to allow one or more new stand-alone venues to be

37

Option 3	established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

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Netball Central Zone supports Option 1 for both the Class 4 Gambling Venues Policy and the TAB Venues Policy.

Netball Central Zone supports 12 Netball Centres across the lower North Island, including Netball Taranaki and communities within South Taranaki. Our role is to support participation, strengthen local delivery and help ensure netball remains accessible and sustainable for our communities. Across our wider Zone, our network supports more than 35,000 players.

We recognise the importance of councils having appropriate controls in place to minimise the potential harm associated with gambling. At the same time, we ask Council to recognise the important contribution that Class 4 gaming funding makes to community sport and recreation.

Community sporting organisations operate in an increasingly challenging financial environment. Costs associated with facilities, equipment, workforce, travel, programme delivery and participation continue to increase, while maintaining affordable fees is important to ensuring cost does not become a barrier to participation. Grant funding is therefore an important part of the funding mix that enables community organisations to continue providing accessible opportunities.

For netball, this support contributes to the wider system that enables quality community sport to be delivered, including developing coaches and officials, strengthening local organisations and providing development opportunities for participants.

We therefore support the Council retaining its existing Class 4 Gambling Venues Policy rather than introducing a sinking lid. In our view, the existing policy provides an appropriate balance between controlling the availability of gambling opportunities and recognising the contribution that gaming proceeds make back into local communities.

We also support retaining the existing TAB Venues Policy, which does not allow stand-alone TAB venues.

Netball Central supports a responsible and balanced approach that seeks to minimise gambling harm while preserving an important source of funding for community organisations delivering positive social, sporting and participation outcomes.

Thank you for the opportunity to contribute to the review of South Taranaki District Council's Gambling Policies.

Ann Hay

Review of Gambling Policies

5

Submitter Details

Submission Date: 07/10/2026

First name: Abbey Last name: Hagley

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

38

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

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Submitter Details

Submission Date: 08/10/2026

First name: kieran Last name: more

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo Preferred option.	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 the status quo Preferred option.	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

39

Option 3 - I prefer that the existing policy is amended to allow one or more new stand-alone TAB venues to be established in one or more parts of the District.

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Review of Gambling Policies

5

Submitter Details

Submission Date: 08/10/2026

First name: Darleena Last name: Christie

Organisation: Netball Taranaki Inc

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo Preferred option.	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 the status quo Preferred option.	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be

Option 3	established in one or more parts of the District.

40

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

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As an organisation fortunate to receive funding from New Zealand Community Trust (NZCT), we simply could not do the mahi we do across the Taranaki region without the incredible support this funding provides towards our wages and salaries.

This investment enables our team to deliver competitions, programmes and development opportunities for players, coaches, managers, umpires, officials, supporters and the many volunteers who make up our netball community across Taranaki.

The support we receive from NZCT plays a vital role in helping us grow and strengthen netball throughout the region, ensuring our people have the opportunities, support and pathways they need to participate, develop and thrive.

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 08/10/2026

First name: Nicky Last name: Baker

Organisation: South Taranaki Whanau Centre

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be

Option 3	established in one or more parts of the District.

41

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 11/10/2026

First name: Chris Last name: Garrett

Prefered method of contact Postal

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

42

Option 2 - I prefer that the existing policy is amended to allow one or more new stand-alone TAB venues to be established throughout the South Taranaki District.

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Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 13/10/2026

First name: Barbara Last name: Davis

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

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Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

43

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

I personally think the gambling policy is working fine as it is.

5

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 15/10/2026

First name: Jarrd Last name: True

Organisation:

Gaming Machine Association of New Zealand

Prefered method of contact

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

Your Comments

Introduction

1. The Gaming Machine Association of New Zealand ("the Association") represents the vast majority of the gaming machine societies that operate in New Zealand. The Association wishes to provide South

Taranaki District Council with pertinent information regarding gaming machine gambling to help council to make a balanced, evidence-based decision.

Summary

2. The Association supports option 1:
   - Retention of the current cap of 121 machines (a cap at current numbers).
   - Retention of the relocation provision.

Local Data and Information

3. The amount of gaming machine grants made to South Taranaki District-based organisations is posted on the granted.govt.nz website. In 2025, grants totalling **$765,497** were made to the South Taranaki District.

4. In addition to the external grants, club venues use the proceeds from the machines to support their members and their club facilities. Two of the 10 venues that operate gaming machines in the South Taranaki District are club venues, the South Taranaki Club Inc and Masse.
5. Problem gambling presentations from persons based in the South Taranaki District are extremely low. The Ministry of Health keeps a record of the number of people in each territorial authority who seek help via the phone, text, email or face-to-face counselling services that are available. The South Taranaki District presentation data[1] (Table 10 – excludes brief interventions) are as follows:

2022/23 **new clients 0** **total clients seen 3**
2021/22 **new clients** 1
total clients seen 1

Relocation Policy

6. The status quo relocation policy is sensible and should be retained.
7. In September 2013, Parliament recognised the merit in enabling venues to relocate, and expressly amended the Gambling Act 2003 to enable venues to relocate and retain the same number of machines when a relocation consent was obtained.

8. Venue relocation is a harm minimisation tool.
9. It is good that the current policy enables venues to relocate out of a high deprivation area to a lower deprivation area. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in high deprivation locations.
10. It is good that the current policy enables venues to relocate out of a suburban/residential area to a more suitable area, such as a central business district. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in undesirable residential locations.

11. It is good that the current policy supports businesses that wish to move to new, modern, refurbished premises. Allowing local businesses to upgrade their premises and provide a more modern, attractive offering to the public helps to revitalise business districts, improves the local economy and encourages tourism.

12. The first venue to relocate under the amendments made to the Gambling Act 2003 was the Te Rapa Tavern in Hamilton. The photos below show the old, rundown premises and the new modern premises. The redevelopment cost $3,000,000.
13. It is good that the current policy enables venues to move to smaller, more suitable premises. Enabling venues to move away from large premises, with large car parking areas, to newer, smaller premises also has the advantage of freeing up large areas of land, which may be better used for affordable high-density housing.

14. It is good that the current policy enables venues to move out of earthquake-prone buildings to stronger, more modern buildings. This is a health and safety issue.

15. It is also reasonable to allow venues to relocate when the move is due to onerous rental sums or lease terms being imposed. Currently, once a venue has obtained a licence to host gaming machines its value is artificially increased. This often leads to landlords demanding higher than normal rentals. Allowing more flexible relocation prevents landlords demanding unreasonable rentals as it gives the venue operator the ability to relocate to an alternative venue.

Benefits from Gaming Machines - Gambling is an Enjoyable Activity

16. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2025 New Zealand Gambling Survey[2] found that 64.1% of adult New Zealanders had participated in some form of gambling in the previous 12 months (estimated to be 2,760,000 New Zealanders aged 15 and over).

17. The majority of people who gamble do so because they find it an enjoyable activity. This was observed by Suits (1979, p. 155)[3], who stated:

> Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.

18. Gambling for the non-addicted gambler may be an avenue for socialising, stress relief and a way of having fun. Contrary to how it may appear from a non-gambler's perspective, gamblers do not necessarily anticipate they will make money from gambling. Parke (2015)[4] stated:

> Players mostly realise that they are paying for a leisure experience. They are not expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.

Benefits from Gaming Machines - Positive Wellbeing Impact from Gambling in New Zealand

19. The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis[5], found that gambling in New Zealand had a net positive wellbeing benefit totalling around

$1.74b to $2.16b per annum.

Revenue Breakdown

20. The return to players on a non-casino gaming machine is required to be set between 78% and 92%, with most being set at 91.5%. On average, for every $1.00 gambled, 91.5 cents are returned to the player in winnings. The money retained is typically allocated as follows:

Typical Distribution of Gaming Machine Profits

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	1.08%	1.23%
DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.53%	43.16%

Gaming Machines – Key Facts

21. Gaming machines have been present in New Zealand communities since the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued to Pub Charity on 25 March 1988, over 38 years ago.

22. New Zealand has a very low problem gambling rate by international standards. The March 2025 New Zealand National Gambling Survey[6] found that the combined rate of moderate- risk gambling and problem gambling was 2.4% of the adult population (aged 15). This equates to approximately 104,000 adults. A subsequent OIA request[7] revealed that this was comprised of 0.5% problem gambling and 1.9% moderate risk gambling. The problem gambling rate is for all forms of gambling, not just gaming machine gambling.

23. All gaming machine societies contribute to a problem gambling fund. This fund provides over $25 million per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The funding is ring-fenced and not able to be redirected to other health areas.

24. An excellent, well-funded problem gambling treatment service exists. The problem gambling helpline is available 24 hours a day, 365 days per year. Free, confidential help is available in 40 different languages. Free face-to-face counselling is also available, and specialist counselling is available for Māori, Pasifika and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).

Existing Gaming Machine Safeguards

25. Adopting a more restrictive policy is not necessary given the significant measures that are already in place to minimise the harm from gaming machines.

26. Gamblers are now only permitted to make one cash withdrawal per day. If a second cash withdrawal is made, the venue staff are required to talk to the player about their gambling and complete a two-page report about the person's gambling. That report must then be reviewed by the venue manager within seven days.

27. ATMs are excluded from all gaming rooms. ATMs at gaming venues must be in direct line of sight from

the main bar area or main customer service area.

28. Gaming machines cannot be visible from outside the venue.

29. Venue staff are required to undertake three formal sweeps of the gaming room per hour and keep a detailed record of each sweep.

30. Limits exist on the type of venues that can host gaming machines. The primary activity of all gaming venues must be focused on persons over 18 years of age. For example, it is prohibited to have gaming machines in venues such as sports stadiums, internet cafes, and cinemas.

31. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.

32. There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won. 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.
33. All gaming machines in New Zealand 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. A message is then displayed
asking the player whether they wish to continue with their session or collect their credits.

34. Gaming machines in New Zealand do not accept banknotes above $20.00 in denomination.

35. All gaming venues have a harm minimisation policy.

36. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.

37. All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.

38. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.
39. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.

40. It is not permissible for a player to play two gaming machines at once.

41. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.

42. The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).

43. It is not permissible to use the word "jackpot" or any similar word in advertising that is visible from outside a venue.

The Current Policy Settings are Reasonable

44. The current policy settings are reasonable given the current environment of high regulation and the expansion of online gambling.

45. There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last 15 years, the problem gambling rate has remained static, despite gaming machine numbers declining by over 25%.

46. The 2012 National Gambling Survey[8] concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report stated on pages 17 and 18:

> Problem gambling and related harms probably reduced significantly during the 1990s but have since remained at about the same level despite reductions in non-casino EGM numbers and the expansion of regulatory, public health and treatment measures. Given that gambling availability expanded markedly since 1987 and official expenditure continued to increase until 2004, these findings are consistent with the adaptation hypothesis. This hypothesis proposes that while gambling problems increase when high risk forms of gambling are first introduced and made widely available, over time individual and environmental adaptations occur that lead to problem reduction.

47. The New Zealand National Gambling Study: Wave 3 (2014)[9] noted that the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing. The report stated on page 19:

> In contrast to the 1990s, there is no evidence that problem gambling prevalence decreased with decreasing participation rates during the 2000s. When methodological differences between studies are taken into account, it appears that problem gambling prevalence has remained much the same during the past 10 to 15 years.
> …gambling participation has decreased substantially in New Zealand during the past 20 years, and problem gambling and related harm has probably plateaued…

48. Professor Max Abbott is New Zealand's leading expert on problem gambling. In 2006, Professor Abbott published a paper titled *Do EGMs and Problem Gambling Go Together Like a Horse and Carriage?* The paper noted that gaming machine reductions and the introduction of caps generally appear to have little impact on problem gambling rates. Professor Abbott noted:

EGM reductions and the introduction of caps generally appear 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).

49. There is no direct correlation between gaming machine spend and problem gambling presentations.

50. Adopting a more restrictive policy is unlikely to reduce problem gambling, but will, over time, reduce the amount of funding available to community groups based in the South Taranaki District. Reducing gaming machine venues reduces casual and recreational play, and therefore reduces machine turnover and the amount of money generated for grant distribution. However, 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 that has gaming machines, or worse, may move to another form of gambling such as offshore-based internet and mobile phone gambling.

Unintended Consequences – Increase in Internet and Mobile Phone Gambling

51. Any reduction in the local gaming machine offering may have unintended consequences, as this may simply lead to a migration of the gambling spend to offshore internet- and mobile-based offerings. While it is illegal to advertise overseas gambling in New Zealand, it is not illegal to participate in gambling on an overseas-based website or mobile phone application.
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> Our data also suggest that these individuals may have 'switched' their gambling activity from venue-based gambling (e.g. EGM gambling) to activities that are readily available online in Australia, such as betting on sports and racing. This may reflect [an] increase in overall online gambling participation that has been observed prior to COVID-19.

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Attached Documents

Name
GMANZ Submission to South Taranaki District Council

The Gaming Machine Association of New Zealand's Submission on South Taranaki District Council's Gambling Venue Policy

5

Introduction

1. The Gaming Machine Association of New Zealand ("the Association") represents the vast majority of the gaming machine societies that operate in New Zealand. The Association wishes to provide South Taranaki District Council with pertinent information regarding gaming machine gambling to help council to make a balanced, evidence-based decision.

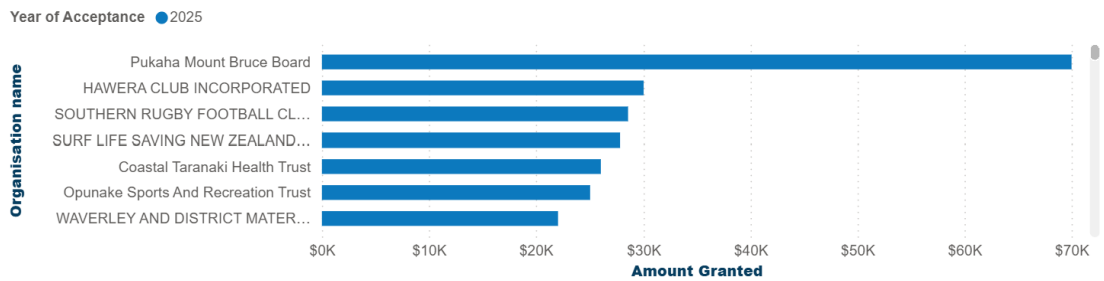
Summary

2. The Association supports option 1:

- Retention of the current cap of 121 machines (a cap at current numbers).
- Retention of the relocation provision.

Local Data and Information

3. The amount of gaming machine grants made to South Taranaki District-based organisations is posted on the granted.govt.nz website. In 2025, grants totalling **$765,497** were made to the South Taranaki District:



4. In addition to the external grants, club venues use the proceeds from the machines to support their members and their club facilities. Two of the 10 venues that operate gaming machines in the South Taranaki District are club venues, the South Taranaki Club Inc and Masse.

5. Problem gambling presentations from persons based in the South Taranaki District are extremely low. The Ministry of Health keeps a record of the number of people in each territorial authority who seek help via the phone, text, email or face-to-face counselling

services that are available. The South Taranaki District presentation data[1] (Table 10 – excludes brief interventions) are as follows:

2022/23	new clients 0	total clients seen 3
2021/22	new clients 1	total clients seen 1

Relocation Policy

6. The status quo relocation policy is sensible and should be retained.

7. In September 2013, Parliament recognised the merit in enabling venues to relocate, and expressly amended the Gambling Act 2003 to enable venues to relocate and retain the same number of machines when a relocation consent was obtained.

8. Venue relocation is a harm minimisation tool.

9. It is good that the current policy enables venues to relocate out of a high deprivation area to a lower deprivation area. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in high deprivation locations.

10. It is good that the current policy enables venues to relocate out of a suburban/residential area to a more suitable area, such as a central business district. There is no good policy reason for taking steps to restrict this option. Restricting the option to relocate simply entrenches venues in undesirable residential locations.

11. It is good that the current policy supports businesses that wish to move to new, modern, refurbished premises. Allowing local businesses to upgrade their premises and provide a more modern, attractive offering to the public helps to revitalise business districts, improves the local economy and encourages tourism.

12. The first venue to relocate under the amendments made to the Gambling Act 2003 was the Te Rapa Tavern in Hamilton. The photos below show the old, rundown premises and the new modern premises. The redevelopment cost $3,000,000.

[1] https://www.health.govt.nz/statistics-research/statistics-and-data-sets/problem-gambling/gambling-harm-services-data#toc-0-1



The old Te Rapa Tavern



The new Te Rapa Tavern

13. It is good that the current policy enables venues to move to smaller, more suitable premises. Enabling venues to move away from large premises, with large car parking areas, to newer, smaller premises also has the advantage of freeing up large areas of land, which may be better used for affordable high-density housing.

14. It is good that the current policy enables venues to move out of earthquake-prone buildings to stronger, more modern buildings. This is a health and safety issue.

15. It is also reasonable to allow venues to relocate when the move is due to onerous rental sums or lease terms being imposed. Currently, once a venue has obtained a licence to host gaming machines its value is artificially increased. This often leads to landlords demanding higher than normal rentals. Allowing more flexible relocation prevents landlords demanding unreasonable rentals as it gives the venue operator the ability to relocate to an alternative venue.

<u>Benefits from Gaming Machines - Gambling is an Enjoyable Activity</u>

16. Gambling is a popular form of entertainment that most New Zealanders participate in. The 2025 New Zealand Gambling Survey[2] found that 64.1% of adult New Zealanders had participated in some form of gambling in the previous 12 months (estimated to be 2,760,000 New Zealanders aged 15 and over).



2 https://kupe.healthpromotion.govt.nz/nzgs/participation-frequency-and-expenditure/any-gambling/any-gambling-activity/

17. The majority of people who gamble do so because they find it an enjoyable activity. This was observed by Suits (1979, p. 155)[3], who stated:

> Gambling is a recreational activity or a kind of participation sport from which the principal satisfaction derives from the activity itself and from the ebb and flow of wins and losses rather than from ultimate outcome - the net amount won or lost. For most gamblers, the purpose of gambling is not to get rich, but to "have fun," to experience "excitement," or to have "something to look forward to," and they view payment for this recreation in the same light as others look on outlays for theatre tickets, vacation trips, or a night on the town.

18. Gambling for the non-addicted gambler may be an avenue for socialising, stress relief and a way of having fun. Contrary to how it may appear from a non-gambler's perspective, gamblers do not necessarily anticipate they will make money from gambling. Parke (2015)[4] stated:

> Players mostly realise that they are paying for a leisure experience. They are not expecting to be paid, except for a small minority, who are going to earn an income as a professional gambler.

<u>Benefits from Gaming Machines - Positive Wellbeing Impact from Gambling in New Zealand</u>

19. The 2021 TDB Advisory report, Gambling in New Zealand: A National Wellbeing Analysis[5], found that gambling in New Zealand had a net positive wellbeing benefit totalling around $1.74b to $2.16b per annum.



3 Suits, D. (1979). The Elasticity of Demand for Gambling. The Quarterly Journal of Economics, 93(1), 155–162.

4 Parke, J. (2015). Gambling, leisure and pleasure: Exploring psychosocial need satisfaction in gambling. Presentation at the KPMG eGaming summit. https://assets.kpmg/content/dam/kpmg/pdf/2016/07/im-esummit-report-2015.pdf.

5 https://www.gamblinglaw.co.nz/download/Gambling_in_New_Zealand.pdf

Revenue Breakdown

20. The return to players on a non-casino gaming machine is required to be set between 78% and 92%, with most being set at 91.5%. On average, for every $1.00 gambled, 91.5 cents are returned to the player in winnings. The money retained is typically allocated as follows:

Typical Distribution of Gaming Machine Profits

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	1.08%	1.23%
DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.53%	43.16%

Gaming Machines – Key Facts

21. Gaming machines have been present in New Zealand communities since the early 1980s. Initially the machines were operated without a gaming licence. The first gaming licence was issued to Pub Charity on 25 March 1988, over 38 years ago.

22. New Zealand has a very low problem gambling rate by international standards. The March 2025 New Zealand National Gambling Survey[6] found that the combined rate of moderate-risk gambling and problem gambling was 2.4% of the adult population (aged 15+). This equates to approximately 104,000 adults. A subsequent OIA request[7] revealed that this was comprised of 0.5% problem gambling and 1.9% moderate risk gambling. The problem gambling rate is for all forms of gambling, not just gaming machine gambling.

23. All gaming machine societies contribute to a problem gambling fund. This fund provides over $25 million per annum to the Ministry of Health to support and treat gambling addiction and to increase public awareness. The funding is ring-fenced and not able to be redirected to other health areas.

24. An excellent, well-funded problem gambling treatment service exists. The problem gambling helpline is available 24 hours a day, 365 days per year. Free, confidential help is available in 40 different languages. Free face-to-face counselling is also available, and specialist counselling is available for Māori, Pasifika and Asian clients. An anonymous, free text service (8006) is available. Support via email is also available (help@pgfnz.org.nz).

6 https://kupe.healthpromotion.govt.nz/nzgs/gambling-harm/problem-gambling-severity-index/

7 https://www.gamblinglaw.co.nz/download/OIA_Problem_Gambling_Rate_March_2025.pdf

Existing Gaming Machine Safeguards

25. Adopting a more restrictive policy is not necessary given the significant measures that are already in place to minimise the harm from gaming machines.

26. Gamblers are now only permitted to make one cash withdrawal per day. If a second cash withdrawal is made, the venue staff are required to talk to the player about their gambling and complete a two-page report about the person's gambling. That report must then be reviewed by the venue manager within seven days.

27. ATMs are excluded from all gaming rooms. ATMs at gaming venues must be in direct line of sight from the main bar area or main customer service area.

28. Gaming machines cannot be visible from outside the venue.

29. Venue staff are required to undertake three formal sweeps of the gaming room per hour and keep a detailed record of each sweep.

30. Limits exist on the type of venues that can host gaming machines. The primary activity of all gaming venues must be focused on persons over 18 years of age. For example, it is prohibited to have gaming machines in venues such as sports stadiums, internet cafes, and cinemas.

31. There is a statutory age limit that prohibits persons under 18 years of age playing a gaming machine.

32. There are very restrictive limits on the amount of money that can be staked and the amount of prize money that can be won. 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.

33. All gaming machines in New Zealand 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. A message is then displayed asking the player whether they wish to continue with their session or collect their credits.

34. Gaming machines in New Zealand do not accept banknotes above $20.00 in denomination.

35. All gaming venues have a harm minimisation policy.

36. All gaming venues have pamphlets that provide information about the characteristics of problem gambling and how to seek advice for problem gambling.

37. All gaming venues have signage that encourages players to gamble only at levels they can afford. The signage also details how to seek assistance for problem gambling.

38. All gaming venue staff are required to have undertaken comprehensive problem gambling awareness and intervention training.

39. Any person who advises that they have a problem with their gambling is required to be excluded from the venue.

40. It is not permissible for a player to play two gaming machines at once.

41. All gaming machines have a clock on the main screen. All gaming machines display the odds of winning.

42. The design of a gaming machine is highly regulated and controlled. For example, a gaming machine is not permitted to generate a result that indicates a near win (for example, if five symbols are required for a win, the machine is not permitted to intentionally generate four symbols in a row).

43. It is not permissible to use the word "jackpot" or any similar word in advertising that is visible from outside a venue.

The Current Policy Settings are Reasonable

44. The current policy settings are reasonable given the current environment of high regulation and the expansion of online gambling.

45. There is no direct correlation between gaming machine numbers and problem gambling rates. Over the last 15 years, the problem gambling rate has remained static, despite gaming machine numbers declining by over 25%.

46. The 2012 National Gambling Survey[8] concluded that the prevalence of problematic gambling reduced significantly during the 1990s and has since stayed about the same. The report stated on pages 17 and 18:

> Problem gambling and related harms probably reduced significantly during the 1990s but have since remained at about the same level despite reductions in non-casino EGM numbers and the expansion of regulatory, public health and treatment measures. Given that gambling availability expanded markedly since 1987 and official expenditure continued to increase until 2004, these findings are consistent with the adaptation hypothesis. This hypothesis proposes that while gambling problems increase when high risk forms of gambling are first introduced and made widely available, over time individual and environmental adaptations occur that lead to problem reduction.

47. The New Zealand National Gambling Study: Wave 3 (2014)[9] noted that the problem gambling rate had remained the same over the last 10-15 years despite gaming machine numbers decreasing. The report stated on page 19:

> In contrast to the 1990s, there is no evidence that problem gambling prevalence decreased with decreasing participation rates during the 2000s. When methodological differences between studies are taken into account, it appears

8 https://www.gamblinglaw.co.nz/download/national-gambling-study-report-2.pdf

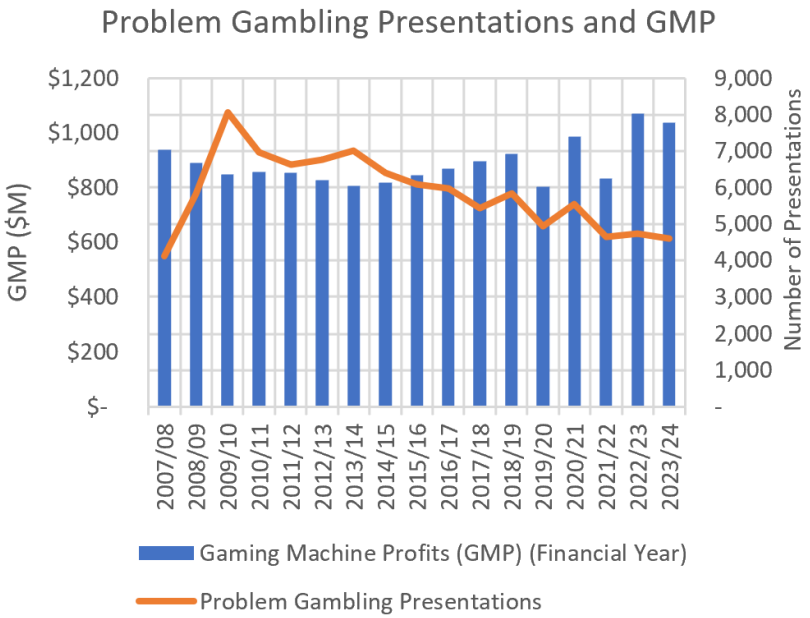
9 https://www.gamblinglaw.co.nz/download/NZ_National_Gambling_Study_Wave4_2015.pdf

> that problem gambling prevalence has remained much the same during the past 10 to 15 years.
>
> …gambling participation has decreased substantially in New Zealand during the past 20 years, and problem gambling and related harm has probably plateaued…

48. Professor Max Abbott is New Zealand's leading expert on problem gambling. In 2006, Professor Abbott published a paper titled *Do EGMs and Problem Gambling Go Together Like a Horse and Carriage?* The paper noted that gaming machine reductions and the introduction of caps generally appear to have little impact on problem gambling rates. Professor Abbott noted:

> EGM reductions and the introduction of caps generally appear 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).
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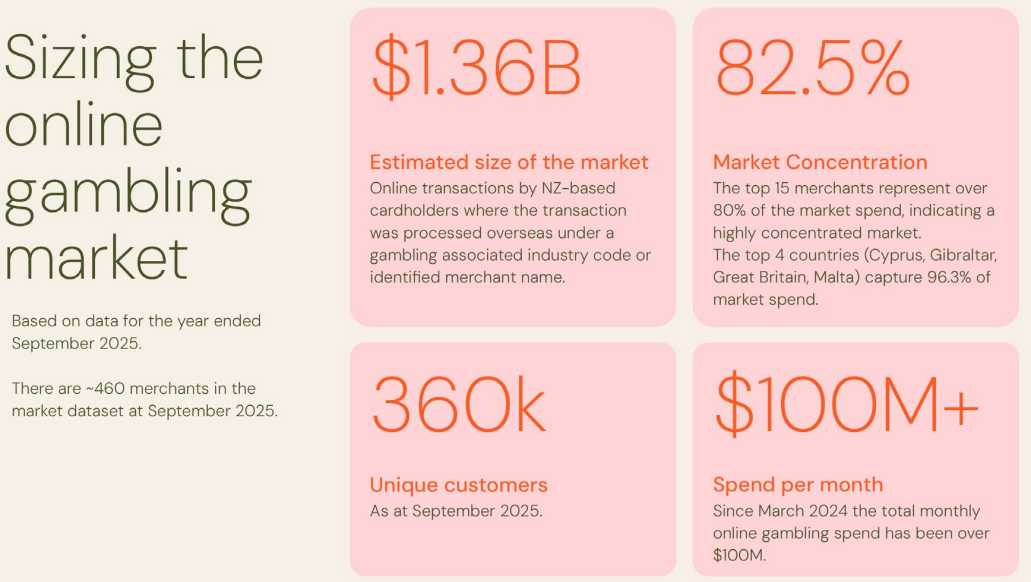
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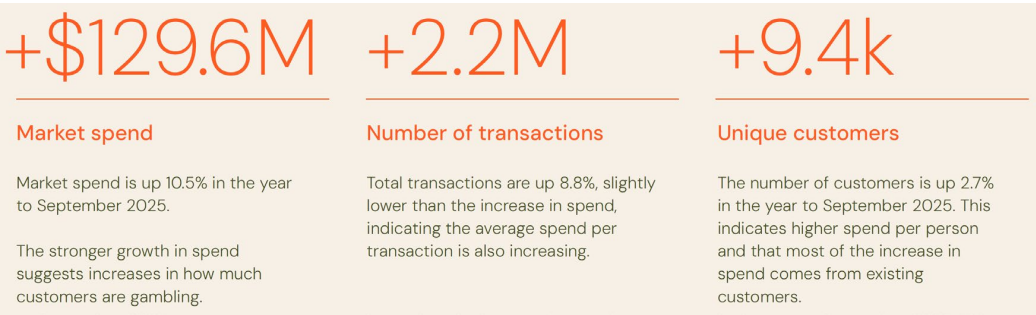


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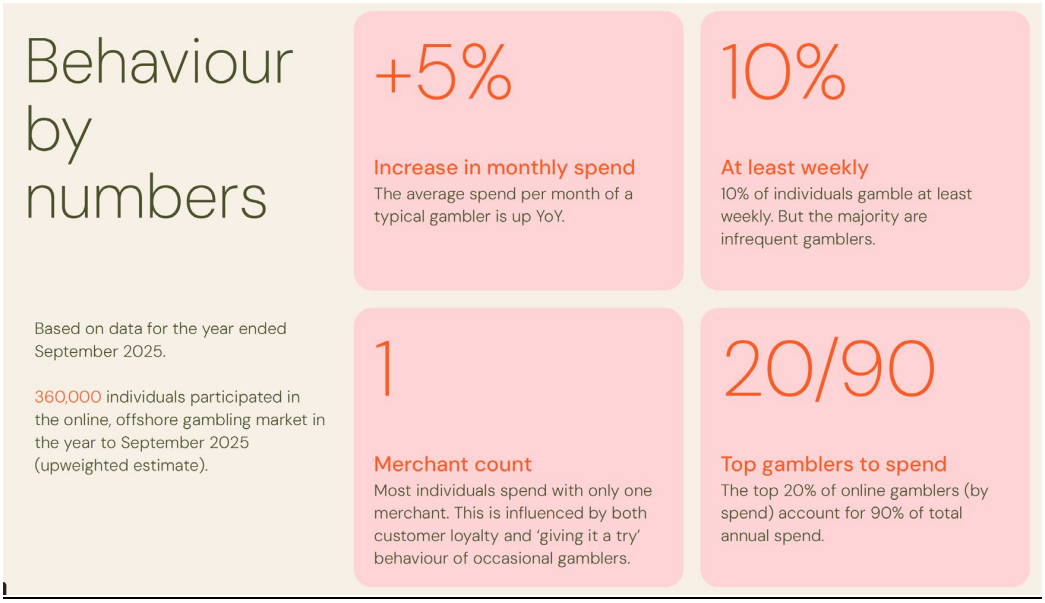
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14 https://www.gamblinglaw.co.nz/download/Gambling_in_Australia_2024_002.pdf

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Oral Hearing

65. Jarrod True, on behalf of the Gaming Machine Association of New Zealand, would like to make a presentation at the upcoming oral hearing.

22 September 2026

Jarrod True
Counsel
Gaming Machine Association of New Zealand
[redacted]
[redacted]

BROOKFIELDS
LAWYERS

15 March 2021

By Email: [redacted]

Gaming Machine Association of New Zealand
c/o Peter Dengate-Thrush
Independent Chair

ATTENTION: Peter-Dengate Thrush

GAMBLING VENUE POLICY - CONFLICT OF INTEREST

We refer to your email instructions of 26 February 2021, seeking our advice regarding councillor conflicts of interest with respect to decision-making on Council's gambling venue policy.

YOUR QUESTIONS

1. You have asked us to advise whether:

   a. Membership of a club or organisation that receives gaming machine grant funding would constitute a conflict of interest that would require the councillor to withdraw from decision-making or discussion regarding a proposed gambling venue policy; and

   b. If Council has itself received gambling grant funding, does this impact on its ability to decide on a gambling venue policy, such that the decision should be made by an independent commissioner?

EXECUTIVE SUMMARY

1. In summary:

   a. If an elected member has a financial interest in a club or organisation that may be impacted by the gambling venue policy, the member must not participate in any discussion or decision-making on the policy. It would be rare for a financial interest to arise in this context, but examples may be where the elected member is in a paid role at a club or organisation, and the role is funded from a gaming grant. A more remote interest may arise where the quantum of membership fees paid to a club or organisation may be impacted by a gaming grant. In those circumstances,

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Tel: +64 9 379 9350 Fax: +64 9 379 3224 DX CP24134 www.brookfields.nz

it may be prudent to seek a decision from the Auditor-General as to whether the potential interest is deemed too remote to influence decision-making.

b. Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to a conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role (e.g. a coach who is paid for that service).

c. Being a member or a club or organisation that operates a gaming licence will give rise to a conflict of interest, particularly where the elected member serves in an executive role at the club or organisation.

d. Where an elected member, outside of a debate on the issue, had expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

2. The fact that Council may have previously been the recipient of gaming grant money would not create a conflict of interest when deciding its gambling venue policy. Such democratic decision-making is fundamental to its role and is distinguishable from regulatory or quasi-judicial decision-making where appointment of an independent commissioner may be appropriate to avoid any appearance of bias. The decision-making processes in the Local Government Act 2002 (**LGA**) already impose important requirements to ensure that such decision-making involves consideration of broader community views and not just the interests of Council as an organisation. It would therefore be unnecessary and inappropriate to appoint an independent commissioner because Council initiatives may have previously benefited from gaming grants.

ANALYSIS

3. Under section 101 of the Gambling Act 2003 (**GA**), territorial authorities must, using the special consultative procedure in section 83 of the LGA, adopt a policy that specifies whether class 4 venues may be established in the district, and if so, where they may be located (**the policy**). The policy may also specify any restrictions on the maximum number of gaming machines that may be operated at a class 4 venue and may include a relocation policy.

Does membership of an organisation or club create a conflict of interest for participation in discussion or decision-making on gambling venue policies?

4. It is not uncommon for councillors to be members of organisations and clubs, some of which may receive grant funding from gaming machines. This raises the question of whether membership of such a club or organisation would constitute a conflict of interest that would prevent the councillor from participating in discussion or decision-making regarding the policy.

5. Broadly speaking, a conflict of interest occurs when an elected member is affected by some other interest that he or she has in their private life. There are different types of conflict of interest:

a. Financial conflicts of interest – where the member (or their spouse or partner) has a direct or indirect financial interest in a particular decision, they cannot discuss or vote on the matter.[1]

b. Non-financial conflicts of interest.

Financial conflicts of interest

6. The applicable legislation is the Local Authorities (Members' Interests) Act 1968 (**LAMIA**). While the LAMIA does not define what a financial interest is, section 6(2) outlines a number of examples where a member will be deemed to have a financial interest:

- The member, or his or her spouse, owns 10% or more of the issued capital of an incorporated company or any company controlling that company, that has a pecuniary interest (direct or indirect) in a matter before the local authority or committee; or
- The member, or his or her spouse, is a member of the company and either of them is the managing director or the general manager of the company; or
- The member, or his or her spouse, is a member of a company controlling the company having a pecuniary interest in the matter before the local authority or committee, and either the member, or his or her spouse, is the managing director or the general manager; or
- The member, or his or her spouse, is the managing director or general manager of the company, and either of them is a member of a company controlling that company.

7. Other than these examples, the LAMIA does not define what a "financial interest" is. However, the Auditor-General has described a "financial interest" as "a reasonable expectation of financial loss or gain from the particular decision".[2]

8. It is unlikely that membership alone of a community organisation that receives gaming grant funding would give rise to a financial interest. This is because such organisations and clubs are usually run on a not-for-profit basis. One example where a financial interest could potentially arise would be if the member were in a paid position at the club or organisation, and the funding for that position comes from gaming grants. Another example may be where there is a prospect that membership fees or subscriptions to a club could be affected by the amount of gaming grant funding. However, given that gambling venue policies are relatively high-level in nature and do not directly address matters such as the licensing of particular venues (which involve a separate decision-

[1] Section 6(1) of the Local Authorities (Members' Interests) Act 1968.
[2] Controller and Auditor-General, **Local Authorities (Members' Interests) Act 1968: A Guide for members of local authorities on managing financial conflicts of interest**, June 2020, at 4.15, referring to the definition of a financial interest in **Downward v Babington** [1975] VR 872.

making process, often by Council officers acting under delegated authority), or allocation of gaming grants (which are decided by the organisations that operate gaming licences subject to statutory requirements), any such potential impact is likely to be too speculative or remote to constitute a financial interest in the decision-making on a gambling venue policy.

9. Notwithstanding this view, where an elected member may receive a financial benefit of the kind described above from a club or organisation receiving gaming grant funding, they may as a matter of prudence wish to first obtain an exemption from the Auditor-General under section 6(3)(f) of the LAMIA (on the grounds that the financial interest is too remote or insignificant to be regarded as likely to influence him or her in voting or taking part in the discussion of the policy) before participating in discussion or decision-making on the policy. It is a relatively simple process to apply for such an exemption.

Non-financial conflicts of interest

10. A non-financial conflict of interest is any situation where a member is not affected financially by a decision but is affected in some other way that may constitute bias or the appearance of bias. Non-financial conflicts of interest are relevant to the avoidance of bias in decision-making. As opposed to financial interests, which can create personal liability for an elected member, bias is a matter of Council's accountability to the public. The avoidance of bias is part of the administrative law principles of natural justice, which require the Council to act fairly in reaching its decisions. The fairness principle has been described in these terms:[3]

> In exercising that discretion, as in exercising any other administrative function, they [members] owe a constitutional duty to perform it fairly and honestly … What is a fair procedure to be adopted at a particular enquiry will depend upon the nature of its subject matter.

11. The test for whether an interest may give rise to an apparent bias has been stated by the Court of Appeal as being where circumstances:[4]

> …might lead a fair-minded lay observer to reasonably apprehend that the judge might not bring an impartial mind to the resolution of the instant case.

12. Unlike a financial conflict of interest, a potential non-financial conflict does not automatically exclude a member from participating in a decision. It will depend on how serious the conflict is. The Auditor-General has suggested a number of factors that may be relevant to an assessment of whether a potential conflict is serious enough to exclude a member from participation in decision-making. They include:[5]

    - The type or size of the person's other interest;
    - The nature or significance of the particular decision or activity being carried out by the public organisation;
    - The extent to which the person's other interest could specifically affect, or be affected by, the public organisation's decision or activity; and

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[3] **Bushell v Secretary of State for the Environment** [1981] AC 75, 95.
[4] **Muir v Commissioner of Inland Revenue** [2007] 3 NZLR 495.
[5] Controller and Auditor-General, **Managing conflicts of interest: A guide for the public sector**, June 2020, at 4.31.

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- The nature or extent of the person's current or intended involvement in the public organisation's decision or activity.

13. In our view, in the context of decision-making on a gambling venue policy, the mere fact that an elected member is also a lay member of an organisation or club that receives gaming grant funding is unlikely to give rise to a conflict of interest. This is because of the level of remoteness from any possible benefit or loss associated with the decision-making. In most cases, the contents of a gambling venue policy will not directly impact on funding that has or may be received by a club or organisation from gaming machine grants. The purpose of the policy is to specify whether class 4 venues may be established, and if so their location. It can also specify restrictions on the number of gaming machines that may operate at a class 4 venue. Such matters do not necessarily impact directly on whether a club or organisation may receive gaming grant funding, and if so, the amount of any such grant. Funding decisions are made by the organisations who operate the gaming machines, not the Council. The fact that a member, by virtue of membership of a club or organisation that has received gaming grants, has knowledge or experience of the beneficial impacts that gaming grants can have on the community does not give rise to a conflict of interest. To the contrary, it may contribute to a fair and balanced consideration of the issues arising when making decisions on a gambling venue policy. This would be consistent with the purpose of the of the GA, which is *inter alia* to ensure that money from gambling benefits the community and to facilitate community involvement in decisions about the provision of gambling.[6]

14. It is important to distinguish between membership of a club or organisation that receives gaming grants, and membership of a club or organisation that holds a gaming licence. In our view, while the former would not give rise to a conflict of interest in decision-making on a gambling venue policy, there is a much greater likelihood that the latter could give rise to a conflict of interest. This is particularly the case if the elected member holds an executive role in the club or organisation that operates a gaming licence. This is because, while a gambling venue policy does not specify whether or not a particular club or organisation is able to obtain a gaming licence *per se*, the policy may affect the eligibility of a club or organisation to hold a licence. As such, participation in the discussion or decision-making by a member of any such club or organisation could create an appearance of bias and therefore a conflict of interest.

15. Elected members should also always be mindful of avoiding predetermination, i.e., approaching decision-making with a closed mind. Elected members are entitled (and expected) to bring their previous knowledge and experiences to decision-making, but to approach any decision with an open mind. This means that elected members should be cautious about being vocal, other than in the course of Council debates, about particular views in a manner that may suggest that they do not and cannot have an open mind on a particular matter. This is because a conflict of interest may arise as a result of possible predetermination (i.e. actual or perceived bias).

16. In summary:

[6] Section 3 of the GA.

a. If an elected member has a financial interest in a club or organisation that may be impacted by the gambling venue policy, the member must not participate in any discussion or decision-making on the policy. It would be rare for a financial interest to arise in this context, but examples may be where the elected member is in a paid role at a club or organisation, and the role is funded from a gaming grant. A more remote interest may arise where the quantum of fees paid to a club or organisation may be impacted by a gaming grant. In those circumstances, it may be prudent to seek a decision from the Auditor-General as to whether the potential interest is deemed to remote to influence decision-making.

b. Being a member of a club or organisation that receives funding from a gaming grant will not usually give rise to a conflict of interest when it comes to deciding or discussing Council's gaming venue policy.

c. Being a member or a club or organisation that operates a gaming licence will give rise to a conflict of interest, particularly where the elected member serves in an executive role at the club or organisation.

d. Where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

Would Council be conflicted in deciding a gambling venue policy because it has previously received gaming grants?

17. Council initiatives will frequently fall within the second category of the definition of an "authorised purpose" for which gaming proceeds may be used, as set out in section 4 of the GA i.e., "a non-commercial purpose that is beneficial to the whole or a section of the community". Notwithstanding the eligibility for Council initiatives to receive gaming grants, Parliament conferred territorial authorities with the responsibility of formulating a gaming venue policy for their districts. We do not consider that any conflict of interest would arise in relation to decision-making on a gambling venue policy because the Council may have previously been awarded gaming grants. This is because:

    a. While individual elected members are subject to the LAMIA which prevents them from participating in decision-making where they have a financial interest, Council as an entity is not subject to the LAMIA.

    b. Caselaw recognises the inevitability of a degree of conflict within councils when exercising certain statutory functions. It is established, for example, that a council may object to its own district plan, prosecute itself, and apply to itself for a resource consent.

    c. The standard of impartiality for a Council is that it must approach its duty of inquiring into submissions with an open mind.[7] Given the requirement to undertake a special consultative process and the diverse views of individual members, it is unlikely that the fact that certain projects

[7] **Lower Hutt City Council v Bank** [1974] 1 NZLR 545 at 550.

undertaken by Council have benefited from gaming grants would unduly influence Council decision-making on its gambling venue policy. For the same reasons outlined above in relation to individual members, the connection between gaming grant money and decision-making on gambling venues is too remote to constitute a conflict of interest. In any event, compliance with the statutory rules in the LGA regarding decision-making by local authorities[8] and the general principles relating to local authorities[9] are intended to ensure that Council decision-making is open, transparent, and has regard to the diversity of community interests, notwithstanding the many facets and activities undertaken by Council.

18. We note that Council is not undertaking a quasi-judicial role when formulating a gambling venue policy. There is greater need to avoid the appearance of bias when it comes to regulatory or quasi-judicial decision making (such as considering a resource consent application). In those circumstances, where there is an apparent conflict in Council's interests, it is common for Council to delegate its decision-making to an independent commissioner. To that end, the Resource Management Act 1991 (**RMA**) specifically allows for the appointment of independent commissioners to decide consent applications. However, while Council may delegate its decision-making on a gambling venue policy to a particular committee or sub-committee of Council, it would be unnecessary (and in our view, inappropriate) to delegate such decision-making to an independent commissioner.

Yours faithfully
BROOKFIELDS

Linda O'Reilly

Linda O'Reilly
Partner

[redacted]

[8] Section 76 of the LGA.
[9] Section 14 of the LGA.

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Te Kaunihera ō Taranaki ki Te Tonga South Taranaki District Council

Review of Gambling Policies

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Submitter Details

Submission Date: 15/10/2026

First name: Mereana Last name: Graham

Organisation:

The Problem Gambling Foundation Ltd

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 the status quo Preferred option.	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
Option 2	The establishment and relocation of venues and the maximum number of machines per venue remain unchanged but a 'sinking lid' policy for the total number of gaming machines would be applied over part or all of the District. A 'sinking lid' policy means if an existing venue is disestablished or stopped having gaming machines, a new venue would not be allowed to take on those machines. As a result, the number of gaming machines in the District would reduce over time.
Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 3 - I prefer that there should be no restrictions on the numbers of Class 4 gambling venues or machines throughout the South Taranaki District.

TAB Venues Policy

Option 1 the status quo Preferred option.	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.

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Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

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Attached Documents

Name
South Taranaki City Council Gambling Venues Policy Review

South Taranaki City Council Gambling Venues Policy Review:

Policy Feedback

Introduction to The Problem Gambling Foundation Ltd

The Problem Gambling Foundation Ltd delivers gambling harm treatment and public health services nationwide. We provide free counselling, advice and support to gamblers and their families. Our organisation is a charitable trust operating nationally since 1988 with services delivered under contract to Te Whatu Ora and funded from the gambling levy.

As part of our public health work, we advocate for the development of public policy that contributes to the prevention and minimisation of gambling related harms. This includes working with Territorial Local Authorities (TLAs) to encourage the adoption of policies that address community concerns regarding the density and locality of gambling venues, and in this case, a sinking lid policy.

It is important to note that we are not an 'anti-gambling' organisation. We are, however, opposed to the harm caused by gambling and advocate strongly for better protections for those most at risk of experiencing gambling harm.

While most New Zealanders gamble without experiencing any apparent harm, a significant minority do experience harm from their gambling, including negative impacts on their own and the lives of others. It should also be noted that nearly 50% of all gambling harm is experienced by people who participate in low-risk gambling (harms include damage to relationships, emotional distress, financial impacts and disruptions to work or study). This suggests we need to focus on reducing gambling harm at the whole-of-population level.[1]

Class 4 Gambling

The harms associated with different forms of gambling are not equal, as reflected in the classifications outlined in the Gambling Act 2003. Class 4 gambling – electronic gaming machines (EGMs), commonly known as pokies, located in pubs, clubs, and TAB venues – is recognised as a high-risk, high-turnover form of gambling. It continues to be the most harmful form of gambling in New Zealand and remains the primary mode of gambling among people seeking support for gambling harm.[2]

Although pokies are a legal form of entertainment in New Zealand, they are highly addictive and intentionally designed to be immersive and encourage continuous play. The short time between placing a bet and learning the outcome, combined with the ability to play multiple games in rapid succession and immediately reinvest winnings, makes pokies one of the most addictive forms of gambling available.[3] People who regularly engage in continuous

[1] Ministry of Health. 2024. Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28: Proposals document. Wellington: Ministry of Health.
[2] Ministry of Health. Strategy to prevent and minimise gambling harm 2019/20 to 2021/22. Wellington: Ministry of Health; 2019.
[3] Schüll N.D. Addiction by design: Princeton University Press; 2012

forms of gambling are at significantly greater risk of experiencing gambling-related harm than infrequent gamblers.[4]

Research also suggests that more than half of pokie expenditure comes from people who are already at high risk of harm.[5] Living near pokie venues is a strong predictor of ongoing gambling harm and relapse among those already experiencing gambling-related challenges. Additionally, pokie machine use is a significant predictor of people progressing into higher-risk gambling behaviour.[6]

South Taranaki and Class 4 Gambling

As of June 2026, there were 10 Class 4 gambling venues and 121 pokies in South Taranaki.

While nationally there is a trend of long-term general growth in annual gaming machine profit (GMP), South Taranaki has trended downwards in 2022-2024 after peaking in 2021, however has had a slight increase in 2025 where there was approximately $6.3 million lost. This was a 5.4% increase or $324,892.28 increase.

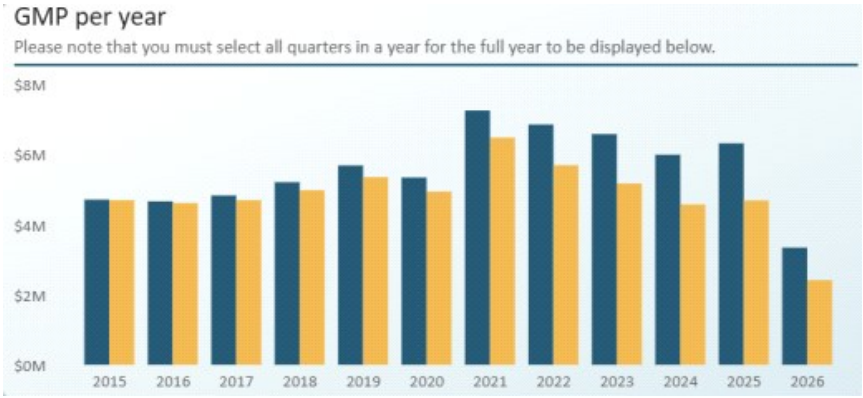


Figure 1: South Taranaki GMP from 2015 to 2026 (DIA,2025) Blue columns represent Nominal figures, Yellow columns represent Inflation Adjusted figures

[4] Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2016). New Zealand National Gambling Study: Wave 3 (2014). Report number 5. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.
[5] Erwin C, Lees, K., Pacheco, G., & Turco, A. *Capping problem gambling in NZ: The effectiveness of local government policy interventions.* Auckland: New Zealand Work Research Institute.; 2020.
[6] Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2016). New Zealand National Gambling Study: Wave 3 (2014). Report number 5. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.

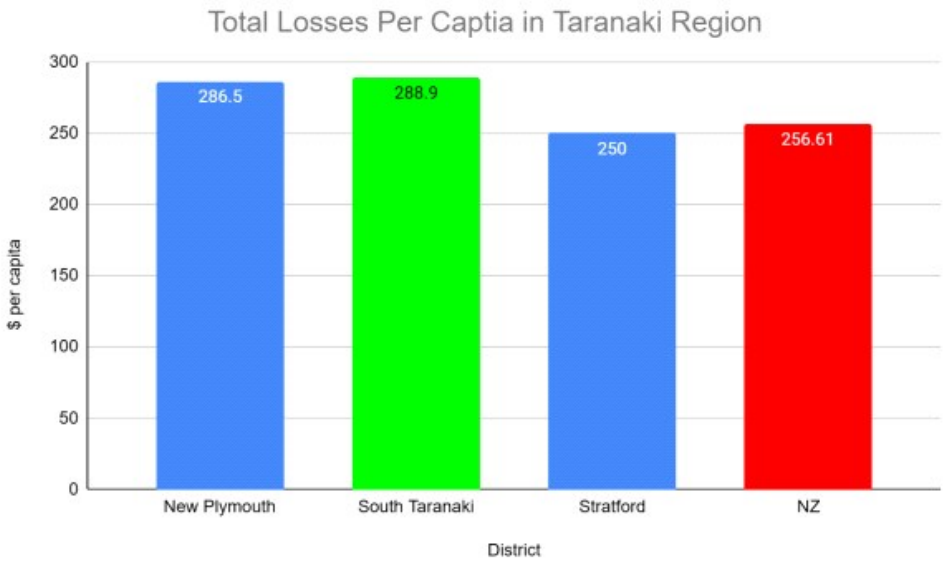


Figure 2: Pokie Losses Per Capita vs Percentage of Pokie Venues in Higher Deprivation Areas in Bay of Plenty (2025) (DIA, 2026; Statistics NZ, 2026) Note: Data on the adult population for each TLA was retrieved from Statistics New Zealand 's 2023 Census. Age ranges are in 5-year groupings so the data for 18- and 19-year-olds could not be differentiated.

New Plymouth has the largest population in Taranaki region with an estimated population of 90,100, followed by South Taranaki, with an estimated population of 29,800. Despite the big population difference, South Taranaki recorded a higher spend per capita, at $288.90 per adult (20 years and over)

New Plymouth is the largest population centre in Taranaki region with an estimate population of 90,100, while South Taranaki follows behind as the second largest population. South Taranaki also has the highest number of pokie venues located in medium-high to high deprivation areas within the region.[7]

Impact of Gambling Harm on the Community

As the only current provider of mainstream services dedicated to the prevention and minimisation of gambling harm in Aotearoa New Zealand, we have first-hand experience supporting gamblers and affected others to navigate the significant impacts harmful gambling can have on their lives.

It is estimated that around one in five people (22%) in New Zealand will experience harm during their lifetime because of either their own or someone else's gambling. The 2023/24 New Zealand Gambling Survey found that 8.3% of New Zealanders experienced gambling-related harm within the previous 12 months.[8] Based on South Taranaki's population, this equates to an estimated 2,400 people experiencing gambling harm in 2025.

[7] Department of Internal Affairs. *Gaming machine profits (GMP Dashboard)*. Wellington: Department of Internal Affairs; 2026. Retrieved from: https://www.dia.govt.nz/gambling-statistics-gmp-dashboard

The impacts of harmful gambling are wide-ranging and can affect multiple areas of health and wellbeing, including financial hardship, relationship breakdown, psychological distress, physical health impacts, cultural harm, reduced participation in work or study, and involvement in criminal activity. [9]

Client Assistance data covering the period since the last review of the South Taranaki policy was not available at the time of writing. The most recent available data for South Taranaki, covering the 2020/21 to 2022/23 financial years, are outlined below. [10]

Financial Year	Total clients assisted
July 2022 - June 2023	3
July 2021 - June 2022	1
July 2020 - June 2021	5

It is important to note that the Ministry of Health's Strategy to Prevent and Minimise Gambling Harm states that "needs assessment and outcomes monitoring reports show that only 16% of potential clients for gambling support services (that is, people whose reported harm results in a moderate to high PGSI score) actually access or present at these services". The Strategy also notes that similarly low levels of service utilisation are seen across other forms of addiction support.[11]

While Ministry of Health client intervention data is not an accurate measure of the overall prevalence of gambling harm in New Zealand, it does provide insight into the relative level of harm associated with different forms of gambling among those seeking support. More than half of people accessing gambling harm support services identify Class 4 pokies as the primary form of gambling causing them harm. Given that almost half of all clients in 2022/23 sought support due to pokie gambling, this highlights the significant level of harm these machines continue to cause within communities.

Furthermore, gambling harm disproportionately affects Māori and Pacific peoples. The Ministry of Health's Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25 identifies these populations as carrying a burden of harm that significantly outweighs that experienced by other groups. Results from the 2020 Health and Lifestyles Survey found that Māori were 3.13 times more likely to be moderate-risk or high-risk gamblers than non-Māori and non-Pacific peoples, while Pacific peoples were 2.56 times more likely to fall into these risk categories.[12] According to the 2023 Census, Māori make up 28.91% of South Taranaki's population and Pasifika peoples 2.6%.[13] These communities also tend to be overrepresented in areas of higher deprivation, where there are often greater concentrations of pokie venues and machines.[14] Consideration must therefore be given to the inequitable impact of Class 4 gambling on these populations, and measures to address these harms should form part of any policy response.

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[8] Ministry of Health. 2025. Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Wellington: Ministry of Health.
[9] Ministry of Health. 2025. Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Wellington: Ministry of Health.
[10] Ministry of Health. Gambling harm intervention services data. Table 10: Clients Assisted, by Territorial Authority, for the 2004/05 to 2022/23 Financial Years (Ex Brief Intervention Type).
[11] Ministry of Health. Strategy to prevent and minimise gambling harm 2019/20 to 2021/22. Wellington; 2019.
[12] Te Hiringa Hauora. Results from the Health and Lifestyles Survey 2020. Wellington: Te Hiringa Hauora; 2021.
[13] Statistics New Zealand. *2023 Census place summaries - South Taranaki.* 2026. Retrieved from: South Taranaki District, Place and ethnic group summaries | Stats NZ

Sinking Lid Policy

From a public health perspective, there is a widely accepted understanding that the easier an addictive product is to access, the greater the likelihood that people will consume it. It follows those stronger restrictions on the number and location of addictive products, such as pokies, are an important component of a public health approach to preventing and minimising gambling harm. Councils therefore play a critical role in reducing gambling-related harm through the adoption of gambling venue policies that regulate the number and location of Class 4 gaming machines.

Sinking lid policies are unique to Aotearoa New Zealand and are designed to gradually reduce the maximum number of pokie machines by preventing the transfer of gaming licences to new venues.[15]

Research conducted by the New Zealand Work Research Institute at Auckland University of Technology found that sinking lid policies are among the most effective measures for reducing pokie expenditure, contributing to a 13% reduction in problem gambling expenditure. Furthermore, territorial local authorities (TLAs) that implemented restrictions beyond the minimum requirements of the Gambling Act 2003 experienced lower levels of gambling harm than TLAs that did not adopt additional restrictions.[16]

Class 4 Gambling Community Grants

Following the removal of tobacco funding, electronic gaming machines (EGMs) were introduced with the primary purpose of generating funding for communities. Class 4 trusts and societies are required to return at least 40% of gaming machine proceeds (GMP) to the community through grants or applied funding. This has created an inextricable link between gambling harm and the sustainability of community groups, sports organisations, and services. However, there is no guarantee that money lost to pokies within a district is returned to community groups in that same district. For example, of the $6.047 million lost on pokies in South Taranaki in 2025, approximately $765,000 was returned to organisations based in South Taranaki – around 12.7% of the total amount lost that year.[17]

While pokie grants may provide valuable support to local community groups, sports clubs, and services, it is important to consider where this funding originates, not only where it is distributed. Evidence consistently demonstrates that the distribution of Class 4 gambling funding is inequitable, with funds less likely to be returned to the communities in which they were generated. Ministry of Health reports indicate that pokie machines located in the most deprived communities account for more than half of all Class 4 gambling expenditure.[18] The Department of Internal Affairs (DIA) has also acknowledged that “this means that there is

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[14] Abbott, M., Bellringer, M., Garrett, N., & Mundy-McPherson, S. (2016). New Zealand National Gambling Study: Wave 3 (2014). Report number 5. Auckland: Auckland University of Technology, Gambling and Addictions Research Centre.
[15] Erwin C, Lees, K., Pacheco, G., & Turco, A. *Capping problem gambling in NZ: The effectiveness of local government policy interventions*. Auckland: New Zealand Work Research Institute.; 2020.
[16] Erwin C, Lees, K., Pacheco, G., & Turco, A. *Capping problem gambling in NZ: The effectiveness of local government policy interventions*. Auckland: New Zealand Work Research Institute.; 2020.
[17] Department of Internal Affairs. *Granted Dashboard - Grants by District*.Wellington: Department of Internal Affairs; 2024. Retrieved from: https://www.granted.govt.nz/dashboard.html

more exposure and access to pokie gambling, normalising gambling in communities who can least afford it and leading to gambling harm. "[19]

As of December 2025, approximately 70% of Class 4 venues in Aotearoa New Zealand were in medium-high or high deprivation areas, based on SA1 Deprivation Ratings. In South Taranaki, 100% of the district's 10 operating venues were in medium-high or high deprivation areas. This further emphasises the disproportionate harm happening in our higher deprivation communities.

A report commissioned by the DIA, *Assessment of the Effects of Class 4 Gambling on Wellbeing in New Zealand*, found that "one of the most striking features of this report is that [qualitative and quantitative analyses] both indicate that Class 4 gambling tends to magnify community disadvantage. The evidence strongly suggests that it transfers wealth from more deprived communities to less deprived communities."

Overall, there is a significant redistributive effect within the Class 4 funding system. Less deprived communities (deciles 1-5) contribute approximately 26% of gaming machine proceeds but receive 88% of grant funding. In contrast, more deprived communities (deciles 6-10) contribute 74% of gaming machine proceeds while receiving only 12% of grants. Funding communities through a system that relies heavily on lower-income households spending money they can ill afford on gaming machines raises serious ethical and equity

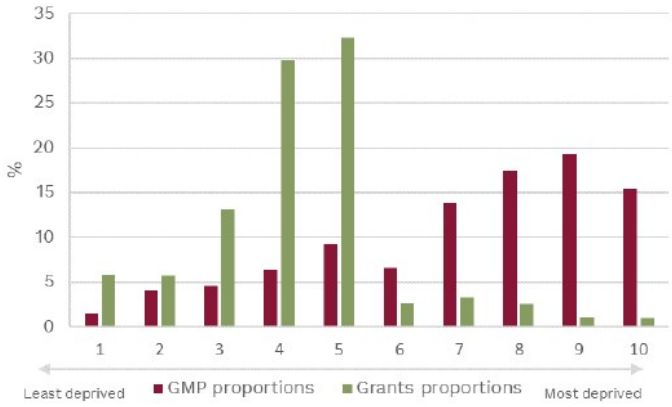


Figure 3: The origin of GMP and the destination of Class 4 grants by socio-economic decile

concerns.

Conclusion

South Taranaki District currently has a capped policy limit of 121 gaming machines that can operate in the district.

We commend South Taranaki District for undertaking a review of its gambling venue policy and for engaging with gambling harm organisations such as The Problem Gambling Foundation Ltd

[18] Allen & Clarke. Informing the 2015 gambling harm needs assessment: Final report for the Ministry of Health. Wellington: Ministry of Health; 2015.
[19] Department of Internal Affairs. Reducing pokies harm - Public discussion document. Wellington: Department of Internal Affairs; 2022.

Limited, alongside other community groups and services, to better understand the full spectrum of harm caused by pokies. South Taranaki District currently has a capped policy limit of 121 gaming machines that can operate in the district which it is currently at full capacity.

As part of this review process, we strongly encourage South Taranaki to adopt the sinking lid policy, with no merges or relocation and including the prohibition on new venues. We consider this to be the strongest evidence-based approach currently available in Aotearoa New Zealand for reducing pokie expenditure and minimising gambling-related harm.

Further strengthening the existing policy by removing the provisions that allow for venue relocations and venue mergers is likely to deliver additional positive outcomes over time. Such measures would further support the minimisation of gambling-related harm and demonstrate South Taranaki's ongoing commitment to the wellbeing of its communities.

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 16/10/2026

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Organisation: Mapu Maia Limited

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
Option 2	The establishment and relocation of venues and the maximum number of machines per venue remain unchanged but a 'sinking lid' policy for the total number of gaming machines would be applied over part or all of the District. A 'sinking lid' policy means if an existing venue is disestablished or stopped having gaming machines, a new venue would not be allowed to take on those machines. As a result, the number of gaming machines in the District would reduce over time.
Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

A sinking lid should be applied over:
All of District

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
	The Policy would be amended to allow one or more new stand-alone venues to be

46

Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be established in one or more parts of the District.

5

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Attached Documents

Name
Mapu Maia submission South Taranaki District Council Review of Gambling Policies

Mapu Maia submission

South Taranaki District Council Review of Gambling Policies

October 2026

Submitted by Mapu Maia Ltd via online form.

Contact: Michael Colhoun, Communications and Marketing Lead, Mapu Maia Ltd, [redacted]

South Taranaki District Council Review ofGambling Policies 2026

Summary

Mapu Maia was established to address gambling harm in Pasifika communities, recognising the need for culturally appropriate, stigma-reducing, and accessible services. Mapu Maia is New Zealand's only Pasifika-specific gambling harm service, offering free, culturally responsive counselling, education, and public health programmes to prevent and minimise gambling harm. Mapu Maia staff are prepared to present an oral submission, if required.

Mapu Maia's service delivery

Mapu Maia offers holistic, culturally responsive support for individuals, families, and communities affected by gambling harm. Services include free, professional, confidential Talatalanoa and at-home visits for individuals, couples, families, peer support, and clinical groups. Mapu Maia runs public health education via workshops, presentations, and community outreach to prevent gambling harm.

Class 4 Gambling Venues Policy

We support Option 2, introduction of a "sinking lid" policy should be applied.

Sinking lid policy evidence base

Evidence from New Zealand research demonstrates that sinking lid policies are effective at reducing gambling expenditure, gambling venue numbers, and "pokie" machine availability. Government commissioned research[1] has found sinking lid policies reduce expenditure by 13-14% compared to areas that do not apply this local restriction.

[1] Erwin, C., Lees, K., Pacheco, G. & Turcu, A. (2020) Capping gambling in NZ: The effectiveness of local government policy intervention. Auckland.

Mapu Maia

Email: help@mapumaia.nz
Phone: 0800 212 122

Mapu Maia Headquarter s: 15 Jack Conway Avenue, Manukau , 2241 / PO BOX 76174
North Shore Office: 1 Saint Leonards Road, Hauraki , Auckland, 0622
Hawkes Bay/Hasting s: 312 Saint Aubyn Street West, Hastings, 4130
Wellington Office: 19 Market Grove, Lower Hutt, 5010
Christchurch Office: 320 Cashel Street, Christchurch 8011

Gambling harm

Pacific people in New Zealand are identified in studies[2] as having the highest risk of developing gambling problems, with harms often amplified by cultural contexts such as collectivism, gift giving, fundraising, patriarchy, beliefs about blessings, and sports celebrities.

Pacific demographic in South Taranaki

In the 2023 Census[3], Pacific Peoples made up a small but notable share of South Taranaki's population, with Samoan and Cook Islands Māori being the largest groups.

Funding outcomes issues, opportunities, or emerging trends

Pacific organisations receive little, if any funding, from proceeds returning to the community , and it is proportionality even less as a share in relation to the relative gambling harm (gambling losses) which furthers inequity. Many grants are also awarded outside of the region.

Equity considerations

Equity considerations for Pacific communities should be explicitly reflected in the assessment of gambling harm. Evidence from New Zealand research and monitoring consistently identifies Pacific peoples as a priority population due to experiencing disproportionate gambling-related harm compared with their share of the population. This is recognised in the Ministry of Health's Strategy to Prevent and Minimise Gambling Harm, which identifies Pacific peoples as a priority group for harm prevention and service responses.

Research also shows that electronic gaming machine (pokie) venues are more commonly located in areas of higher socioeconomic deprivation. Pacific communities are disproportionately represented in many high-deprivation areas of Aotearoa New Zealand, resulting in greater exposure and accessibility to gambling opportunities. Increased availability and exposure to gambling products are recognised risk factors for gambling harm and can contribute to existing health and social inequities.

[2] Kolandai-Matchett K, Langham E, Bellringer M, Siitia PA. How gambling harms experienced by Pacific people in New Zealand amplify when they are culture-related. Asian J Gambl Issues Public Health. 2017;7(1):5. doi: 10.1186/s40405-017-0026-3. Epub 2017 Aug 18. PMID: 28868234; PMCID: PMC5562785.

[3] 2023 Census; https://figure.nz/chart/se7Hm2ePSB2L58Db

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 16/10/2026

First name: Helen Louisa Last name: Parker

Organisation: Swimming Taranaki

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
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Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be

47

Option 3	established in one or more parts of the District.

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

Please see the attached letter in support from Swimming Taranaki.

Attached Documents

Name
NZCT Class 4 pokey machine support

5

NZ Community Trust – Swimming Taranaki

NZ Community Trust assists with funding towards the wages of our paid part-time Regional Administrator. This year we received $20k for this purpose.

Our Regional Administrator is our only paid employee and plays a vital role in the successful operation and development of swimming throughout Taranaki. She manages the administration and financial requirements of the organisation, coordinates swim meets and Taranaki representative teams, actively supports our clubs and volunteers, maintains our website and social media, and ensures our governance and policy requirements are met.

A key focus of her role is increasing participation and engagement across the region. She organises our Summer Series – Give it Go, which provides children under 14 with a fun and relaxed introduction to competitive swimming at four outdoor pools across Taranaki, at no cost to participants. She also organises our Junior and Intermediate Swim Camps, giving young swimmers the opportunity to develop their skills, build confidence and connect with other swimmers from around the region.

The Regional Administrator also plays an important role in promoting swimming across all ages. Our Taranaki Masters competition continues to grow in popularity, encouraging swimming for health, fitness and longevity and providing an inclusive opportunity for older swimmers to remain involved in the sport.

Our vision is *"striving for excellence and achievement across all tiers of swimming in our community"*, with a purpose of supporting, developing and leading swimming in Taranaki. Having a dedicated administrator is essential to achieving this vision, supporting our clubs and volunteers and ensuring that programmes and opportunities are available to swimmers of all ages and abilities.

Funding towards this position makes a significant difference to the sustainability and continued growth of Swimming Taranaki and directly supports participation and engagement in swimming throughout our region.

Should you require any further information, please do not hesitate to contact me on the number below.

Yours sincerely

Daniel Hancock

Board Chair Swimming Taranaki

[redacted]

Review of Gambling Policies

5

Submitter Details

Submission Date: 19/10/2026

First name: Jo Last name: Salisbury

Organisation: NZCT

Prefered method of contact

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

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Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

Your Comments

Thank you for giving NZCT the opportunity to be involved in the public consultation on your Class 4 Gambling Policy. Engaging with the community and key stakeholders provides for balanced and effective policy making.

NZCT supports the current capped policy and flexible relocation policy

NZCT supports Council's current capped policy at current levels (10 venues, 121 EGMs) as it provides your district with a popular form of entertainment that also delivers extensive community funding benefits. The status quo relocation policy is sensible and should be retained. A workable relocation provision allows venues to move to more suitable premises, protects

operators from onerous lease terms, and supports re-establishment following unforeseen disruptions such as fire or n disaster.

Sinking lids don't reduce gambling harm

Despite substantial reductions in machine numbers over time, national data does not show a corresponding reduction in problem gambling rates.

Since 2003 when the Gambling Act (2003) was promulgated, many councils have implemented sinking lid policies, leading to a reduction of 11,470 pokie machines nationwide (a 45% decrease; DIA). As the graph below illustrates, since 2014, there has been a reduction of 2,966 machines nationwide (an 18% decrease; DIA). Despite this, Health NZ reports that the rate of problem gambling and those at moderate risk of gambling harm (all gambling types) has remained stable over the same period, fluctuating only slightly between 1.8% in 2014 and 2.4% in 2024.

NZ has a low problem gambling rate

In response to an OIA request, the Ministry of Health explains that the 2024 percentage split for moderate-risk gamblers and high-risk (problem) gamblers is as per the table below.

It is important to note that moderate-risk gamblers and problem gamblers are by definition distinctly different.

The Canadian Problem Gambling Index (CPGI) which the Ministry of Health uses as the template for its Problem Gambling Severity Index (PGSI), characterises 'problem gamblers' as people who experience harm[3] and goes on to explain that 'Moderate risk' gamblers are defined as people who *'may or may not have experienced adverse consequences from gambling."*

For clarity, this is stating that moderate risk gamblers are at moderate risk (or in other words have a moderate chance) of experiencing harm at some level from their gambling. This is different to the incorrect interpretation you may see in submissions which describe the category as people who uniformly suffer moderate levels of harm.

Some submissions may also explain that 'low risk' gamblers also experience harm at low levels. But again, the PGSI states that *"…[t]his group likely will not have experienced any adverse consequences from gambling."*… at all.

Problem gambling in context

New Zealand's rate of problem gambling (not inclusive of moderate risk) is low by international standards as the following table and study shows.

Relatively few New Zealanders are classified as problem gamblers under PGSI measures. The majority of gambling participation falls outside categories associated with measurable harm.

For comparison, whilst problem gambling in New Zealand occurs at a rate of 0.5% - with pokies making up approximately half (0.25%) of that figure [5] - the rate of hazardous drinking (have drunk hazardously in a way that can harm themselves or others[6]) is 16.6% of adults, which is equivalent to about 720,000 people[7].

Despite the rate of hazardous alcohol consumption being sixty-six (66) times greater than problem Class 4 gambling, policy responses generally do not seek to eliminate alcohol availability, recognising that most adults can enjoy it responsibly. Alcohol is regulated through licensing, trading hours and host responsibility, not by seeking to reduce the number of bars.

The comparison illustrates the importance of proportional and evidence-based policy responses.

A sinking lid Council gaming policy would ultimately eliminate the availability of a legal and popular form of gambling entertainment for the 99.5% of adult New Zealanders who are not problem gamblers.

Historical and international policy experience suggests that prohibition approaches can result in unintended consequences and is not an effective tool for minimising harm. Eliminating gaming rooms over time does not address the root causes of problem gambling, especially since individuals can now easily shift to online gambling, which is available 24/7, has fewer controls as physical in-venue Class 4 gaming environments, and currently provides no return to the community in the form of grants.

Whilst co-morbidity can occur between problem gambling and other negative behaviours, The New Zealand Gambling Study Wave 4 (2015) states that there is no evidence for causative effects from problem gambling to those other

negative experiences. It states that although problem gambling is "*highly co-morbid with substance use disorders and other behavioural add as well as with mood, anxiety and personality disorders…*" [8] the "*…relationships between gambling and other mental health disorders are complex, prospective studies have found that substance use, substance use disorders and behavioural addictions are robust predictors of problem gambling onset…*"[9] and not the reverse.

The Class 4 sector is heavily regulated

Despite the number of problem gamblers being very small, the Class 4 sector works hard to minimise harmful behaviours. The Class 4 sector contributes over half of the annual $20 million problem gambling levy that funds a nationwide network of problem gambling services. Additionally, NZCT alone invests $650,000 annually in harm minimisation initiatives, including staff training, resources, and technology.

Gaming rooms operate within strict harm minimisation regulations, with staff trained to identify and intervene when they observe signs of harm. For example, venue staff must undertake record-keeping sweeps of gaming rooms three times an hour to monitor for, and act on, signs of harm. Furthermore, venue staff must discuss with a customer their gambling activity should a customer attempt to make a second withdrawal of money in a day from an in-venue ATM for the purposes of additional in-venue Class 4 gambling.

Responsible management and enhanced Harm Minimisation Regulations

The regulatory framework for Class 4 gambling ensures gaming room activities are managed with transparency and accountability.

In 2023, there were updates to these regulations that have strengthened oversight, further promoting responsible gambling practices and enhancing community trust.

The decline of Class 4 and rise of online gambling

Class 4 no longer accounts for the largest share of annual gambling expenditure in New Zealand. Inflation adjusted Class 4 spending since 2010/11 has dropped 14% to $1.02 billion in the year to September 2025[10], and is down 0.8% (-$8.6 million) year on year. Meanwhile, online casino gambling expenditure has grown from nearly zero in 2010/11 to $1.36 billion in the year ending September 2025[11] and is up 10.5% ($129.6 million) year on year. Lotto is also enjoying strong growth experiencing a 31% increase over the same period.

In South Taranaki specifically, pokie expenditure per capita is also down from $230.39 in 2016 to $215.49 in 2025 (a 6.5% per capita drop in inflation-adjusted expenditure over ten years).

With the emergence of online gambling, it is unclear what effect sinking lids are having in migrating problem gamblers online where there are fewer protections against problem gambling compared to those provided by physical in person Class 4 venues.

Reducing Class 4 expenditure does not reduce harm

Claims that sinking lid policies have led to a 13% reduction in harm misinterprets research that indicated sinking lids decreased expenditure (not harm) by 13%. There is no evidence that indicates that there is a 1:1 correlation between expenditure and harm. Interestingly, the same research also found that per capita caps had the same effect on expenditure[15].

Sinking lid policies do however pose a significant risk to the sustainability of pokie grants which are essential for supporting non-profit organisations to foster happier, healthier, and more connected communities.

Evaluating the impact of sinking lids

In 2025, Class-4 societies awarded $765,497[16] in grants within South Taranaki. NZCT contributed 7% ($50,956) of this.

Over NZCT's last three complete financial years 2022/23 – 2024/25, NZCT awarded 31 grants in South Taranaki totalling $184,987. During the same period, NZCT approved thousands of dollars more of region-wide and nationwide grants, $195,713

of which can be identified as being of direct benefit to the people of South Taranaki. In total, $380,700 of NZCT grants ben South Taranaki in this period.

If a sinking lid was introduced, and ultimately achieved its inevitable outcome of eliminating all Class 4 funding in South Taranaki, who or what will replace the $765,497 per annum being invested by Class 4 societies into South Taranaki community good?

Were Council to replace this funding (and there are no other obvious alternatives), Council would need to increase rates by 1.1% in addition to the 5.4% increase already in place in 2026/27. We note that under the impending 4% cap on local government rate increases a 6.5% increase will not be possible.

Furthermore, note that from 2027, online casino gambling providers will only be required to return 4% of their gross profit via a centralised distribution model, that will likely result in a proportionate amount of that funding not being returned to South Taranaki.

This does not compare well to the Class 4 sector's requirement to return a minimum of 40% of its gross profit and 100% of its net profit back to the community (and typically where the funds are raised).

For commercially driven, online casino gambling providers, their community dividend (tax) is a cost of doing business, whereas for Class 4 societies our community distributions are our primary objective.

Entertainment value

Class 4 gambling rooms offer recreational and social opportunities for residents. These hospitality establishments provide entertainment options and foster social connectivity in a way that online gambling does not, all whilst generating vital community funding.

Gambling has a net positive wellbeing benefit

In New Zealand, gambling in all its forms contributes net positive well-being benefits of approximately $2 billion annually[17]. This value is the sum of its entertainment value, the resulting government revenue, the problem gambling levy, and the globally unique provision of community grants that inject money into a community's not-for-profit sector and the local retail and service industries that support it.

Sustainable class 4 policy

Retaining the current policy allows for growth, and a flexible relocation policy helps ensure that gaming remains a safe, responsible, and enjoyable form of entertainment for residents, that currently contributes an annual benefit of $765,497 to the South Taranaki community.

By balancing growth with responsible oversight, the policy can continue to foster entertainment opportunities and social connection for South Taranaki residents, while sustaining vital funding for local initiatives.

Attached Documents

Name
261007 South Taranaki Submission (002)
Grants to South Taranaki -2022-23 to 2024-25 (002)

South Taranaki Class 4 Gambling Policy Public Consultation

Thank you for giving NZCT the opportunity to be involved in the public consultation on your Class 4 Gambling Policy. Engaging with the community and key stakeholders provides for balanced and effective policy making.

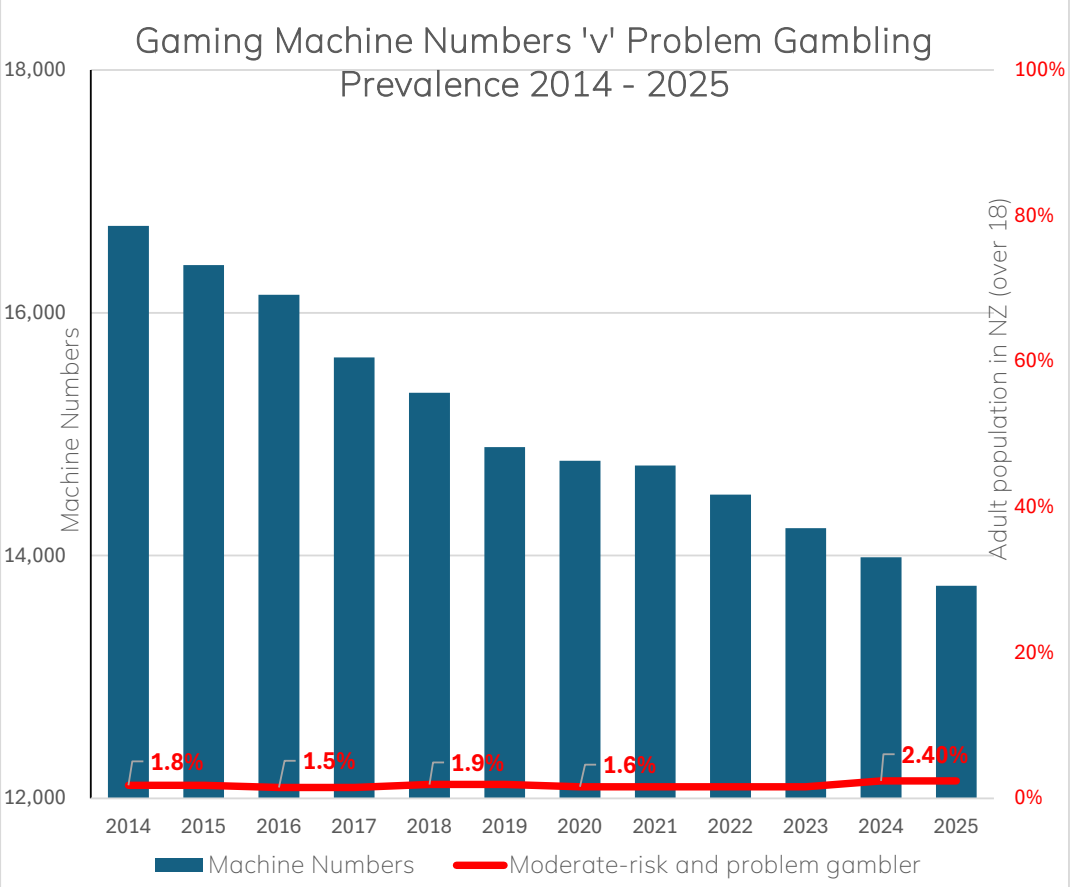
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Since 2003 when the Gambling Act (2003) was promulgated, many councils have implemented sinking lid policies, leading to a reduction of 11,470 pokie machines nationwide (a 45% decrease; DIA). As the graph below illustrates, since 2014, there has been a reduction of 2,966 machines nationwide (an 18% decrease; DIA). Despite this, Health NZ reports that the rate of problem gambling and those at moderate risk of gambling harm (all gambling types) has remained stable over the same period, fluctuating only slightly between 1.8% in 2014 and 2.4% in 2024.



*

Note: the problem gambling rate measures ALL forms of gambling – pokies make up approximately half of the 2.4% of moderate-risk and problem gamblers shown above.[1]

NZ has a low problem gambling rate

In response to an OIA request, the Ministry of Health explains that the 2024 percentage split for moderate-risk gamblers and high-risk (problem) gamblers is as per the table below. [2]

	Total
Problem Gambling Severity Index (PGSI)	**% (95CI)**
High-risk (problem) gambler	0.5*(0.2-0.8)
Moderate-risk gambler	1.9 (1.5-2.5)

**Health NZ states that the result should be viewed as unreliable, and caution should be used when interpreting the result, as Relative Standard Error is between 0.25 and 0.5.*

[1] Gambling harm intervention services data | Ministry of Health NZ

[2] **Ministry of Health Response to NZCT OIA request 16th April 2025 (attached as appendix)*

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Problem gambling in context

New Zealand's rate of problem gambling (not inclusive of moderate risk) is low by international standards as the following table and study shows.[4]

Comparing National Problem Gambling Prevalence Rates

Jurisdiction	Year	Problem Gambling Rate
USA	2015	4.60%
South Africa	2013	3.20%
Macau	2005	2.50%
Czech Republic	2014	2.30%
Cyprus	2012	2.20%
Northern Ireland	2010	2.20%
Canada	2005	2.00%
Hong Kong	2012	1.90%
Hungary	2012	1.90%
Germany	2015	1.70%
Brazil	2010	1.30%
Italy	2010	1.27%
Denmark	2012	0.90%
Iceland	2015	0.80%
Great Britain	2012	0.70%
Finland	2014	0.60%
South Korea	2013	0.50%
Singapore	2015	0.50%
France	2015	0.50%
Australia	2016	0.40%

[3] Canadian Problem Gambling Index: Final Report Feb 19, 2001

[4] Calado F, Griffiths MD. Problem gambling worldwide: An update and systematic review of empirical research (2000-2015). Journal of Behavioural Addictions 2016; 5(4): 592-613. Doi:10.1556/2006.5.2016.073

Norway	2009	0.40%
Sweden	2014	0.30%
New Zealand	2015	0.20%

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For comparison, whilst problem gambling in New Zealand occurs at a rate of 0.5% - with pokies making up approximately half (0.25%) of that figure [5] - the rate of hazardous drinking (have drunk hazardously in a way that can harm themselves or others[6]) is 16.6% of adults, which is equivalent to about 720,000 people[7].

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[5] Gambling harm intervention services data | Ministry of Health NZ
[6] Alcohol Resources — Key facts about drinking in New Zealand
[7] https://www.health.govt.nz/publications/annual-update-of-key-results-202324-new-zealand-health-survey
[8] Pg 26 - https://www.health.govt.nz/system/files/2018-08/national-gambling-study-report-6-aug18.pdf
[9] Pg 26 - https://www.health.govt.nz/system/files/2018-08/national-gambling-study-report-6-aug18.pdf

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Responsible management and enhanced Harm Minimisation Regulations

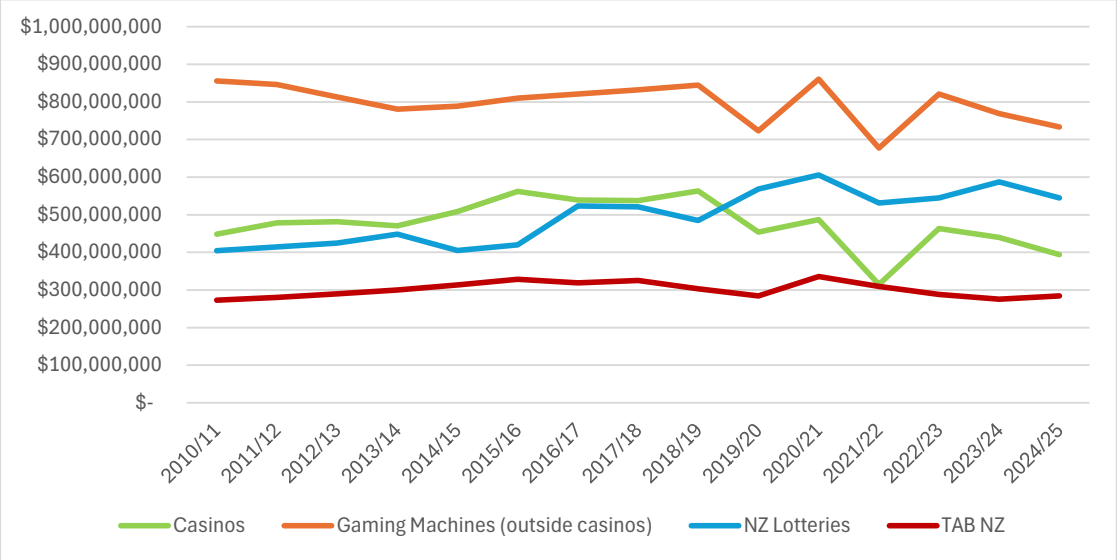
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In 2023, there were updates to these regulations that have strengthened oversight, further promoting responsible gambling practices and enhancing community trust.

The decline of Class 4 and rise of online gambling

Class 4 no longer accounts for the largest share of annual gambling expenditure in New Zealand. Inflation adjusted Class 4 spending since 2010/11 has dropped 14% to $1.02 billion in the year to September 2025[10], and is down 0.8% (-$8.6 million) year on year. Meanwhile, online casino gambling expenditure has grown from nearly zero in 2010/11 to $1.36 billion in the year ending September 2025[11] and is up 10.5% (+$129.6 million) year on year. Lotto is also enjoying strong growth experiencing a 31% increase over the same period.

Inflation Adjusted Gambling Expenditure[12]



NB: Online casino gambling data is missing from this graph as the DIA are not currently aggregating this with other gambling sector data.

In South Taranaki specifically, pokie expenditure per capita is also down from $230.39 in 2016 to $215.49 in 2025 (a 6.5% per capita drop in inflation-adjusted expenditure over ten years).[13][14]

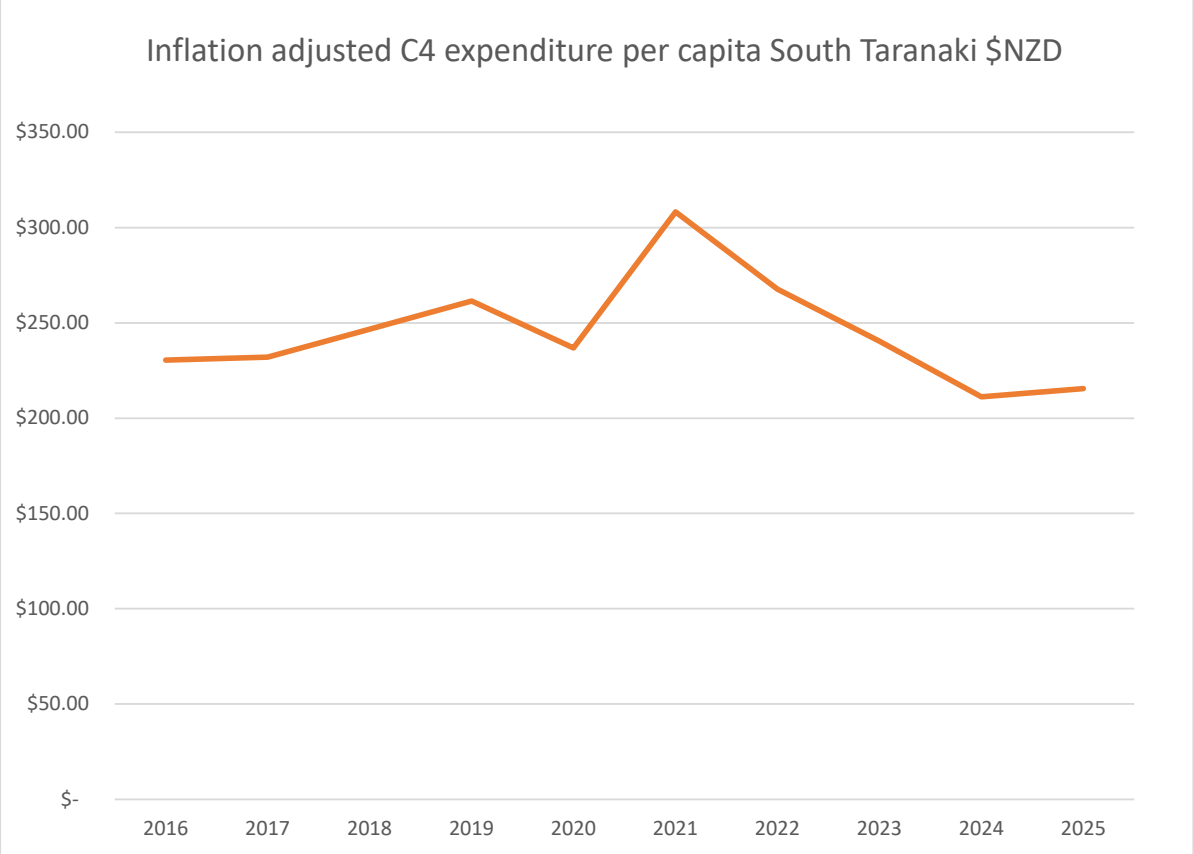
[10] https://www.dia.govt.nz/gambling-statistics-expenditure

[11] DIA x Dot Historical Market Analysis pages 9 and 10

[12] *DIA Gambling Expenditure Statistics Report*

[13] https://regions.infometrics.co.nz/south taranaki-district/population/growth - age group 20+

[14] www.dia.govt.nz/gambling-statistics-expenditure



With the emergence of online gambling, it is unclear what effect sinking lids are having in migrating problem gamblers online where there are fewer protections against problem gambling compared to those provided by physical in person Class 4 venues.

Reducing Class 4 expenditure does not reduce harm

Claims that sinking lid policies have led to a 13% reduction in harm misinterprets research that indicated sinking lids decreased expenditure (not harm) by 13%. There is no evidence that indicates that there is a 1:1 correlation between expenditure and harm. Interestingly, the same research also found that per capita caps had the same effect on expenditure[15].

Sinking lid policies do however pose a significant risk to the sustainability of pokie grants which are essential for supporting non-profit organisations to foster happier, healthier, and more connected communities.

[15] https://www.health.govt.nz/publications/capping-gambling-in-nz-the-effectiveness-of-local-government-policy-interventions

Evaluating the impact of sinking lids

In 2025, Class-4 societies awarded $765,497[16] in grants within South Taranaki. NZCT contributed 7% ($50,956) of this.

Over NZCT's last three complete financial years 2022/23 – 2024/25, NZCT awarded 31 grants in South Taranaki totalling $184,987. During the same period, NZCT approved thousands of dollars more of region-wide and nationwide grants, $195,713 of which can be identified as being of direct benefit to the people of South Taranaki. In total, $380,700 of NZCT grants benefited South Taranaki in this period.

If a sinking lid was introduced, and ultimately achieved its inevitable outcome of eliminating all Class 4 funding in South Taranaki, who or what will replace the $765,497 per annum being invested by Class 4 societies into South Taranaki community good?

Were Council to replace this funding (and there are no other obvious alternatives), Council would need to increase rates by 1.1% in addition to the 5.4% increase already in place in 2026/27. We note that under the impending 4% cap on local government rate increases a 6.5% increase will not be possible.

Furthermore, note that from 2027, online casino gambling providers will only be required to return 4% of their gross profit via a centralised distribution model, that will likely result in a proportionate amount of that funding not being returned to South Taranaki.

This does not compare well to the Class 4 sector's requirement to return a minimum of 40% of its gross profit and 100% of its net profit back to the community (and typically where the funds are raised).

For commercially driven, online casino gambling providers, their community dividend (tax) is a cost of doing business, whereas for Class 4 societies our community distributions are our primary objective.

Entertainment value

Class 4 gambling rooms offer recreational and social opportunities for residents. These hospitality establishments provide entertainment options and foster social connectivity in a way that online gambling does not, all whilst generating vital community funding.

[16] See Appendix 2 - for possible reasons why the amount distributed by Class 4 societies in South Taranaki does not match 40% of the gaming machine proceeds (GMP) generated in South Taranaki.

Gambling has a net positive wellbeing benefit

In New Zealand, gambling in all its forms contributes net positive well-being benefits of approximately $2 billion annually[17]. This value is the sum of its entertainment value, the resulting government revenue, the problem gambling levy, and the globally unique provision of community grants that inject money into a community's not-for-profit sector and the local retail and service industries that support it.

Sustainable class 4 policy

Retaining the current policy allows for growth, and a flexible relocation policy helps ensure that gaming remains a safe, responsible, and enjoyable form of entertainment for residents, that currently contributes an annual benefit of $765,497 to the South Taranaki community.

By balancing growth with responsible oversight, the policy can continue to foster entertainment opportunities and social connection for South Taranaki residents, while sustaining vital funding for local initiatives.

Appendix 1

Ministry of Health OIA request – Split of problem gamblers to moderate risk gamblers

[17] TDB Advisory Report 2021 Page 87

MINISTRY OF HEALTH
MANATŪ HAUORA

133 Molesworth Street
PO Box 5013
Wellington 6140
New Zealand
T+64 4 496 2000

16 April 2025

Jo Salisbury

By email: [redacted]
Ref:

Tēnā koe Jo

Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act) to the Ministry of Health – Manatū Hauora (the Ministry) on 19 March 2025 for information regarding the latest New Zealand Gambling Survey. Please find a response to each part of your request below:

> *Looking for some clarification please following the latest gambling survey release by Health NZ - Kupe - Data Explorer. Please can we have the split of problem gamblers to moderate risk gamblers as they have been combined in the same category.*
> *We've noticed that the survey has combined moderate risk gamblers and problem gamblers to get a total of 2.4% or 104,000 people. Can you please provide the split here as per previous reports?*

The percentage splits for moderate-risk gamblers and high-risk (problem) gamblers are provided in the table below.

	Total	Male	Female
Problem Gambling Severity Index (PGSI)	**% (95CI)**	**% (95CI)**	**% (95CI)**
High-risk (problem) gambler	0.5 ^ (0.2-0.8)	0.7 ^ (0.2-1.4)	0.3 ^ (0.1-0.6)
Moderate-risk gambler	1.9 (1.5-2.5)	2.2 (1.5-3.1)	1.7 (1.1-2.6)

^Indicates result should be viewed as unreliable, and caution should be used when interpreting the result, as Relative Standard Error is between 0.25 and 0.5.

Appendix 2

Possible reasons why the amount distributed by Class 4 societies in South Taranaki does not match 40% of the gaming machine proceeds (GMP) generated in South Taranaki.

1. **GST.** The 40% minimum is worked out on gross proceeds excluding GST. Published GMP figures include GST.
2. **Granted.org coding.** Granted.org doesn't always show the full funding picture. Due to limitations in how the DIA aggregates Class 4 grants data, grants awarded to more than one region e.g. South Taranaki and neighbouring TLAs are only coded to a single TLA, so grants drawing funds from and benefiting South Taranaki may not always appear in your district's grants list.
3. **Clubs.** Clubs who operate Class 4 gaming machines have their GMP captured in the DIA's GMP data for each TLA, but the funds such clubs apply to their own purposes do not appear in Granted.org. which effect the 40% calculations.
4. **Not enough applications.** Occasionally there are simply not enough quality applications to award funds to in a given TLA. If this occurs, NZCT's policy is to roll over residual funds at financial year end into the next financial year. Funds raised in South Taranaki remain ringfenced for allocation in South Taranaki until spent.
5. **Not enough funds generated.** The 40% requirement is applied to societies on a national scale and does not always scale down to a given TLA. In some TLAs, venues may not generate a gross profit of 40% which makes returning 40% of profit impossible.

Although a community return of 40% of gross profit may not be achievable, NZCT returns **100% of net profit** back into the region that it is generated in (apart from a small amount allocated to causes of nationwide significance).

Summary check: if the amount distributed doesn't match 40% of GMP

Have you…	What to check	✓
Taken GST out of the GMP figure? (point 1)	Published GMP includes GST. Divide it by 1.15 before working out 40%.	☐
Looked for grants coded to another TLA? (point 2)	Grants covering more than one region are coded to a single TLA in Granted.org. Check neighbouring TLAs, e.g. New Plymouth, for grants that also benefit South Taranaki.	☐
Allowed for club GMP? (point 3)	Club proceeds are in the DIA's GMP figure, but what clubs spend on their own purposes isn't in Granted.org.	☐
Checked for funds being rolled over? (point 4)	Unspent funds stay ringfenced for South Taranaki and carry into the next financial year.	☐
Considered whether venues generate enough profit? (point 5)	The 40% rule applies nationally. In some TLAs, venues don't generate enough profit to make a 40% local return possible.	☐

Grants to South Taranaki - 2022/23 to 2024/25

Grant #	Organisation	Total Amount Approved	Amount drawn from South Taranaki	Date of Approval	Purpose
102502	Athletics Hawera Inc	$1,000.00	$1,000.00	13/12/2023	Accommodation
111718	Auroa School	$2,525.73	$2,525.73	27/08/2025	Coaching; Equipment
98454	Border Rugby & Sports Club Inc	$4,000.00	$4,000.00	2/05/2023	Transport costs
109719	Coastal Rugby Football Club Inc	$10,000.00	$10,000.00	15/04/2025	Uniforms and equipment; Physio services and medical supplies; Travel
103240	Coastal Rugby Football Club Inc	$15,000.00	$15,000.00	19/02/2024	Playing uniforms, travel, equipment, physio and medical supplies
96812	Coastal Rugby Football Club Inc	$15,000.00	$15,000.00	21/03/2023	Medical items and physiotherapy costs; Accommodation; Playing uniforms and equipment; Travel costs
109710	Eltham Association Football Club Inc	$5,000.00	$5,000.00	26/02/2025	Playing uniforms, balls, equipment, line marking paint
104402	Eltham Association Football Club Inc	$2,000.00	$2,000.00	24/04/2024	Equipment, bibs and maintenance
98078	Eltham Association Football Club Inc	$6,615.43	$6,615.43	19/04/2023	Equipment
97615	Hawera Basketball Association Inc	$2,000.00	$2,000.00	19/04/2023	Venue hire
99048	Kaponga Primary School	$20,000.00	$20,000.00	19/09/2023	Court surfacing
106926	Matapu School	$2,385.00	$2,385.00	15/10/2024	Sports T-shirts
106944	Opunake Bowling Club Incorporated	$1,869.74	$1,869.74	23/10/2024	Chemicals and fertilisers
102125	Opunake Bowling Club Incorporated	$7,000.00	$7,000.00	15/11/2023	Equipment
104082	Opunake Community Baths Society Inc	$5,000.00	$5,000.00	16/04/2024	Salary
97563	Opunake Golf Club Inc	$10,000.00	$10,000.00	20/06/2023	Roof replacement
111784	Opunake High School	$10,000.00	$10,000.00	11/07/2025	Travel and accommodation
99268	Opunake High School	$10,000.00	$10,000.00	18/07/2023	Accommodation
100336	Opunake Indoor Basketball Association Inc	$3,750.00	$3,750.00	10/08/2023	Accommodation
102613	Opunake School	$5,000.00	$5,000.00	16/01/2024	Playground upgrade
108941	Opunake Sports & Recreation Trust	$10,000.00	$10,000.00	17/02/2025	Painting
101251	Opunake Sports & Recreation Trust	$10,000.00	$10,000.00	22/11/2023	Equipment
95742	Patea Carlyle Pony Club Inc	$655.50	$655.50	2/05/2023	Club jackets
90722	Patea Rugby & Sports Club Inc	$6,500.00	$6,500.00	20/06/2023	Playing uniforms; Travel costs
110688	Pihama Bowling Club Inc	$2,330.58	$2,330.58	16/07/2025	Chemicals and fertilisers
105917	Pihama Bowling Club Inc	$2,000.00	$2,000.00	17/07/2024	Chemicals, fertilisers, mower engine replacement
97723	Southern Rugby Football Club Taranaki Inc	$5,000.00	$5,000.00	29/03/2023	Bus transport
97737	St Josephs School Opunake	$4,000.00	$4,000.00	15/03/2023	Sports uniforms
100206	Taranaki Indoor Bowls Centre Inc	$2,315.00	$2,315.00	10/08/2023	Travel and accommodation
99236	Taranaki Indoor Bowls Centre Inc	$2,940.00	$2,940.00	14/06/2023	Travel and accommodation
111338	Te Ngutu Golf Club Inc	$1,100.00	$1,100.00	3/06/2025	Golf putting cups
		$184,986.98	**$184,986.98**		
Regional and multi-regional grants that benefit South Taranaki					
98309	Alzheimers Taranaki Inc	$5,000.00	$350.00	15/05/2023	Salary

Grant #	Organisation	Total Amount Approved	Amount drawn from South Taranaki	Date of Approval	Purpose
100568	Arts Festival Taranaki Charitable Trust	$17,767.21	$1,243.70	19/09/2023	Venue hire
108804	Athletics Taranaki Inc	$20,000.00	$200.00	14/01/2025	Salary
102394	Athletics Taranaki Inc	$35,000.00	$2,450.00	12/12/2023	Hammer cage; Salary
103555	Basketball Taranaki Inc	$50,328.58	$1,006.57	21/05/2024	Hoops in Schools: Coaching and Hoops including installation
102719	Basketball Taranaki Inc	$219,671.42	$4,393.43	19/03/2024	Stadium hire and office rent; Equipment; Travel and accommodation; Salaries
97370	Basketball Taranaki Inc	$173,322.00	$5,199.66	21/03/2023	Stadium hire and office rent; Coaching in schools, administration; Basketballs; Salaries
94978	Basketball Taranaki Inc	$94,988.40	$14,248.26	27/10/2022	Coaching sessions; Installation of basketball systems
101499	Big Brothers Big Sisters of Taranaki	$3,000.00	$210.00	15/11/2023	Swimming lessons
100906	Bowls Taranaki Inc	$10,000.00	$700.00	8/09/2023	Salary
104228	Cancer Society of NZ Central Districts Division Inc	$20,000.00	$100.00	16/04/2024	Salaries
95373	Cancer Society of NZ Central Districts Division Inc	$20,000.00	$1,200.00	27/10/2022	Salaries
102616	Cancer Society of NZ Taranaki Centre Inc	$9,940.00	$695.80	16/01/2024	Event costs for Relay For Life 2024
96743	Cancer Society of NZ Taranaki Centre Inc	$7,000.00	$210.00	12/12/2022	Marquee hire (with trestle tables) and medical services
103450	Capital Football Incorporated	$300,000.00	$576.34	19/02/2024	Contractors and operational costs for Football For All programme (on behalf of all Federations)
100237	Capital Football Incorporated	$125,000.00	$477.52	19/09/2023	Travel and accommodation for 2023 Futsal Youth Championships (on behalf of all Federations)
91832	Capital Football Incorporated	$175,000.00	$784.96	20/06/2023	Travel and accommodation for 2023 National Youth Development League (on behalf of all Federations)
104245	CCS Disability Action South and Central Taranaki Inc	$2,000.00	$287.50	24/04/2024	Salary
100057	CCS Disability Action South and Central Taranaki Inc	$960.00	$357.95	10/08/2023	Flags
97292	CCS Disability Action South and Central Taranaki Inc	$1,670.00	$360.12	15/02/2023	Camera
99175	Central Canoe Polo Association Inc	$1,200.00	$25.44	28/06/2023	Accommodation
102672	Central Districts Cricket Association Inc	$108,000.00	$3,118.10	16/01/2024	Salaries
97045	Central Districts Cricket Association Inc	$108,000.00	$1,317.52	16/02/2023	Salaries
105118	Central Districts Indian Sport Club Inc	$6,210.00	$64.94	22/05/2024	Travel and accommodation
101714	Central Squash Association Incorporated	$17,874.00	$624.72	22/11/2023	Salary
98081	Eagles Golfing Society of Taranaki Inc	$10,107.82	$303.23	19/04/2023	Travel and accommodation; Course hire
105771	East Taranaki Environment Trust	$3,000.00	$60.00	16/07/2024	Salary
100597	Egmont Agricultural & Pastoral Association	$30,000.00	$2,100.00	22/11/2023	Salaries
102463	Eventing Taranaki Inc	$10,000.00	$200.00	16/01/2024	Event costs
99756	Fencing Central Inc	$30,000.00	$625.80	22/08/2023	Fencing equipment

Grant #	Organisation	Total Amount Approved	Amount drawn from South Taranaki	Date of Approval	Purpose
103200	Frontline Ambulance Charitable Trust	$5,090.00	$48.62	1/02/2024	Equipment (rental of medical gases)
101283	Horses Helping Humans Taranaki	$5,000.00	$350.00	2/11/2023	Contractor
97322	Horses Helping Humans Taranaki	$5,000.00	$150.00	21/03/2023	Contractor
104639	Kart Sport Taranaki Inc	$11,000.00	$220.00	21/05/2024	Event costs from 21 May 2024
98834	Kart Sport Taranaki Inc	$5,246.25	$367.23	14/06/2023	Ambulance and first aid cover for events from 24 September 2023
97069	Kart Sport Taranaki Inc	$6,000.00	$180.00	31/01/2023	Ambulance and first aid cover for events
106405	Lower North Island Secondary Schools Netball Inc	$5,750.00	$13.47	28/08/2024	Accommodation
100151	Lower North Island Secondary Schools Netball Inc	$18,000.00	$340.61	22/08/2023	Accommodation
104667	Mid Central Zone of NZRL Inc	$75,000.00	$675.00	20/06/2024	Salaries
98361	Mid Central Zone of NZRL Inc	$75,000.00	$2,696.50	20/06/2023	Salaries
103007	Netball Central Zone Inc	$206,000.00	$1,012.65	19/02/2024	Salaries
96755	Netball Central Zone Inc	$206,062.68	$1,890.71	17/01/2023	Vehicle lease; Salaries
105486	Netball Taranaki Incorporated	$240,000.00	$2,400.00	20/08/2024	Salaries
99704	Netball Taranaki Incorporated	$240,000.00	$16,800.00	18/07/2023	Salaries
106262	No 4 District Federation of NZ Football T/A Central Football Inc	$160,000.00	$706.51	20/08/2024	Salaries
100136	No 4 District Federation of NZ Football T/A Central Football Inc	$160,000.00	$4,456.11	22/08/2023	Salaries
104177	Platinum Elite Cheer & Tumble Inc	$7,000.00	$140.00	21/05/2024	Contractors
102426	Surfing Taranaki Inc	$20,000.00	$1,400.00	12/12/2023	Contractor
96271	Surfing Taranaki Inc	$26,000.00	$2,954.08	13/12/2022	Contractor
104673	Swimming Taranaki Incorporated	$20,000.00	$400.00	20/06/2024	Salary
100686	Tai Uru Haupoi Māori Inc	$18,988.81	$710.85	21/09/2023	Venue hire and turf hire; First aid cover
104426	Taranaki Badminton Association Inc	$20,000.00	$419.62	21/05/2024	Contractor
96042	Taranaki Badminton Association Inc	$20,000.00	$600.00	17/01/2023	Contractors
106896	Taranaki BMX Association Incorported	$5,781.25	$57.81	11/09/2024	First aid cover
100520	Taranaki BMX Association Incorported	$5,217.30	$365.21	23/08/2023	First aid cover
107932	Taranaki Cricket Association Inc	$90,000.00	$900.00	19/11/2024	Salaries
103165	Taranaki Cricket Association Inc	$90,000.00	$1,800.00	19/02/2024	Salaries
100254	Taranaki Cricket Association Inc	$15,000.00	$1,050.00	19/09/2023	Salary
101148	Taranaki Equestrian Jumping Inc	$30,000.00	$2,100.00	22/11/2023	Costs associated with hosting event
99749	Taranaki Equestrian Jumping Inc	$30,000.00	$2,100.00	22/08/2023	Judges trailer
95201	Taranaki Equestrian Jumping Inc	$50,000.00	$7,500.00	27/10/2022	Event costs
98162	Taranaki Foundation	$500,000.00	$15,000.00	19/04/2023	Playground redevelopment
100311	Taranaki Gardens Festival Charitable Trust	$12,000.00	$840.00	19/09/2023	Printing costs
106068	Taranaki Golf Association Inc	$30,000.00	$300.00	20/08/2024	Salaries
100126	Taranaki Golf Association Inc	$30,000.00	$2,100.00	22/08/2023	Salaries

Grant #	Organisation	Total Amount Approved	Amount drawn from South Taranaki	Date of Approval	Purpose
100549	Taranaki Hockey Incorporated	$116,000.00	$8,120.00	19/09/2023	Salaries
103541	Taranaki Hunt Inc	$5,000.00	$100.00	10/04/2024	Contractor
100185	Taranaki Motor Cycle Club Inc	$40,000.00	$2,800.00	19/09/2023	Dust suspension system
107925	Taranaki Multi Ethnic Council Inc	$15,000.00	$150.00	12/12/2024	Event costs
101036	Taranaki Outdoor Pursuits and Educational Centre Trust	$25,000.00	$1,750.00	22/11/2023	Contractors
95632	Taranaki Outdoor Pursuits and Educational Centre Trust	$25,000.00	$3,750.00	21/11/2022	Salary
99388	Taranaki Paraplegic and Physically Disabled Association Inc	$20,000.00	$1,400.00	22/11/2023	Salaries
101297	Taranaki Rugby Football Union Inc	$241,807.69	$16,926.53	17/10/2023	Salaries
106829	Taranaki Sports Trust	$168,500.00	$1,685.00	17/09/2024	Salaries
100745	Taranaki Sports Trust	$172,500.00	$12,075.00	19/09/2023	IT equipment; Salaries
101133	Taranaki Stock Car Club Inc	$10,000.00	$700.00	17/10/2023	Ambulance and paramedic services
102904	Taranaki Tennis Association Inc	$18,000.00	$1,260.00	16/01/2024	Contractor
96908	Taranaki Tennis Association Inc	$18,000.00	$540.00	16/02/2023	Contractor
103452	Taranaki Womens Refuge Charitable Trust	$5,000.00	$100.00	26/03/2024	Salary
97457	Taranaki Womens Refuge Charitable Trust	$5,000.00	$150.00	15/03/2023	Salary
105991	Tennis Capital-Coast Inc	$90,000.00	$297.14	20/08/2024	Salaries
100301	Tennis Capital-Coast Inc	$90,000.00	$2,998.69	19/09/2023	Salaries and contractor
100301	Tennis Capital-Coast Inc	$90,000.00	$1,908.26	19/09/2023	Salaries and contractor
105622	Wellington Hospitals Foundation	$150,000.00	$709.04	16/07/2024	Equipment for NICU supporting patients from Gisborne to Nelson
		$5,362,983.41	**$173,956.20**		

Grants to National organisations that benefit South Taranaki

96977	Canteen Aotearoa Inc	$40,000.00	$83.35	16/02/2023	Salaries
102433	Chamber Music NZ Trust Board	$139,300.00	$73.50	16/01/2024	Salaries and contractor
98784	Community Connections Supported Living Charitable Trust	$12,062.59	$334.31	18/07/2023	Travel and accommodation; T-shirts; Ten-pin bowling costs; Swimming costs
103248	Cystic Fibrosis Association of NZ	$80,000.00	$146.51	19/02/2024	Salaries
103718	Epilepsy Association of New Zealand Incorporated	$3,084.00	$44.36	13/03/2024	Salary
97236	Epilepsy Association of New Zealand Incorporated	$1,500.00	$22.50	1/03/2023	Salary
104597	Gymnastics NZ Inc	$240,000.00	$197.64	20/06/2024	Kiwi Gym Fun Review & Redevelopment; Salaries
106269	Halberg Foundation	$170,000.00	$133.92	20/08/2024	Salaries
100002	Halberg Foundation	$169,150.00	$2,655.77	22/08/2023	Salaries
100284	Life Flight Trust	$1,125,000.00	$8,729.08	22/08/2023	Air ambulance aircraft; Air ambulance service operational costs
105240	Louise Perkins Foundation	$5,000.00	$35.77	16/07/2024	Salaries

Grant #	Organisation	Total Amount Approved	Amount drawn from South Taranaki	Date of Approval	Purpose
97355	Motor Neurone Disease Association of NZ Inc	$11,000.00	$100.93	29/03/2023	Salary
104428	Motor Neurone Disease NZ Charitable Trust	$11,398.00	$59.90	24/04/2024	Salary
100772	NZ Cricket Inc	$65,867.72	$271.12	19/09/2023	Programme costs
105673	Parkinsons NZ	$30,000.00	$109.02	16/07/2024	Salaries
97335	Parkinsons NZ	$29,974.00	$236.52	21/03/2023	Salaries
105351	Special Olympics NZ	$270,000.00	$97.99	16/07/2024	Salaries
98502	Special Olympics NZ	$270,000.00	$1,884.20	20/06/2023	Salaries
100590	Stroke Foundation of NZ Limited	$12,000.00	$120.00	22/11/2023	Salaries
104826	Surf Life Saving NZ Manatopu Inc	$60,000.00	$135.14	20/06/2024	Salaries
97391	Surf Life Saving NZ Manatopu Inc	$60,000.00	$185.28	21/03/2023	Salaries
96773	Swimming NZ Inc	$80,000.00	$85.35	16/02/2023	Salaries and contractors
106833	The Scout Association of New Zealand	$95,000.00	$87.77	15/10/2024	Salaries
99870	The Scout Association of New Zealand	$95,000.00	$594.69	22/08/2023	Salaries
102061	Touch NZ Inc	$120,000.00	$588.06	16/01/2024	Salaries
103836	Volleyball NZ Inc	$99,000.00	$244.35	21/05/2024	Coaching; Travel and accommodation
98139	Volleyball NZ Inc	$100,000.00	$337.94	15/05/2023	Travel and accommodation
107852	Womad NZ Charitable Trust	$40,000.00	$400.00	12/12/2024	Event costs
102442	Womad NZ Charitable Trust	$40,000.00	$2,800.00	12/12/2023	Event costs
102779	Yachting NZ Inc	$145,000.00	$663.43	16/01/2024	Salaries
96774	Yachting NZ Inc	$145,000.00	$298.30	17/01/2023	Salaries
		$3,764,336.31	**$21,756.70**		
	Total	**$9,312,306.70**	**$380,699.88**		

Review of Gambling Policies

5

Submitter Details

Submission Date: 19/10/2026

First name: Dr Inbal Last name: Salz

Organisation: Health New Zealand

Prefered method of contact

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
Option 2	The establishment and relocation of venues and the maximum number of machines per venue remain unchanged but a 'sinking lid' policy for the total number of gaming machines would be applied over part or all of the District. A 'sinking lid' policy means if an existing venue is disestablished or stopped having gaming machines, a new venue would not be allowed to take on those machines. As a result, the number of gaming machines in the District would reduce over time.
Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 2 - I prefer that the establishment and relocation of venues and the number of machines per venue should remain unchanged but a sinking lid should be applied.

TAB Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy, which does not allow new TAB venues, would remain unchanged.
Option 2	The Policy would be amended to allow one or more new stand-alone venues to be established throughout the District.
Option 3	The Policy would be amended to allow one or more new stand-alone venues to be

Option 3	established in one or more parts of the District.

49

Option 1 (preferred option) - I agree that the existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Your Comments

5

Response to questions

NPHS commends South Taranaki District Council for their engagement with the community in the review of its Class 4 Gambling Venues, and TAB Venues policies.

Preferred option: Class 4 Gambling Venues Policy

NPHS supports **Option Two,** establishing a sinking lid policy in the South Taranaki District, with the following recommendation:

- Expanding Option Two to include a no relocations policy.

  If relocations continue to be permitted, under any policy, NPHS makes the following recommendation to Section 3.0 'Relocations'.

- The criteria to be considered when assessing any applications should have a harm minimisation focus and include consideration of the social deprivation of the proposed location.

  We also encourage the council to look for ways to take further steps to minimise harm from gambling, for example blocking online gambling websites on council public Wi-Fi networks.

Preferred option: TAB Venues Policy

NPHS supports **Option One**. The existing policy, which does not allow stand-alone TAB venues, should remain unchanged.

Specific Comments

Why a stronger policy is warranted - gambling harm evidence

Gambling causes harm to those who gamble, those close to them and the wider community. One in five New Zealand adults (22%) are affected at some point in their lives by their own or others' gambling[3]. The 2023/24 New Zealand Gambling Survey indicated that 55.4% of the population is concerned about the level of gambling in their community[4].

The burden of gambling harm at a household level in the past 12 months, meaning the portion who report experiencing an argument, going without essentials, or taking time off work due to gambling is 8.9% nationally. These household-level harms are disproportionately experienced by Māori (19.9%) and Pacific peoples (18.8%)[5].

Gambling-related harms include damage to health, emotional and psychological distress, financial difficulties, adverse effects on work and education, relationship conflict and criminal activity. There is a strong association between harmful gambling and family violence.

Gambling- related harm may also include involvement in criminal behaviour; research suggests up to two- thirds of those who gamble report their gambling behaviour was associated with the crimes they had committed, and that people who gamble more frequently are more likely to engage in illegal

activities[6].

Electronic gaming machines (EGMs) are particularly harmful due both to their design and the environments in which they are located. The majority of those accessing gambling harm intervention services cite EGMs as the primary mode of problem gambling[7]. Machines encourage continuous play and the reinvestment of winnings. The surrounding environments further support this. These environments ('pokie rooms') are often designed with dim lighting and a lack of spaces that promote social interaction, such as tables or communal areas. This creates conditions that encourage uninterrupted, solitary play[8 9].

Among those who have played EGMs at least once in the previous year, 20% were identified as at-risk gamblers. This risk increases markedly with frequency of play, with 50% of those who play EGMs monthly classified as at-risk gamblers[10].

Why it is particularly relevant to South Taranaki - gambling harm inequity

Gambling harm is unevenly distributed across population groups in Aotearoa New Zealand:

- The New Zealand Gambling Survey[11] found that:
  - Māori are 2.24 times more likely than non-Māori to be moderate-risk or high-risk gamblers
  - Pacific people are 2.31 times more likely than non-Pacific people to be moderate-risk or high-risk gamblers
  - Disabled people are 4.02 times more likely than non-disabled people to be moderate risk or high-risk gamblers
  - Young people make up approximately 25% of moderate and high-risk gamblers
- Class 4 Gambling venues are more likely to be located in areas of higher deprivation. Nationally there are over 10 times as many venues in the most deprived communities, as there are in the least deprived.[12]
- Of the 10 class four venues in South Taranaki, nine are in areas of highest deprivation, and one is in an area of medium-high deprivation[13] as shown in the figure below.

Across the community, 29.3% identify as Māori, and disproportionate number (72.6%) live in areas of medium high or very high deprivation[14]. These inequities make South Taranaki communities more vulnerable to gambling harm.

Why limit the number of electronic gaming machines

Gambling prevalence in South Taranaki

Across the South Taranaki region, there are 121 EGMs. Using DIA, census data, we calculate that South Taranaki has the highest number of EGMs per population in the Taranaki region, and 1.6 times as many EGMs per person as the national rate[15,16].

Distributions of Grants

Gambling machine operators are required by law to allocate a minimum 40% of proceeds back to community groups and organisations, but not necessarily to the community where the money was lost. The New Zealand Gambling Survey 2023/2024 found that 46.2% of respondents felt that raising money through gambling does more harm than good[17].

The system of grant allocation serves to transfer of resources away from local communities already experiencing disadvantage. In the year 2025 across South Taranaki $6,321,975 was generated in gaming

machine profits[18]. Comparatively only $765,497 was paid out in grants within the South Taranaki community[19], i.e. the South Taranaki community received less than 12% of the value of proceeds from gaming machines in the same year, rather than the 40% minimum.

National evidence supports the claim that distribution of grants is inequitable. The following figure demonstrates while most gambling expenditure comes from high deprivation areas, shown as gaming machine profits (GMP), the majority of grants are allocated to areas of low-no deprivation[20].

Evidence for sinking lids

Sinking lid policies have been shown to be effective in reducing gambling expenditure[21]. While, a cap prevents further growth, a sinking lid creates a gradual sustainable reduction in access to harmful EGMs over time. Modelling indicates that such policies can reduce gambling expenditure by 13-14%. They are also associated with a reduction in the number of people seeking problem gambling services, with an estimated 36% drop in service use modelled[22].

A potential argument against a sinking lid policy is that people may shift from EGMs to online gambling, including less-regulated offshore sites. However, NZ evidence does not support substantial substitution. Evidence indicates that reduced Class 4 gambling losses are unlikely to be replaced by other forms of gambling (including online or illegal gambling) and are more likely to be absorbed into other household spending[23]. National survey evidence also suggests that offshore online gambling remains a minority behaviour in NZ, with only 3.6% of adults reporting gambling on overseas websites[24]. Qualitative research shows that some individuals may shift their gambling online[25].

However, at a population level, a sinking lid policy is expected to reduce overall exposure and harm rather than drive people to other forms of gambling[26]. Fewer EGMs would mean households lose less money to gambling, which would lead to more income remaining in the community, spent on local goods and services.

We encourage the South Taranaki District Council to take steps available to them to contribute to the reduction of gambling harm, in line with the purpose of the Gambling Act (2003). The implementation of a sinking lid is a proven mechanism for reducing gambling harm in the community.

TAB Venues

Maintaining the status quo of no standalone TAB venues permitted to be established or consented within the district avoids creating additional gambling opportunities and is supported by the NPHS.
This is consistent with both a prevention approach to gambling-related harm, and promoting equity across the South Taranaki community

Final comments

Gambling harm has serious impacts and is inequitably experienced across communities. South Taranaki is made up of communities disproportionally impacted by gambling harm, and the region has the highest number of EGMs per population in the Taranaki region.

NPHS recommends that South Taranaki District Council strengthen gambling harm prevention by adopting a sinking lid policy for Class 4 gambling venues, with no relocations.

We commend the choice to retaining the current TAB Venues Policy that does not allow stand- alone TAB venues.

49

These measures would support a gradual reduction in access to harmful gambling environments, help reduce the inequitable burden of gambling harm, and align with the Council's role in promoting the health and wellbeing of South Taranaki communities.

Attached Documents

Name
NPHS Technical Advice STDC Gambling Policies Final (002)

5

07/10/2026

Health New Zealand
Te Whatu Ora

5

South Taranaki District Council
consultation@stdc.govt.nz

Tēnā koutou,

Technical Advice: Gambling Policies South Taranaki District Council

We **DO NOT** wish to speak in support of this advice.

This technical advice on South Taranaki District Council's proposed Class 4 Gambling Venues Policy and TAB Venues Policy has been compiled by the National Public Health Service (NPHS) Te Manawa Taki region, Health New Zealand | Te Whatu Ora (Health NZ). NPHS Te Manawa Taki services the Taranaki, Waikato, Bay of Plenty, Lakes and Tairāwhiti areas.

NPHS recognises its responsibilities to improve, promote and protect the health and wellbeing of people and communities of Aotearoa New Zealand under the Healthy Futures (Pae Ora) Act 2022 and the Health Act 1956. Achieving Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.

NPHS is focused on the achievement of equitable health outcomes. We use the Ministry of Health's definition of equity:

> *In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.*[1]

Medical Officers of Health[2] have a responsibility to reduce conditions within their local communities that are likely to cause injury and disease. Many of the crucial underlying factors that contribute to improving, promoting and protecting the health of people and communities are directly influenced by the decisions and activities of Councils.

We welcome the opportunity to share public health advice and evidence for planning and decision making with South Taranaki District Council. This technical advice sets out matters of interest and concern to NPHS Te Manawa Taki, and our recommendations are based on evidence about public health and equity, as well as the experience of local public health officers.

[1] Ministry of Health – Manatū Hauora (2024, July 2). Achieving equity. https://www.health.govt.nz/about-ministry/what-we-do/achieving-equity
[2] Health Act 1956, s 7a. Health Act 1956 No 65 (as at 27 August 2025), Public Act Contents – New Zealand Legislation

TeWhatuOra.govt.nz
Private Bag 2016, New Plymouth 4340
Waea pūkoro: +64 6 753 6139 6

Te Kāwanatanga o Aotearoa
New Zealand Government

Response to questions

NPHS commends South Taranaki District Council for their engagement with the community in the review of its Class 4 Gambling Venues, and TAB Venues policies.

Preferred option: Class 4 Gambling Venues Policy

NPHS supports **Option Two,** establishing a sinking lid policy in the South Taranaki District, with the following recommendation:

- Expanding Option Two to include a no relocations policy.

If relocations continue to be permitted, under any policy, NPHS makes the following recommendation to Section 3.0 ‘Relocations’.

- The criteria to be considered when assessing any applications should have a harm minimisation focus and include consideration of the social deprivation of the proposed location.

We also encourage the council to look for ways to take further steps to minimise harm from gambling, for example blocking online gambling websites on council public Wi-Fi networks.

Preferred option: TAB Venues Policy

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Specific Comments

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[3] Ministry of Health. (2025). Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Wellington: Ministry of Health.
[4] Ministry of Health and Health New Zealand – Te Whatu Ora. (2025). New Zealand Gambling Survey 2023/24 results. Available from: https://kupe.healthpromotion.govt.nz/nzgs/
[5] Ministry of Health and Health New Zealand – Te Whatu Ora. (2025). New Zealand Gambling Survey 2023/24 results. Available from: https://kupe.healthpromotion.govt.nz/nzgs/
[6] Browne M, Bellringer M, Greer N, Kolandai-Matchett K, Rawat V, Langham E, et al. (2017). Measuring the burden of gambling harm in New Zealand. Central Queensland University and Auckland University of Technology.
[7] Ministry of Health. (2025). Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Wellington: Ministry of Health
[8] Ministry of Health. (2025). Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. Wellington: Ministry of Health
[9] Adams, P. and Wiles, J. (2016). Gambling machine annexes as enabling spaces for addictive engagement. Auckland: Centre for Addiction Research. University of Auckland, New Zealand.
[10] Ministry of Health and Health New Zealand – Te Whatu Ora. (2025). New Zealand Gambling Survey 2023/24 results. Available from: https://kupe.healthpromotion.govt.nz/nzgs/

Why it is particularly relevant to South Taranaki - gambling harm inequity

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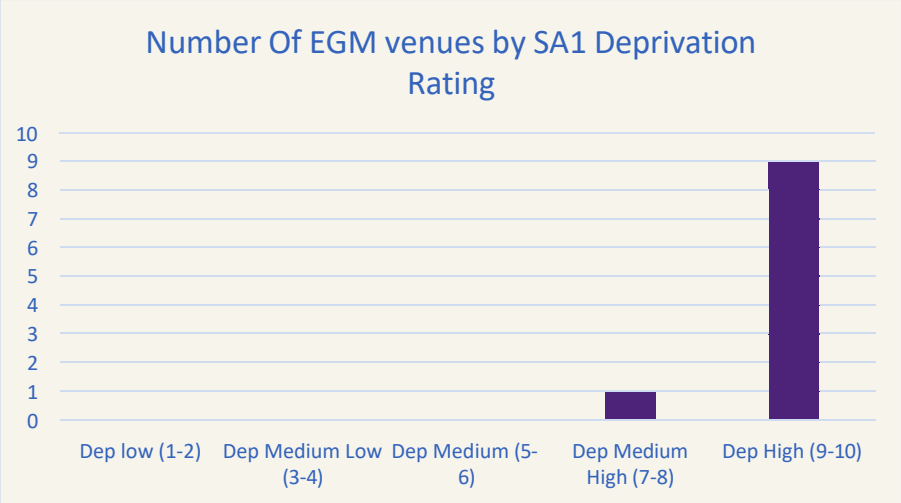


Figure 1 Adapted from: Department of Internal Affairs. (2026). Gaming machine profits (GMP) Quarterly Report – June 2026.

Across the community, 29.3% identify as Māori, and disproportionate number (72.6%) live in areas of medium high or very high deprivation[14]. These inequities make South Taranaki communities more vulnerable to gambling harm.

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[11] Ministry of Health and Health New Zealand – Te Whatu Ora. (2025). New Zealand Gambling Survey 2023/24 results. Available from: https://kupe.healthpromotion.govt.nz/nzgs/
[12] Department of Internal Affairs. (2026). Gaming machine profits (GMP) Quarterly Report – June 2026. Available from: Microsoft Power BI
[13] Department of Internal Affairs. (2026). Gaming machine profits (GMP) Quarterly Report – June 2026. Available from: Microsoft Power BI
[14] Infometrics. (2026). Regional Economic Profile South Taranaki District. Available from: https://regions.infometrics.co.nz/south-taranaki-district/census/drill-down

Why limit the number of electronic gaming machines

Gambling prevalence in South Taranaki

Across the South Taranaki region, there are 121 EGMs. Using DIA, census data, we calculate that South Taranaki has the highest number of EGMs per population in the Taranaki region, and 1.6 times as many EGMs per person as the national rate[15,16].

	Population size	Number of EGMs	Number of EGMs per 1000 people
South Taranaki	29,800	121	4.06
New Zealand	5,324,700	13,613	2.56

Distributions of Grants

Gambling machine operators are required by law to allocate a minimum 40% of proceeds back to community groups and organisations, but not necessarily to the community where the money was lost. The New Zealand Gambling Survey 2023/2024 found that 46.2% of respondents felt that raising money through gambling does more harm than good[17].

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[15] Department of Internal Affairs. (2026). Gaming machine profits (GMP) Quarterly Report – June 2026. Available from: Microsoft Power BI
[16] Statistics New Zealand. (2026). Place and ethnic group summaries. Available from: https://tools.summaries.stats.govt.nz/
[17] Ministry of Health and Health New Zealand – Te Whatu Ora. (2025). New Zealand Gambling Survey 2023/24 results. Available from: https://kupe.healthpromotion.govt.nz/nzgs/
[18] Department of Internal Affairs. (2026). Gaming machine profits (GMP) Quarterly Report – June 2026. Available from: Microsoft Power BI
[19] Department of Internal Affairs. (2025). Explore Pokie data – Grants by District. Available from: https://granted.govt.nz/dashboard
[20] Cox M, Hurren K, Nana G. (2020). Assessment of the effects of Class 4 gambling on wellbeing in New Zealand. Business and Economic Research Limited

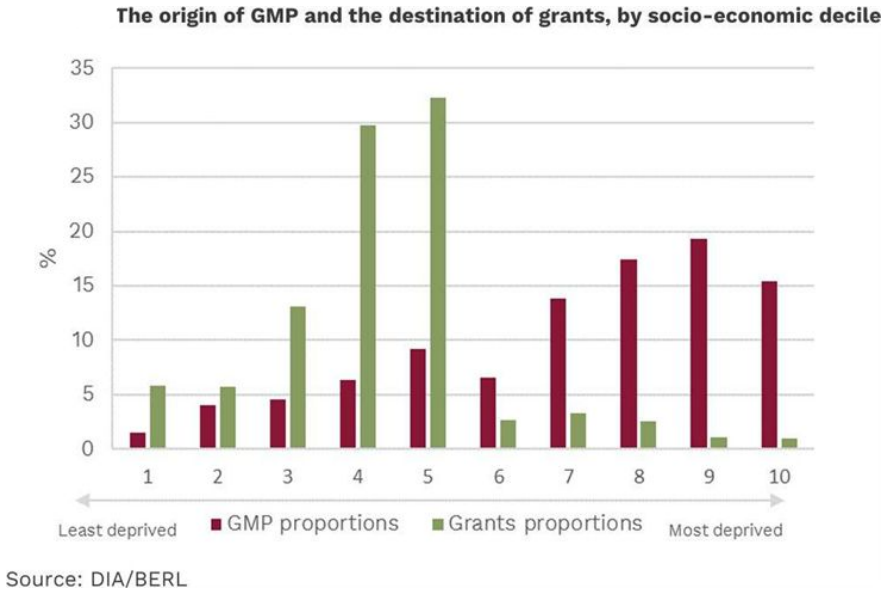


Figure 2 Source: Cox M, Hurren K, Nana G. (2020). Assessment of the effects of Class 4 gambling on wellbeing in New Zealand. Business and Economic Research Limited

Evidence for sinking lids

Sinking lid policies have been shown to be effective in reducing gambling expenditure[21]. While, a cap prevents further growth, a sinking lid creates a gradual sustainable reduction in access to harmful EGMs over time. Modelling indicates that such policies can reduce gambling expenditure by 13-14%. They are also associated with a reduction in the number of people seeking problem gambling services, with an estimated 36% drop in service use modelled[22].

A potential argument against a sinking lid policy is that people may shift from EGMs to online gambling, including less-regulated offshore sites. However, NZ evidence does not support substantial substitution. Evidence indicates that reduced Class 4 gambling losses are unlikely to be replaced by other forms of gambling (including online or illegal gambling) and are more likely to be absorbed into other household spending[23]. National survey evidence also suggests that offshore online gambling remains a minority behaviour in NZ, with only 3.6% of adults reporting gambling on overseas websites[24]. Qualitative research shows that some individuals may shift their gambling online[25].

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[21] Erwin, C., Lees, K., Pacheco, G. & Turcu, A. (2020) Capping gambling in NZ: The effectiveness of local government policy intervention. New Zealand Work Research Institute.
[22] Erwin, C., Lees, K., Pacheco, G. & Turcu, A. (2020) Capping gambling in NZ: The effectiveness of local government policy intervention. New Zealand Work Research Institute.
[23] New Zealand Institute of Economic Research. (2020). The Retail Employment and Tax Costs of Class 4 Gambling in New Zealand.
[24] Ministry of Health and Health New Zealand – Te Whatu Ora. (2025). New Zealand Gambling Survey 2023/24 results. Available from: https://kupe.healthpromotion.govt.nz/nzgs/
[25] Bellringer ME, Lowe G, Paavonen A-M, Preez KPd, Garrett N, Abbott M. (2019). New Zealand National Gambling Study: Qualitative phase. Auckland University of Technology, Gambling and Addictions Research Centre.

However, at a population level, a sinking lid policy is expected to reduce overall exposure and harm rather than drive people to other forms of gambling[26]. Fewer EGMs would mean households lose less money to gambling, which would lead to more income remaining in the community, spent on local goods and services.

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Maintaining the status quo of no standalone TAB venues permitted to be established or consented within the district avoids creating additional gambling opportunities and is supported by the NPHS. This is consistent with both a prevention approach to gambling-related harm, and promoting equity across the South Taranaki community

Final comments

Gambling harm has serious impacts and is inequitably experienced across communities. South Taranaki is made up of communities disproportionally impacted by gambling harm, and the region has the highest number of EGMs per population in the Taranaki region.

NPHS recommends that South Taranaki District Council strengthen gambling harm prevention by adopting a sinking lid policy for Class 4 gambling venues, with no relocations.

We commend the choice to retaining the current TAB Venues Policy that does not allow stand-alone TAB venues.

These measures would support a gradual reduction in access to harmful gambling environments, help reduce the inequitable burden of gambling harm, and align with the Council's role in promoting the health and wellbeing of South Taranaki communities.

Nāku iti nei, nā



Dr Inbal Salz
Medical Officer of Health for Taranaki
Health NZ National Public Health Service Te Manawa Taki

[26] Erwin, C., Lees, K., Pacheco, G. & Turcu, A. (2020) Capping gambling in NZ: The effectiveness of local government policy intervention. New Zealand Work Research Institute.

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Review of Gambling Policies

5

Submitter Details

Submission Date: 19/10/2026

First name: Martin Last name: Bradley

Organisation: Grassroots Trust Limited

Prefered method of contact Email

Would you like to present your submission in person at a hearing?

Additional requirements for hearing:

Feedback

Class 4 Gambling Venues Policy

Option 1 **the status quo** **Preferred option.**	The existing Policy regarding the establishment and relocation of venues and the numbers of gaming machines remains unchanged. There would continue to be a limit of nine gaming machines per venue and a total of 121 machines in the District. Class 4 gambling venues may be established in venues for the sale of alcohol or alcohol and food, sporting activities or club activities, provided the venue is allowed under the District Plan and is not associated with family activities.
Option 2	The establishment and relocation of venues and the maximum number of machines per venue remain unchanged but a 'sinking lid' policy for the total number of gaming machines would be applied over part or all of the District. A 'sinking lid' policy means if an existing venue is disestablished or stopped having gaming machines, a new venue would not be allowed to take on those machines. As a result, the number of gaming machines in the District would reduce over time.
Option 3	No restrictions on the numbers of gaming machines at venues or throughout the District. This option would place no limits on the numbers of machines per venue or the total number in the District, although locations would remain subject to the District Plan. This option is unlikely to be seen as meeting one of the purposes of the Gambling Act 2003, which is to prevent and minimise harm from gambling, including problem gambling.

Option 1 (preferred option) - I agree that the existing policy regarding the establishment and relocation of venues and the numbers of gaming machines should remain unchanged.

Which area(s) should it apply to?

Do not support a Sinking Lid Policy

Please state the areas where trading should occur and why.

N/a

Your Comments

Grassroots Trust supports the retention of a Capped Policy however requests Council to consider raising the capped number of gaming machines to 139 - please see full submission document attached.

50

Attached Documents

Name
Grassroots Trust_Submission to South Taranaki District Council

5

19 October 2026

South Taranaki District Council
Private Bag 902
Hawera 4640

GRASSROOTS TRUST – SOUTH TARANAKI DISTRICT COUNCIL GAMBLING VENUE POLICY REVIEW

Introduction

The Grassroots Group (Grassroots) is the fourth largest Class 4 Operator in New Zealand. The group's governing boards share a common purpose and goal with an overarching mission ***To Provide Local Funding To Local Communities***.

The **Grassroots Trust Limited** Board of Directors are: Executive Chairman, Martin Bradley (former Lawyer); and Directors, Kevin Burgess (Pharmacist), Jeremy O'Rourke (Managing Director), Fraser Lellman (Managing Director), John Young (Lawyer), and Patrick O'Rourke (Accountant).

The **Grassroots Trust Central Limited** Board of Directors are: Chairman, Sean Hannan (Independent Director); and Directors, Kath Grieve (Business Consultant), Mike Knobloch (Chartered Accountant), Andrew Lockyer (International Sales Executive), and Martin Bradley (former Lawyer).

Grassroots is supportive of positive legislation changes within the industry and all efforts to further minimise harm that is caused by gambling. Grassroots is committed to ensuring an effective Harm Prevention & Minimisation Programme, ensuring they safeguard vulnerable individuals and communities from potential gambling harm. Our systems, and harm prevention & harm minimisation training are considered industry leading, and we pride ourselves on ensuring we use the latest technology available to the industry.

Summary Feedback

Grassroots appreciates the opportunity to provide feedback on South Taranaki District Council's Gambling Venue Policy review and encourages Council to consider a balanced approach to reviewing the social and economic impacts of Class 4 gaming within the South Taranaki District community.

1. **Supporting the Retention of a Gaming Machine Capped Policy**

   Grassroots **SUPPORTS** Option 1, the **retention of a gaming machine capped policy,** however recommends that Council consider a **cap of 139 gaming machines** (a cap that allows for a small amount of additional growth – two 9 gaming machine venues).

   A capped gaming machine policy strikes an appropriate balance between harm minimisation and the continued ability for community groups, charities, and sporting organisations to access much needed funding, critical to the sustainability of local sport, arts, cultural, and welfare organisations that would otherwise struggle to operate.

   Grassroots also **SUPPORTS** the **retention of the relocation provisions** within the current policy. A status quo relocation policy is sensible.

This provision ensures that venues affected by lease changes, redevelopment, or natural disasters have a pathway to continue operating in appropriate locations. Without such a provision, communities risk losing significant funding and local employment simply due to circumstances beyond the operator's control.

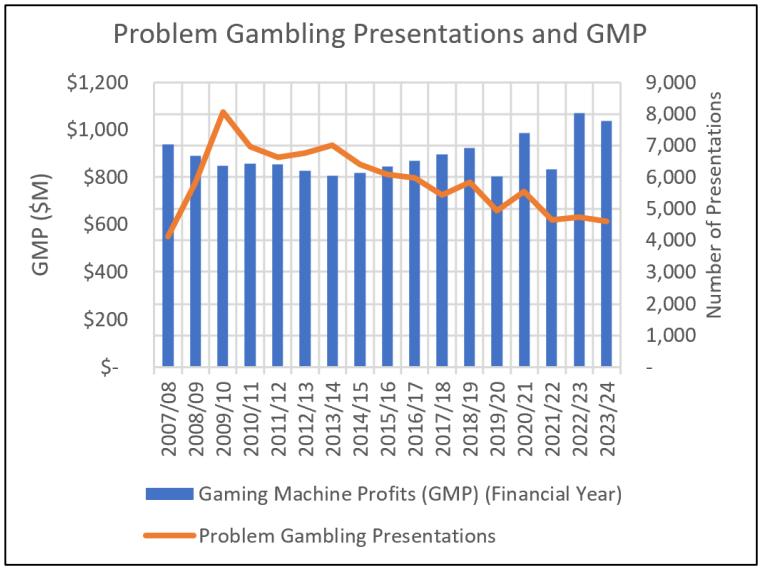
Relocation provisions also provide flexibility while still allowing the Council to ensure venues are located in suitable areas consistent with policy objectives and harm minimisation principles. Venues can relocate out of a high deprivation areas to lower deprivation areas and often such moves are to new, modern, refurbished premises allowing local business to upgrade and provide a more modern & attractive offering, revitalising business districts and improving local economy and tourism.

2. Sinking Lid Policies are Ineffective

Grassroots **DOES NOT SUPPORT** Option 2, the **introduction of a Sinking Lid Policy**.

Sinking Lid Policies are ineffective. There is no evidence that reducing gaming machines will reduce gambling expenditure. There is also no proof that sinking lid policies reduce problem gambling. Reducing machine numbers has been tried as a tool to address gambling-related harm but it has not worked. Reducing gaming machine numbers, reduces community funding and accelerates the migration to online gambling with minimal return to the community.

Source: DIA website: https://catalogue.data.govt.nz/dataset/class-4-gambling-keyperformance-indicators/resource/4893f532-b4b8-4966-b33cde3836817a49?inner_span=True



Local gaming machine numbers have remained unchanged since March 2015. Prior to this gaming machine numbers were declining.

The South Taranaki District has a very low level of Problem Gambling presentations. Presentation data[1] for South Taranaki shows that in 2022/23 (latest available statistics) there were no new clients and only a total of 3 clients seen.

3. A less restrictive policy

Grassroots **DOES NOT SUPPORT** Option 3, no restrictions on the numbers of gaming machines at venues or throughout the District**.**

[1] https://www.health.govt.nz/monitoring-statistics/statistics-and-data-sets/gambling-harm/gambling-harm-services-data#toc-0-1

Grant Funding

Class 4 Gaming Venues enable extremely valuable funding to be provided to a large range of local community groups. In 2025, **$340.38 million in gaming machine funding** was provided to **9,420 community organisations** across New Zealand[2]. Many organisations throughout New Zealand including the South Taranaki District have benefited from this funding.

The Grassroots funding turnaround is quick, and the application process for community groups is simple, through our online website portal. For the year ending March 2026, Grassroots was extremely proud to return **$27.7m** to community organisations (including the South Taranaki District), supporting arts & culture, community, education & schools, environment & health and sports.

Class 4 Gaming Societies are the only gambling operators that focus on supporting grassroots community organisations, making a positive difference to many community organisations, which would struggle to survive without this funding. No other type of gambling provides this level of support for community organisations and there is no easy substitute for this funding which is critical to their ongoing sustainability. The Lottery Grants Board makes a small number of large grants to large organisations. The New Zealand Racing Board predominately uses the funds from race and sports betting to support the racing industry. The profits from the six commercial casinos are paid out to their commercial shareholders (save for a token amount in community grants).

Gambling is an Enjoyable Activity

Gambling is a popular form of entertainment that most New Zealanders participate in. The 2025 New Zealand Gambling Survey[3] found that 64.41% of adult New Zealanders had particiapated in some from of gambling in the previous 12 months. Gambling for the non-addicted gambler may be an avenue for socialising, stress relief and a way of having fun. Contrary to how it may appear from a non-gambler's perspective, gamblers do not necessarily anticipate they will make money from gambling.

Revenue Breakdown

The return to players on a non-casino gaming machine is required to be set between 78% - 92%. On average, for every $1 gambled, 91.5 cents are returned to the player in winnings. The money retained is typically allocated as follows:

	GST Inclusive	GST Exclusive
Government Duty	20%	23%
GST	13.04%	0
Problem Gambling Levy	1.08%	1.23%
DIA Costs	2.9%	3.33%
Gaming Machine Depreciation	6.95%	8%
Repairs & Maintenance	2.84%	3.27%
Venue Costs	13.9%	16%
Society Costs	1.74%	2%
Donations	37.53%	43.16%

Key Facts & Problem Gambling Statistics

Gaming Machines have been present in New Zealand communities since the early 1980s, initially operating without a licence.

New Zealand has a very low problem gambling rate by international standards. The March 2025 New Zealand National Gambling Survey[4] found that the combined rate of moderate risk gambling and problem gambling was 2.4% of the adult population (aged 15+).

[2] https://www.granted.govt.nz/index.html

[3] https://kupe.healthpromotion.govt.nz/nzgs/participation-frequency-and-expenditure/any-gambling/anygambling-activity/

[4] https://kupe.healthpromotion.govt.nz/nzgs/gambling-harm/problem-gambling-severity-index/

A subsequent OIA request[5] revealed that this was comprised of 0.5% problem gambling and 1.9% moderate risk gambling. The problem gambling rate is for all forms of gambling, not just gaming machine gambling.

Class 4 Operators provide significant funding of over $25 million per annum to the Ministry of Health through an annual Problem Gambling Levy. This funding goes towards problem gambling support services nationwide (including the Problem Gambling Foundation & Gambling Helpline), to support and treat gambling addition and to increase public awareness.

An excellent, well-funded problem gambling treatment service exists. The problem gambling helpline is available 24 hours a day, 365 days per year and provides free, confidential help in 40 different languages. Free face-to-face counselling is also available, and specialist counselling is available for Maori, Pasifika and Asian clients. An anonymous free text service (8006) and support via email is also available (help@pgfnz.org.nz).

Commitment to Responsible Gambling

Grassroots aims to provide an environment that supports responsible gambling, understanding that although for some people gambling is a form of entertainment, for others there are some harmful effects. Grassroots provides significant on-going training on how to identify the signs of gambling harm, information on the problem gambling services available, and the exclusion order process. Our dedicated and experienced field team are available at any time to provide training and support to venue personnel.

Class 4 Operators are heavily regulated by the Department of Internal Affairs and adopting more restrictive policies are not necessary given the significant measures that are already in please to minimise the harm from gaming machines.

Class 4 Operators spend in excess of $3-4 million annually on harm prevention and minimisation initiatives such as training, compliance, administering the exclusion order process and software development. Facial Recognition technology is now widely used, providing huge positive benefits to the industry, assisting venue personnel to supervise & monitor gaming rooms and helping to reduce problem gambling relapse amongst individuals. The technology uses high-definition cameras to assist with identifying problem gamblers who may be in breach of their exclusion order.

Regulations require that venue personnel are trained to monitor, identify and support problem gamblers and Grassroots recognises that face-to-face interaction with gamblers is the most effective way of helping a very small proportion of people who have a problem, to manage that problem, whilst leaving the greatest proportion of people to fulfil their legitimate desire to gamble responsibly.

Venue Personnel must conduct gambling area sweeps three times per hour, track cash withdrawals for gambling purposes, maintain detailed record keeping for all gambler interactions & conversations, and conduct weekly venue manager reviews.

Unintended Consequences of Reducing Gaming Machines

A reduction in land-based gaming machines only redirects gamblers away from a controlled environment, leading to a migration of the gambling spend to offshore internet & mobile-based offerings (online gambling). While it is illegal to advertise overseas gambling in New Zealand, it is not illegal to participate in gambling on an overseas-based website or mobile phone application.

Online gambling lacks control and sees gambling expenditure redirected offshore, with no profits mandated by law to be returned in the form of grants to the community. It now takes only a simple search and a few minutes to download to your computer, tablet, or mobile phone any type of casino game, including an exact replica of the gaming machines currently available in New Zealand venues.

[5] https://www.gamblinglaw.co.nz/download/OIA_Problem_Gambling_Rate_March_2025.pdf

Online gambling poses considerable risks because it is:

- Highly accessible 24 hours a day from the comfort & privacy of your home;
- Has no restrictions on bet sizes;
- Has no capacity for venue staff to observe and assist people in trouble;
- Reaches new groups of people who may be vulnerable to the medium;
- Provides no guaranteed return to players;
- Is more easily abused by minors;
- Has reduced protections to prevent fraud, money laundering or unfair gambling practices; and
- Is currently unregulated, so online gamblers are often encouraged to gamble more by being offered inducements or by being offered the opportunity to gamble on credit. For example, many overseas sites offer sizable cash bonuses to a customer's account for each friend they they induce to also open an account and deposit funds.

Offsore-based online gambling currently does not generate any community funding for New Zealanders, and currently does not make any contribution to the New Zealand health & treatment services, as no contribution is made to the Problem Gambling Levy.

The Government has confirmed its decision to regulate online casino gambling and begin issuing online gambling licenses from 1 December 2026. The introduction of a licensing system will allow offshore-based online providers to market and advertise more freely, which is expected to drive significant growth. However, only 4% of the gross revenue will be allocated to community grants. These providers are likely to be entirely based offshore, resulting in no local employment and all profits being removed from New Zealand.

The November 2025 Historical Market Report[6] estimated the New Zealand online gambling market (both sports betting and online casino gambling) to be $1.36b:



The November 2025 Historical Market Report[7] also found that the New Zealand online gambling market is expanding both in breadth (more customers) and depth (more transactions per customer, and higher spend per transaction). Market spend was up 10.5% in the year to September 2025:

[6] https://www.gamblinglaw.co.nz/download/2025-New-Zealand-Market-Insights-Report-Historical-Market-Analysis.pdf
[7] https://www.gamblinglaw.co.nz/download/2025-New-Zealand-Market-Insights-Report-Historical-Market-Analysis.pdf



The November 2025 User Behaviour Report found that in the year ended September 2025, 360,000 individuals participated in online, offshore gambling:



The migration from physical Lotto stores and SkyCity was apparent during the Covid-19 lockdowns. When the physical venues were losed, the number of online registered players, and the amount of online revenue, skyrocketed.

Council Conflicts of Interest

It is important that the elected members that determines the gambling venue policy reflects the full views of the community. It has however, become common for councillors who are involved in community and sporting groups to withdraw from the gambling venue deliberation as they consider the receipt of funding by a group that they are associated with constitutes a conflict. It has been common for councillors with very strong, pre-determined anti-gambling views to refuse to withdraw from the policy deliberation, despite their strongly held views.

Being a member of a club or organisation that receives funding from a gaming grant should not give rise to a conflict of interest when it comes to deciding or discussing Council's gambling venue policy, unless that member holds a paid role i.e. a coach who is paid for that service.

Additionally, where an elected member, outside of a debate on the issue, has expressed a view on the gambling venue policy that suggests that they do not and cannot have an open mind on the matter, this could give rise to a conflict of interest on the grounds of predetermination.

Summary of Position

Grassroots encourages the South Taranaki District Council to retain a policy that balances harm minimisation with the ongoing delivery of substantial community benefit. In summary, Grassroots:

- **Supports:** Rentention of a Capped Policy at 139 Gaming Machines (a cap that allows for a small amount of additional growth – two 9 gaming machine venues).
- **Supports:** The retention of Relocation provisions.
- **Does Not Support:** The introduction of a Sinking Lid Policy

Grassroots looks forward to continuing its support of New Zealand communities, ensuring that sport, education, and community organisations in the region continue to receive the valuable support that they all require.

Kind regards
On behalf of Grassroots Trust Limited



Martin Bradley
Executive Chairman

Te Kaunihera ō Taranaki ki Te Tonga
South Taranaki District Council

Karakia

6. Karakia

Ruruku Whakakapi – Closing Prayer

Unuhia, unuhia	*Draw on, draw on,*
Unuhia ki te uru tapu nui	*Draw on the supreme sacredness*
Kia wātea, kia māmā te ngākau, te	*To clear, to free the heart, the body and the*
tinana, te wairua i te ara takatū	*spirit of mankind*
Kia wātea, ka wātea, āe rā, kua wātea	*To be clear, will be clear, yes is cleared.*
Rire rire hau pai marire!	*Deeply in peace!*