



InterChurch Gambling Taskforce

Submission to the Legislative Council Select Committee Inquiry into Gaming Licensing in Victoria

02 APR 2007

The Secretary
Select Committee on Gaming Licensing
Legislative Council
Parliament of Victoria
Spring Street
Melbourne, Victoria, 3000

The InterChurch Gambling Taskforce would like to thank the Select Committee on Gaming Licensing for this opportunity to make submission to the *Inquiry into Gaming Licensing in Victoria*.

The Taskforce would also welcome the opportunity to appear before the Legislative Council Select Committee to speak to its submission.

InterChurch Gambling Taskforce

The InterChurch Gambling Task Force was established in 1996 by the Heads of Churches in Victoria with the following objectives:

1. To increase awareness amongst the Churches about the broadening gambling industry and to potentially harmful effects on the common good.
2. To provide critical analysis and interpretation of research on gambling and the gambling industry, in particular the social and economic impacts and any other projects undertaken by the government, the Victorian Casino and Gaming Authority and the gambling industry.
3. At every level to communicate the alternatives to gambling as a solution to
 - a) individual personal problems
 - b) socio-economic development.
4. To call Government to further account for its integration of the gambling industry into its economic management.

New Licences must not restrict Harm Minimisation and Community Benefit

The Taskforce has been concerned that the existing gaming operator licenses have restricted the Victorian Government from introducing legislation and regulation to reduce the harm caused to the community by electronic gaming machines (EGMs). It is the view of the Taskforce that the new licences must ensure that the Government is free to regulate the industry to minimise the harm caused by EGMs and to maximise the benefits to the community from allowing EGMs to operate. The licences in no way should restrict the Government from legislating and regulating the number of EGMs in Victoria, their distribution, their design and the operation and layout of the gaming venues themselves. The licences should not create any legally binding expectation of minimum levels of revenues from EGMs. The licences must not have in-built clauses that make it difficult for a future Government to change the operators or get rid of the operators altogether when the licences

again come up for renewal, assuming that the Government does not cease to have operators when the current licences expire. The InterChurch Gambling Taskforce is strongly opposed to the future licences containing clauses that exist in the current licences that require the Government to pay TABCORP an amount equal to the licence value of the former licences or the premium payment paid by the new licensee, whichever is the lesser.

(c) The conduct, processes and circumstances (including but not limited to the probity thereof) pertaining to post-2012 Electronic Gaming Machine (EGM) operator licensing in Victoria pursuant to the Act, and any related matter.

The Taskforce had welcomed the opportunity to make submission to the *Review of the Electronic Gaming Machine, Club Keno and Wagering Licences and Funding Arrangements for the Racing Industry Post – 2012* and to appear before the panel conducting the review.

However, the Taskforce has been concerned that the Government will offer no further opportunity for public comment on the final options the Government will consider for the structure of the industry in the post 2012 period. This seems at odds with the statement issued by the previous Minister for Gaming.

(d) The adequacy or otherwise of the legislative and regulatory framework pertaining to the number, location, distribution and specification of EGMs in Victoria and any related matter.

The InterChurch Gambling Taskforce believes that the Victorian Government should change the structure of the EGM industry to one of two options:

- Either get rid of the gaming operators from the system, allowing venues to purchase, own and trade in EGMs¹; or
- Allow for the operators to continue, but without gaining a share of the EGM revenue. Instead each venue would pay a fixed licence fee to the operator per EGM, that would take into account the costs of providing the EGM (which would continue to be owned by the operator) and a reasonable profit margin on top of the costs.

The Taskforce has been deeply concerned at the finding of the 2000 National Competition Policy Review of Gaming Machine Legislation by Marsden Jacob Associates that the current system of two operators has allowed the two operators to extract excessive monopoly rents. The Taskforce believes that this ability to extract excessive monopoly rents has contributed to operator behaviour that has increased the level of problem gambling in the state and at the same time has reduced the benefits to the wider community from allowing legal EGMs in the community.

The share in EGM revenue that goes to the operators means that the operators have a vested interest in maximising EGM revenue, creating a conflict of interest with measures to reduce problem gambling. This means that under the current arrangements there will always be a tension for the operator between the desire to maximise EGM revenue at any level of social cost to the community and on the other hand seek to promote responsible gambling and

¹ Any trade in EGMs would be within a strict system of licence venues that set the maximum number of EGMs a particular venue could have. Any movement of EGMs would still be subject to approval by the Victorian Commission on Gambling Regulation and such movement would need to prove no net negative social or economic impact, with Local Government and local community groups being able to have input into the decision.

minimise problem gambling. As long as the operators get a share of the revenue this tension will exist and serves to encourage the operators to do the minimum required of them in legislation and regulation to reduce problem gambling and promote responsible gambling behaviours.

The ability to remove up to 20% of venue EGMs per year means that the operators are able to compel venues to maintain high levels of revenue, possibly stifling venues from introducing responsible gambling measures that would reduce problem gambling (although the evidence from other Australian states does not indicate that many venues are willing to voluntarily take measures that would reduce problem gambling that would reduce revenue at the same time).

The current arrangement fails to adequately spread the community benefits from having licensed EGMs across the community. Pubs and clubs that do not have EGMs are placed under increased competition, as revenue from EGMs is used to subsidise other parts of the venue's business, such as meals and the sale of drinks. This can result in an unfair competitive edge over other local pubs and clubs. The Taskforce would prefer to see venues getting a much lower share of the revenue from EGMs with much more going to the Community Support Fund.

The Taskforce believes that the proportion of revenue to venues should be cut to 20% for all venues. This again is a measure to ensure EGM venues are limited in their ability to use EGM revenue to cross-subsidise other parts of their business (such as meals and drinks) to drive out of business local competitors without EGMs. Driving local competitors out of business is a loss to that community.

With the cuts in the proportion of revenue to venues and no proportion of revenue going to EGM operators (as if they exist they get a fixed licence fee), Government can increase its proportion of the revenue taken from EGMs. The Taskforce would then expect that Government would be willing to introduce more serious measures to reduce problem gambling, which would mean a reduction in total EGM revenue. However, with Government getting a greater share of the revenue, it should be possible that any reduction in revenue as a result of measures to seriously reduce EGM related problem gambling would not result in a reduction in revenue to Government.

The Taskforce continues to believe that in the medium term the Victorian Government should be seeking to pursue other revenue raising measures to reduce dependence on EGM revenue, so that it will be willing to introduce all reasonable measures to minimise harm to the community from EGMs and that revenue reduction is not a barrier to such measures. The Taskforce has already outlined a number of suggestions for alternative sources of revenue in its *Breaking a Nasty Habit* report.

Accessibility of EGMs

The Taskforce, along with most community agencies dealing with the fallout from gambling problems, recognises that accessibility is a key issue which must be minimised if Victoria is to achieve a more responsible EGM environment. Convenience gambling needs to be eliminated for obvious access reasons but also because there is little support for it and no net economic gain as it simply shifts discretionary spending from existing businesses into the EGM enterprise. The Taskforce therefore believe any distribution of machines considerations must consider maximising the restriction of venues to relatively isolated areas that require a deliberate choice by a person to visit the EGM venue, rather than entering because it

happened to be handy. It would prefer that EGM venues be located outside of built up areas or areas with an already higher than average concentration of machines.

Preference should be given to locating EGMs in venues that have demonstrated higher compliance and willingness to comply with measures to ensure harm minimisation and a safer gambling environment.

The Taskforce has previously indicated support for the idea of removing EGMs from pubs, based on the belief that, on balance, a club is more likely to deliver benefits back to the community. However, the Taskforce recognises that the location of many clubs presently, makes them convenience venues also.

In principle, we support a higher than 50% allocation of machines to clubs, moving to an initial figure of 80%. Any increase would be subject to the clubs demonstrating their commitment to implement a range of measures to enhance responsible gambling.

However, at the same time EGM club venues would be required to be out of built up areas.

EGM venues should be required to remain out of new and developing areas at least for a proscribed number of years in which the community is developing. This would allow appropriate community facilities to be established without the EGM venues gaining a hold on a newly arrived community. The Taskforce would also want to ensure that no venues would be abutting or in close proximity to areas of high pedestrian traffic such as railway stations or shopping centres.

Monitoring

Monitoring of EGMs should be removed from the hands of the operators and should be done either directly by Government or by a Government contractor with no interest in the revenue from EGMs. Ideally no private body that has a share in the EGM revenue should have access to the on-line real-time data for each EGM. This would make it slightly more difficult for the EGM industry as a whole to use data from each EGM to determine how to maximise EGM revenue, with the risk of maximising problem gambling at the same time, within what the current legislation and regulation allows.

The current monitoring arrangements means the operators have had access to detailed information on gambling behaviour of patrons at EGM venues, allowing them to use this information to implement measures to maximise EGM revenue. The same information has not been available to policy setters in Government, to researchers employed by the Government or to community groups concerned about the harm EGMs are causing.

Information obtained from monitoring should be readily available to staff in the Gambling Policy Unit of the Department of Justice to assist them in analysis to inform policy making. Further, the information from monitoring should be available to researchers contracted by Government, provided such researchers agree not to disclose information that would commercially disadvantage one venue with regard to other venues or one operator with regard to other operators.

Length of Licences

The Taskforce believes that the profit and revenue margins on EGMs are sufficiently high that venues and any operators do not need long licences to ensure that there is cost recovery

on any capital outlays and start-up investments associated with owning and operating EGMs. It is the Taskforce's understanding that a new EGM 'box' costs in the order of \$20,000 and that it is depreciated over three years. Therefore the Taskforce would prefer that operator and venue licences last only five years, allowing the Victorian Government greater flexibility to vary licences over time to be greater benefit of the Victorian community.

By comparison with another sector, the Taskforce notes that aged care facilities require very high capital outlays and government only allows such facilities to be accredited for three years at a time.

Longer gaming licences allow the gambling industry greater certainty, but can also create a culture in the gambling industry bodies of indifference to the implementation of responsible gambling measures. If a licence lasts 20 years, why would an operator worry if their culture matches government and community expectations of providing the gambling product in a responsible way for the first 10 or 15 years of the licence? The certainty of the licence can make the gambling body indifferent to community expectations and to harm and suffering their product may be causing to members of the community. The industry only becomes focused on complying with what legislation and regulation requires of them.

A shorter licence gives the Victorian Government greater leverage over the gambling industry bodies, with knowledge that the licence can be varied more frequently or even lost for poor performance. There should be clauses built into the licences that allow for rapid termination of the licence in serious circumstances due to unconscionable conduct or sustained unfair or inappropriate practices.

The Taskforce notes the experience of The Netherlands that legalised EGMs in 1988. This led to a significant increase in the number of people with gambling problems from several thousands to between 100,000-200,000. In early 1994, the Dutch Parliament called for the removal of all 64,000 EGMs in all stores and other neighbourhood facilities by 1998. This provides an example where a larger number of machines than exist in Victoria were removed from a community within a four year period.

Measures to Reduce the Rate of Loss on each EGM

In Victoria a cap of 30,000 electronic gaming machines (EGMs) has been put in place as a harm minimisation strategy. However, the providers of the EGMs, TABCORP, Tattersall's and Crown have taken advantage of there being limited restriction on machine design to circumvent the purpose of the cap in minimising the level of problem gambling in the State.

One way to seek to reduce the level of problem gambling is to restrict the amount of money that can be lost on a machine each hour. The lower the maximum amount that can be lost per hour, the greater the likely reduction in problem gambling. The Productivity Commission report found that people with gambling problems played EGMs more intensely than other gamblers, being more likely to play multiple lines and multiple credits per line².

² Productivity Commission, "Australia's Gambling Industries", Report No. 10, AusInfo, Canberra, 1999, pp. 16.78-16.81.

Australian EGMs have a maximum average loss per hour of A\$720, compared to A\$186 in Canada on Video Lottery Terminals, A\$156 in New Zealand for machines outside of the casino and A\$130 in the United Kingdom.³

Reducing the amount lost per hour on each EGM is of benefit to consumers as it decreases the cost to them per hour of play, using the concept that playing EGMs is about consumers buying recreation time.

As pointed out by the Productivity Commission, the denomination of the machine itself does not necessarily give an indication of how much can be lost per hour⁴. The Productivity Commission found that for the two cent Cash Chameleon EGM the maximum loss per hour could vary from \$566.64 with a player return of 92.13% to \$1069.20 with a player return of 85.15%.

Comparing Australia to the UK, the level of problem gambling is estimated at 0.8% of the adult population. This is about a third of what it is in Australia (using a SOGS score of 5+ to indicate problem gambling behaviour)⁵. The UK has 'fruit machines', the British equivalent of EGMs, which cannot be played as intensely as Australian EGMs and do not have large payouts. The British study of gambling behaviour did not list fruit machines as one of the gambling types responsible for the highest prevalence of problem gambling, compared to Australia where the Productivity Commission found that 23% of weekly EGM players had gambling problems (as measured by a SOGS 5+ score)⁶.

(e) The effectiveness or otherwise of current measures to minimize and address the incidence of problem gambling in Victoria, the merits of alternative measures and any related matter.

The Taskforce is of the view that the Victorian Government should implement the following set of harm minimisation measures. These are categorised into measures that:

- reduce the rate of loss on each EGM;
- reduce ready access to cash in gambling venues;
- rely on cognitive decisions by the gambler; and
- curb any further increase in EGM related problem gambling.

The package is summarised in the table below.

However, some of the measures in the table will be more effective at reducing harm from electronic gambling machines than others. Thus, the four key measures that should be given highest priority are:

- Removal of ATMs from gambling venues;
- Ban on note acceptors;
- Introduction of smart cards to facilitate pre-commitment, promote responsible gambling behaviour and increase the effectiveness of self exclusion measures; and

³ Caraniche Pty Ltd, "Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria", Victorian Gambling Research Panel, Office of Gaming and Racing, Victorian Government Department of Justice, Melbourne, Victoria, December 2005.

⁴ Productivity Commission, 1999, pp. U.4-U.6.

⁵ Gamcare, "Gambling Behaviour in Britain. National Gambling Prevalence Study", 8 June 2000.

⁶ Productivity Commission, "Australia's Gambling Industries", Report No. 10, AusInfo, Canberra, 1999, p. 6.1, p. 6.54.

- Legislation for any change to EGMs proposed by industry to be researched and permitted only if it can be proved that it will not increase the level of problem gambling.

The Taskforce continues to believe that Victoria has too many EGMs, a view shared by the vast majority of the Victoria population in surveys over a number of years. The Taskforce continues to believe that the number of EGMs in Victoria should be reduced from 30,000 to 15,000.

Table 1. Program of measures to significantly reduce EGM related problem gambling.

MEASURES TO REDUCE THE RATE OF LOSS ON EACH EGM
<ul style="list-style-type: none"> • Ban on note acceptors; • A maximum bet limit of \$1 per button push; • Reduction in the maximum number of lines that can be bet on to six; • Reduction in the maximum number of credits that can be bet per line to four; • Mandatory breaks in play, where the EGM might bring up on line questions to help inform the gambler of how the EGM works and the likely rate of loss by playing. • One EGM per player; • Prohibition on linked jackpots; • Removal of the double-or-nothing feature; • Limiting the opening hours of the gaming area.
MEASURES TO REDUCE READY ACCESS TO CASH IN GAMBLING VENUES
<ul style="list-style-type: none"> • Removal of ATMs from gambling venues; • Paying winnings over \$250 entirely by cheque.
MEASURES THAT RELY ON COGNITIVE DECISIONS BY THE GAMBLER
<ul style="list-style-type: none"> • Provision of on-line warnings and statements of the likely rate of loss on each EGM; • Introduction of all EGMs being card or USB key operated where limits can be set on the amount of money that can be lost and warnings can appear if the rate of loss exceeds a certain value; • Monthly activity statements through card or USB key operated EGMs; • Training venue staff to intervene appropriately when it appears a gambler does not understand how EGMs work; • Training venue staff to intervene when gamblers show signs of problem gambling behaviour; • Provision of easily accessible telephones for gamblers in venues to make calls direct to Gamblers' Help; • 24 hour counselling services via telephone access; • Posters and brochures in venues stating the signs of a developing gambling problem (Low impact); • Self-assessment tool in venues for gamblers to determine if they may have a gambling problem (Low impact); • Posters and brochures in venues highlighting common cognitive misperceptions of playing EGMs (Low Impact); • Improving self-exclusion from venues with a high likelihood of people that have self-excluded being detected and removed from venues (Low Impact); • Increase in the visibility and prominence of problem gambling counselling signage (Low Impact).
MEASURES TO CURB FURTHER INCREASES IN EGM RELATED PROBLEM GAMBLING

- Legislation for any change to EGMs proposed by industry to be researched and permitted only if it can be proved that it will not increase the level of problem gambling

Note Acceptors

Note acceptors should be removed from EGMs, as is the case in South Australia and for Tasmanian and the Northern Territory in clubs and hotels. In Queensland EGMs can only accept \$20 banknotes with a maximum of five banknotes at a time. Such a measure would help slow down the intensity of play for people with gambling problems, and would have the added benefit of giving consumers more time for their expenditure. People would be forced to take a break to change money into coins to continue to play.

Comparing overall problem gambling levels between Victoria, South Australia and the Northern Territory indicates that the level of problem gambling is lower in the states without note acceptors (Table 1).

Table 2: Problem gambling levels in Victoria, South Australia and the Northern Territory as measured by the Productivity Commission⁷.

State or Territory	SOGS 10+%	SOGS 5+%	Dickerson method %	HARM %
Victoria	0.35	2.14	0.82	2.05
South Australia	NA	NA	1.38*	1.44
Northern Territory	0.10	1.89	0.77	1.24

*The Productivity Commission warns the high figure here is probably a result of sampling error.

A 2001 study by Blaszczyński *et al.* found that limiting note acceptors to \$20 would lead to a 42% reduction in expenditure among EGM gamblers and would not impact on the enjoyment of people without gambling problems.⁸ This report was reviewed by an independent group commissioned by the New South Wales Department of Gaming and Racing. The report argued that a 42% reduction in revenue would most likely have an impact on problem gambling and that further investigation into note acceptors was warranted to determine if restrictions on them would be a potential harm minimisation measure.⁹

A 2004 study in the ACT found that more than one-third of regular EGM gamblers and one-half of self-identified problem gamblers always used banknote acceptors when playing EGMs. Less than one-in-five self-identified problem gamblers did not use this facility.¹⁰ The study also established that EGM gamblers using banknote acceptors on a more frequent basis tended to use larger denominations than those using them only rarely or sometimes. Similarly, regular EGM gamblers and people with gambling problems who used this facility tended to use larger denominations than recreational gamblers.

⁷ Productivity Commission, "Australia's Gambling Industries", Report No. 10, AusInfo, Canberra, 1999, p. 6.46.

⁸ Blaszczyński, A., L. Sharpe and M. Walker, "The Assessment of the Impact of the Reconfiguration on Electronic Gaming Machines as Harm Minimisation Strategies for Problem Gambling", University of Sydney Gambling Research Unit, November 2001.

⁹ Tse, S. R. Brown and P. Adams, "Assessment of the Research on Technical Modifications to Electronic Gaming Machines in New South Wales, Australia", Report for New South Wales Department of Gaming and Racing, Sydney, 2003.

¹⁰ McMillen, J., D. Marshall and L. Murphy, "The Use of ATMs in ACT Gaming Venues: An Empirical Study", Report for the Australian Capital Territory Gambling and Racing Commission, Australian National University Centre for Gambling Research, September 2004.

A study in Queensland investigated the impact of allowing a maximum of five \$20 banknotes being able to be entered into an EGM at any one time. The majority of people interviewed for the study reported no change in their gambling behaviour. A significant proportion (15 – 20%) reported reductions in:

- The amount of money spent on EGMs each visit and each month,
- The size of bets;
- The amount of time spent gambling on EGMs each visit and each month; and
- The frequency of visits to gaming venues.

Furthermore, people in the high-risk to problem gambling group were found to experience the greatest changes in behaviour with approximately 30% to 40% reporting changes in the amount of money they spent on EGMs per visit and each month, their levels of enjoyment, the frequency of visits, and the amounts of money spent on other entertainment at gaming venues. Although the majority of consumers reported no change in their gambling behaviours, a significant proportion of people reported harm minimizing behaviours, especially in the high-risk to problem gambling group. Interestingly, despite these reported changes there has been no observable long-term effect on the revenue-generating capabilities of EGMs that can be attributed to change in banknote acceptors.¹¹

Anecdotally, people with gambling problems report that when EGMs were coin only, the stains left on their hands by handling large volumes of coins acted as a restraint on their gambling.

Bet Limits

A bet limit of \$1 per button push would appear to benefit people with gambling problems without disadvantaging the vast majority of people without gambling problems. The Productivity Commission found that on average, people with gambling problems staked \$1.62 per button push compared to 57 cents for non-problem gamblers¹².

Recent research commissioned by the gambling industry found that only 3.5% of EGM gamblers bet above \$1 per button push. Of people without gambling problems only 2.3% bet over \$1 per button push, while 7.5% of people with gambling problems bet over \$1 per button push¹³. The report concluded that a bet limit per button push of \$1 would be “a potentially effective harm minimisation strategy for a small proportion of players.”

The Northern Territory has a bet limit of \$5 in hotels and clubs. Canada has a maximum bet limit of C\$2.50 on Video Lottery Terminals. New Zealand has a maximum bet limit of NZ\$2.50 for machines outside of the casinos. The UK has a maximum bet limit of 0.5 pounds.¹⁴

¹¹ Brodie, M., N. Honeyfield & G. Whitehead, “Change in Banknote Acceptors on Electronic Gaming Machines in Queensland: Outcome Evaluation”, Research and Community Engagement Division, Queensland Office of Gaming Regulation, Brisbane, July 2003.

¹² Productivity Commission, “Australia’s Gambling Industries”, Report No. 10, AusInfo, Canberra, 1999, p. 16.80.

¹³ Blaszczynski, A., L. Sharpe and M. Walker, “The Assessment of the Impact of the Reconfiguration on Electronic Gaming Machines as Harm Minimisation Strategies for Problem Gambling”, University of Sydney Gambling Research Unit, November 2001, pp. 10-11.

¹⁴ Caraniche Pty Ltd, “Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria”, Victorian Gambling Research Panel, Office of Gaming and Racing, Victorian Government Department of Justice, Melbourne, Victoria, December 2005.

Both the findings of the Productivity Commission and of the recent study commissioned by the gambling industry show that the Victorian Government's \$10 bet limit per button push is almost completely irrelevant in any attempt to reduce the level of problem gambling in Victoria. The Government has promised to reduce this to \$5 in its current term in office, but this is of a limited improvement over the \$10 limit.

Reduction in the Number of Lines that can be Bet on

The Productivity Commission found that the average EGM gambler without gambling problems that played more than one line, played an average of six lines. For people with gambling problems the average number of lines played was 8.9. Thus, restricting the maximum number of lines to six would appear not to disadvantage non-problem gamblers, while having benefit for people with gambling problems¹⁵.

Reduction in the Number of Credits that can be Bet per Line

The Productivity Commission found that only 35.7% of EGM gamblers without gambling problems bet more than one credit per line and the average number of credits bet per line for those that bet more than one credit per line was 4.1. On the other hand 65.6% of people with gambling problems bet more than one credit per line and the average number of credits per line for those that bet more than one credit per line was 5.9. Thus, restricting the maximum number of credits that can be bet per line to 4 would appear not to disadvantage non-problem gamblers, while having benefit for people with gambling problems¹⁶.

Breaks in Play

A useful measure would be that EGMs are required to stop play for a short period after a certain length of continuous play, to force a player to take a break. Duration of play is one of the factors distinguishing between people with gambling problems and other players, with people with gambling problems having significantly longer sessions of play¹⁷. The research quoted by Professor Mark Dickerson, the Tattersall's Chair in Psychology, University of Western Sydney, found that the average length of EGM play for frequent players was 67 minutes, while for people with gambling problems the average length of play was 150 minutes. However, more recent research suggests that the average length of play on EGMs is even shorter. The recent report by ACIL Consulting on EGM gambling in Ballarat for Tattersall's reported that the average gambling session for EGM gamblers was half an hour¹⁸. Similarly, work carried out by Professor Blaszczynski for the Gaming Industry Operators Group found that the average length of gambling session for a 'recreational' gambler was 28.8 minutes and for a person with gambling problems was 41.6 minutes¹⁹.

It would therefore be reasonable to suggest that a break in play each half-hour is very unlikely to impact on the enjoyment of the vast majority of 'recreational' gamblers. A break in play could also be triggered each time a certain amount, such as \$50, was lost. In the break

¹⁵ Productivity Commission, "Australia's Gambling Industries", Report No. 10, AusInfo, Canberra, 1999, p. 16.79.

¹⁶ Productivity Commission, 1999, p. 16.79.

¹⁷ Schellinck, T and T Schrans, "Nova Scotia VL Players' Survey" Focal Research Consultants Ltd for the Nova Scotia Department of Health, Halifax, Nova Scotia 1998 and Dickerson, M., "EGM Players and Responsible Gambling", NAGS Practitioners Conference Proceedings, National Association for Gambling Studies, 2000, p. 33-42.

¹⁸ ACIL Consulting, "The Impact of Gaming in Ballarat", 14 December 2001.

¹⁹ Blaszczynski, A., L. Sharpe and M. Walker, "The Assessment of the Impact of the Reconfiguration on Electronic Gaming Machines as Harm Minimisation Strategies for Problem Gambling", A Report for The Gaming Industry Operators Group, The University of Sydney Gambling Research Unit, November 2001, p.58.

from play, warning messages could be played or the gambler could be asked questions by the EGM to ensure that they understood how the EGM worked and the likely rate of loss playing the EGM in question.

IPART in NSW recommended that the NSW Government introduce periodic information messages after 60 minutes of continuous gambling.²⁰ The IPART study noted that another study had found the following three messages resonated most with gamblers and so were seen as having the greatest potential to encourage responsible gambling behaviour.²¹

- Have you spent more money on gambling than intended?
- Are you gambling longer than planned?
- Have you felt bad or guilty about your gambling?

A December 2005 report commissioned by the Victorian Gambling Research Panel, *Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria*, found that most EGM gamblers believed that automatic or regular breaks in play that are built into the EGM would be an effective potential problem gambling measure.²²

One Machine Per Player

The Government should require venues to ensure that a person playing EGMs can only play one machine at a time. Steps should be taken to stop players from jamming keys or the equivalent in the buttons on the EGMs to make them run continuously.

Anecdotal evidence from people with gambling problems is that they will sometimes seek ways of playing multiple machines at one time, which greatly increases their rate of loss.

Prohibition on Linked Jackpots

Linked jackpots may encourage problem gambling behaviour, encouraging EGM gamblers to spend more than they otherwise would in the hope of a large win. A Victorian Department of Human Services report on the impact of gambling on women found that jackpots influenced the amount of time and money spent and on the frequency of gambling on EGMs²³. A moratorium should be placed on all EGM linked jackpots until the Victorian Government is able to conduct credible research to demonstrate conclusively that linked jackpots do not contribute to problem gambling behaviours.

Abolishing the Double-or-Nothing Feature

Currently on some EGMs after a person has a win they are given the option of pressing a double-or-nothing button and can effectively lose hundreds of dollars in a single button push. This feature violates the spirit of the current \$10 bet limit introduced by the State Government.

²⁰ Independent Pricing and Regulatory Tribunal of NSW, "Gambling: Promoting a Culture of Responsibility", June 2004, pp. 39, 59-60.

²¹ Independent Pricing and Regulatory Tribunal of NSW, "Gambling: Promoting a Culture of Responsibility", June 2004, p. 42.

²² Caraniche Pty Ltd, "Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria", Victorian Gambling Research Panel, Office of Gaming and Racing, Victorian Government Department of Justice, Melbourne, Victoria, December 2005.

²³ Victorian Department of Human Services, "Playing for Time. Exploring the Impacts of Gambling on Women", Melbourne, March 2000, p. xiii.

Limiting the opening hours of the gaming area

Limiting the hours of operation of the gaming area reduces the loss on EGMs. The Victorian Government has prohibited 24 hour venues in rural areas, but metro venues can still have 24 hour trading if approved. The Taskforce believes the Victorian Government should follow the lead of Queensland and restrict the hours that the gaming area is open to be between 10 am and midnight each day.²⁴

Removal of ATMs from venues

ATMs should be removed from gambling venues. EFTPOS poses less risk to people with gambling problems due to the interaction with venue staff to access EFTPOS. However, even if EFTPOS is allowed, a low withdrawal limit should be imposed.

The Productivity Commission found that people with gambling problems were far more likely to ATMs to withdraw money to gamble when playing EGMs²⁵.

Table 3: Productivity Commission’s findings of how often people withdrew money from ATMs at a venue when they played EGMs.

	Never	Rarely	Sometimes	Often	Always	Can’t say
Non- problem gamblers	78.2	11.8	5.0	1.4	3.2	0.4
Gamblers with SOGS 5+	34.6	12.4	15.1	16.5	21.3	0
Gamblers with SOGS 10+	18.2	7.0	16.1	34.8	23.9	0

Research commissioned by the gambling industry from the University of Sydney Gambling Research Unit found that people with gambling problems in hotels were more likely to use ATMs, while those in clubs in NSW did not²⁶. The study also found that visits to ATMs in venues were linked to heavy losses²⁷. Further, people with gambling problems would continue to gamble until they had used up all the money available to them through ATMs located in venues²⁸.

A 2001 gambling industry sponsored survey found that 83% of venue patrons in Ballarat did not use ATMs in the venue²⁹. This suggests that removing ATMs from EGM venues is unlikely to inconvenience the majority of patrons, while being likely to assist a significant proportion of people with gambling problems.

A 2004 survey of clients of problem gambling services in Victoria reports that the vast majority of respondents believe that it would be very effective to remove and ban ATMs from gaming venues.³⁰

²⁴ Caraniche Pty Ltd, “Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria”, Victorian Gambling Research Panel, Office of Gaming and Racing, Victorian Government Department of Justice, Melbourne, Victoria, December 2005.

²⁵ Productivity Commission, “Australia’s Gambling Industries”, Report No. 10, AusInfo, Canberra, 1999, p. 16.61.

²⁶ Blaszczyński, A., L. Sharpe and M. Walker, “The Assessment of the Impact of the Reconfiguration on Electronic Gaming machines as Harm Minimisation Strategies for Problem Gambling”, The University of Sydney, November 2001, pp. 58-59, 63.

²⁷ Blaszczyński et. al., p. 63.

²⁸ Blaszczyński et. al., pp. 80, 83.

²⁹ ACIL Consulting, “The Impact of Gaming in Ballarat”, 14 December 2001.

³⁰ New Focus Research Pty, “Problem Gamblers, Loved Ones and Service Providers: Study of Clients of Problem Gambling Services, Stage 2: Round 1 Report”, Victorian Gambling Research Panel, Melbourne, 2004.

A December 2005 report commissioned by the Victorian Gambling Research Panel, *Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria*, found most EGM gamblers access an ATM at least once during a gambling session. Gaming venue managers agree that venue-based ATM-users are most likely to spend their withdrawals on gambling on EGMs. EGM gamblers who use an ATM at gaming venues rarely access it for the purpose of purchasing food and beverages. Those that access an ATM more than twice do so exclusively to gamble. Frequency of ATM use by EGM gamblers is significantly correlated with the reason for accessing an ATM. The frequency of ATM use by an EGM gambler is connected with increased levels of spending, extended amounts of time in the gaming venue, the frequency of their gambling and their score on the problem gambling index. There is a significant relationship between problem gambling and EGM gamblers' usage of ATMs for gambling purposes, whereby moderate-risk and problem gamblers make significantly more withdrawals from an ATM than non-problem or low-risk gamblers. EGM gamblers, particularly those with problematic gambling behaviour, were found to make multiple withdrawals of less than \$200, rendering the Victorian Government's restriction of \$200 per withdrawal a useless measure in reducing problem gambling. EGM gamblers, both in country and metropolitan venues across hotels/pubs and clubs across Victoria, specifically state that ATMs should be removed from gaming venues, and in doing so rank this as possibly the most effective measure that would be introduced in the future. Disconcertingly, more people with gambling problems report that an ATM should be located in the gaming area compared with those gamblers without problems.³¹ The report concluded that "While locating ATMs outside of gaming areas allows EGM players some space or opportunity for thought and contemplation about further gambling – an enforced break-in-play – the accessibility to such facilities may still be too close to the gaming area as to negate this break."

The State Government has required that ATMs in EGM venues be limited to a withdrawal of \$200 per transaction. This will be almost irrelevant in addressing EGM related problem gambling. Statements from people who have had gambling problems indicate that the majority would not withdraw their daily withdrawal limit from an ATM in a single transaction. Rather they would keep going back to the ATM in the venue making small withdrawals after they lost the previous amount until they reached their daily limit. Thus, to limit withdrawals from ATMs in EGM venues to \$200 per time, without changing the daily withdrawal limit is a nonsense.

Paying Winnings by Cheque

The Victorian Government should require that instantaneous winnings over \$250 to be paid entirely by cheque. Under Northern Territory regulations winnings over \$250 are required to be paid by cheque. In NSW venues are required by regulation to pay winnings over \$1,000 by cheque. The Victorian Government currently makes venues pay winnings over \$2,000 by cheque when the gambler cashes out of the EGM. This still means that gamblers can take up to \$2,000 in cash and if they do not cash out after a win they can use up all the winnings by playing on the credit meter.

³¹ Caraniche Pty Ltd, "Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria", Victorian Gambling Research Panel, Office of Gaming and Racing, Victorian Government Department of Justice, Melbourne, Victoria, December 2005.

Venue staff anecdotally report that people they would regard as having gambling problems want their winnings in cash and then plough the winnings back into the machines. Paying winnings by cheque gives the person a significant break before they decide to use the money for gaming purposes again.

A December 2005 report commissioned by the Victorian Gambling Research Panel, *Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria*, found that most EGM gamblers rate payment of large wins by cheque as an effective measure to assist people with gambling problems.³²

Provision of breaks and on-line warnings

On-line warnings about problem gambling and on-line provision of player information are likely to be far more effective than signage and brochures³³. Mark Dickerson has suggested that on-line interventions be used where a machine would ask questions like “How long on average does \$50 last when you play maximum lines on this machine?” He has suggested that similar features could check and correct the player’s perception of time after 50 minutes of play, or when preset budget limits were reached and normalise their beliefs about pay out likelihood. He believed that these features would assist players in making informed choices.

To be effective, warning messages should be personalised to make the gambler reflect on their own behaviour.

Introduction of Smart Cards of USB Keys

A move towards having EGMs only work from a dedicated gambling card or USB key has the potential to assist in promoting more sensible gambling habits as well as assisting those with gambling problems. However, the introduction of such card or USB key operated EGMs carries the risk of increasing problem gambling if cash can be loaded onto such a card or USB key. The card or USB key could become the equivalent of being able to insert a single note worth thousands of dollars into an EGM. For this reason, smart cards or USB keys should not be a replacement for cash.

The State Government could examine requiring operators to move to gambling card or USB key only operated EGMs. Such cards or USB keys could offer the following features and consumer protection measures:

- Pre-commitment. The gambler could be required to specify how much they are willing to lose in a month or week. When this limit is reached the gambler is locked out of the system until the time period expires. Any specification of a period less than a week seems likely not to be effective as a pre-commitment strategy. The development of pre-commitment betting limits was recommended by research commissioned by the Gambling Research Panel that looked at the existing self-exclusion program.³⁴

³² Caraniche Pty Ltd, “Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria”, Victorian Gambling Research Panel, Office of Gaming and Racing, Victorian Government Department of Justice, Melbourne, Victoria, December 2005.

³³ Dickerson, M., “EGM Players and Responsible Gambling”, NAGS Practitioners Conference Proceedings, National Association for Gambling Studies, 2000, p. 33-42.

³⁴ South Australian Centre for Economic Studies, “GRP Report No. 2. Evaluation of Self-exclusion Programs”, Gambling Research Panel, Victoria, Feb 2003.

- Self-exclusion. Having a gambling card or USB key system only would allow someone who chooses to self-exclude to be locked out of the system for the duration of the self-exclusion.
- Activity statements. Having a card or USB key system would allow the generation of a regular activity statement. These might be limited to those that gamble above a certain amount in a given time or based on frequency of play. Someone who only plays less than once a month and spends only a small amount of money is unlikely to need an activity statement.
- Warning messages and breaks. The system could monitor a gambler's play patterns. If a gambler started to increase their intensity in play from their usual pattern, it could trigger appropriate warning messages. This message could appear in the language appropriate to the gambler. Also, if someone plays for a certain period, a mandatory lock-out period could be implemented. This is something that a gambler might be able to specify as part of their 'responsible' gambling strategy.
- Winnings paid into a linked bank account. All winnings could be paid into a linked bank account, but the link should only be one way with no ability for the gambler to draw from the account onto the card.
- Bet limits. The gambler could be required to pre-specify a bet limit on how much they are willing to bet on a single button press with the specification lasting a week or month before the gambler can change the setting.

All of these features are likely to only be of any significant benefit if all EGMs are required to be card or USB key only, otherwise a gambler will be able to get around the consumer protection measures by using EGMs that do not require a smart card to be operated. A possible compromise could be to have very low intensity EGMs that are not card or USB key operated in addition to the card operated EGMs.

A December 2005 report commissioned by the Victorian Gambling Research Panel, *Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria*, found that both EGM gamblers and gaming venue managers agreed that the facility to track spending and set monetary limits would be a potentially effective harm minimisation measure.³⁵

Software solutions towards consumer protection measures for gambling cards or USB keys already exists, as evidenced by software produced by the company REGIS Controls.

Staff Training in appropriate Interventions

Venue staff are now required to have undergone accredited training in the delivery of 'responsible gaming'. However, what goes into the training should also be proscribed. For example, staff should be trained to correct misperceptions patrons might have about how the electronic gaming machines (EGMs) work. As an example, if a patron is saying that they have played a machine for an hour and it has got to pay out soon, staff would be trained to intervene and inform the patron that chance of the machine paying out now is the same as it was an hour ago.

³⁵ Caraniche Pty Ltd, "Evaluation of Electronic Gaming Machine Harm Minimisation Measures in Victoria", Victorian Gambling Research Panel, Office of Gaming and Racing, Victorian Government Department of Justice, Melbourne, Victoria, December 2005.

As the recent research report from South Australia has demonstrated, there are still significant proportions of EGM gamblers who have misperceptions about EGMs. For example.³⁶

- 19% of players strongly believed that winning and losing occurs in cycles on EGMs;
- 5% strongly believed that there are certain ways of playing that increase winning; and
- 18% strongly believed that it is always bad to play on a EGM that has recently paid out.

It may also be possible for staff to be trained to intervene if a person is displaying clear problem gambling behaviours. However, such interventions should not label a person as a ‘problem gambler’ and should in no way place venue staff in a position of counselling a person with gambling problems. It should be acknowledged that many venue staff already suffer work related stress through seeing the self-harm and distress of people with gambling problems and being forbidden by the gambling industry to make any intervention unless the person self-discloses they have a problem. Anecdotal evidence from former venue staff suggest that some venues discipline or even dismiss staff that attempt to assist people they believe may have gambling problems, unless the person in question states that they have gambling problems.

Tough penalties should be introduced for venues that fail to accept a duty of care for minimising harm from EGM gambling.

The Office of Gambling Regulation should be required to conduct audits of venue staff when they visit venues to test venue staff on their knowledge of delivering ‘responsible gaming’. This is similar to staff audits conducted on employees with regard to occupational health and safety issues in many industries. Any penalties for venue staff not being fully aware of their responsibilities to ‘responsible gaming’ should be directed at the venues and not the staff members.

Improving Self Exclusion (Low Effect)

The Victorian Government should legislate that venues have a duty of care to take all reasonable measures to ensure that a self-excluded person cannot enter a venue and that a person that self-excludes can be excluded from all venues. Under the existing industry provided self-exclusion system a person has difficulty excluding from multiple venues and it would be near impossible to exclude from all venues. Also, the existing self-exclusion contracts provide for no liability on venues to enforce the self-exclusion. Provision of the ability for people to self-exclude from all venues and to be detected if they attempt to enter the gaming room of a venue could be provided through the appropriate application of technology. Research commissioned by the Gambling Research Panel stated that “overseas experience indicates that the use of an electronic card may be one of the most efficient ways of delivering consistent identification of self-excluded patrons (notwithstanding that there will always be people who may attempt to circumvent the system).”³⁷ The highest rate of compliance with self-exclusion was found to be the Netherlands where personal identification is required to gain entry into gaming venues.³⁸

The current system of using photos to identify people who have self-excluded is highly ineffective, based on reports from venue staff, problem gambling counsellors and people that

³⁶ South Australian Department for Families and Communities, “Gambling prevalence in South Australia: October to December 2005”, 2006.

³⁷ South Australian Centre for Economic Studies, “GRP Report No. 2. Evaluation of Self-exclusion Programs”, Gambling Research Panel, Victoria, Feb 2003, p. 37.

³⁸ Ibid, p. 72.

have taken part in the self-exclusion program³⁹. A more effective system of detection of people that have self-excluded is needed, as this encourages people in the program to stick to their commitment to be excluded from gambling on EGMs.⁴⁰ In the words of the researchers commissioned by the Gambling Research Panel “The reliance on ‘self’ (certainly for problem gamblers who often experience a complexity of other related problems) is not theoretically based; rather it is administratively argued (principally, but not exclusively) to support a flawed detection and monitoring system, which the industry acknowledges cannot be enforced by venues under current arrangements.”⁴¹

A majority of venues surveyed or interviewed by researchers admitted that they believed the current system of self-exclusion had little or no effect on problem gambling overall.⁴²

Self-exclusion legislation would also need to specify a minimum length of self-exclusion. In NSW and ACT, there is a three-month waiting period by regulation for anyone that decides that they wish to leave a self-exclusion agreement. In South Australia self-exclusion cannot be revoked in the first twelve months.

Venues should be required to promote the self-exclusion program within the venue, by signage, brochures and on-line notices.

It would also be of benefit to the families of people with gambling problems to allow for them to apply to have the person with the problem excluded. Such a measure is already provided for by the Queensland *Interactive Gambling (Player Protection) Act 1998* (pp. 83-84) and through the industry voluntary Betsafe program in NSW.

Problem Gambling Counselling Signage (Low Effect)

The State Government should require problem gambling counselling service signage to be displayed on each EGM, as is the case under NSW regulations. At the moment almost all venues would display such signage in the toilets.

Also such a notice should also be displayed at the main entrance to a venue, again in line with NSW regulations.

Measures to Curb Further Increases in EGM Related Problem Gambling

Implementing a number of the above measures could still leave the gambling industry in a position to introduce new features to EGMs that will allow them to reduce the impact of the measures. Their purpose in doing so is likely to be to maintain current revenue levels, but such action is likely to increase the level of problem gambling as a consequence. Therefore there is a need for the State Government to introduce legislation in such a way as to minimise the likelihood of the gambling industry being able to undermine the above harm minimisation measures.

Legislation should be introduced requiring that any change to an EGM places upon the operator the responsibility to prove beyond reasonable doubt that the change will not increase problem gambling. This will be the most effective method to ensure that the gambling

³⁹ South Australian Centre for Economic Studies, “GRP Report No. 2. Evaluation of Self-exclusion Programs”, Gambling Research Panel, Victoria, Feb 2003.

⁴⁰ Ibid, pp. 10-14, 35-36.

⁴¹ Ibid, p. 63.

⁴² Ibid. p. 12

industry does not change EGMs in ways that will increase the level of problem gambling in the state. This will have the added benefit of preventing the industry from designing EGMs in ways that undermine Government initiatives to minimise harm.

The Government has already accepted the principle with the Commission for Gambling Regulation being able to approve or refuse a new EGM type or a game or a variation to an EGM or game having regard to responsible gaming. The Commission for Gambling Regulation is also required to consider changes or new EGM artwork, screen display and game name in terms of its effect on 'responsible gambling'.

However, the gambling industry is able to make changes to EGMs and roll them out, without adequate safeguards against these features increasing problem gambling. Then the community must prove that the measures introduced have contributed to the level of problem gambling.

The above suggestion changes the onus of proof to the industry to demonstrate that any change will not cause harm. This will mean that research will need to be done prior to the measure being introduced. The Gambling Research Panel could even be required to conduct such research when a change is proposed.

(f) The financial position of the Community Support Fund (the Fund) described in the Act, including, but not limited to:

- (i) payments into the Fund under section 10.3.2 of the Act (and its predecessors);**
- (ii) payments from the Fund under section 10.3.3 of the Act (and its predecessors);**
- (iii) the criteria, processes and methodology for the selection of projects funded by payments referred to in sub-paragraph (ii) above; and**
- (iv) the community benefit statements prepared by those venues not required to contribute to the Fund.**

The Taskforce has concerns that not enough of the Community Support Fund is used to address problem gambling issues within Victoria and that not enough is returned to areas that have higher numbers of EGMs or higher revenue losses. A fixed minimum of 25% of the Community Support Fund should be used each year for problem gambling research, problem gambling counselling services and financial counselling services, with at least \$10 million a year being spent on research to identify what measures will be effective in reducing problem gambling.

A greater proportion of the Community Support Fund should be made available to not-for-profit organisations, for example neighbourhood houses, that are in local areas with high numbers of the EGMs and from where a greater proportion of EGM revenue is raised.

The Taskforce believes that clubs should be required to pay into the Community Support Fund like hotels do, to spread the community benefit and to limit clubs with EGMs being able to cross-subsidise other parts of their business so as to drive out of business competitors in their local area that do not have EGMs.

The Taskforce is concerned that the overwhelming majority of community benefit claimed by clubs under the existing system is the employment of staff. The Taskforce does not believe that the employment of staff is a community benefit that is any different from any other business, particularly from the non-gambling competitors of the gambling club venues.

Further, discounted drinks and meals that unfairly undercut non-gaming venues and bring people into the club in the hope of increasing gaming room patronage can be claimed as community benefits. For example, in the 2003-2004 financial year the Essendon Football Club claimed as part of their community benefits \$122,671 in discounted meals and \$22,948 in discounted drinks.

Further the Taskforce is concerned about some of the trivial claims being made by clubs as part of their community benefits, while acknowledging other clubs are claiming the provision of significant community benefits. Some examples are given below.

From community benefit statements from the 2003-2004 financial year.

Football Clubs

Geelong Football Club - \$0 to charity

St Kilda Football Club - \$0 to charity, \$177 Mascot expenses

Collingwood Football Club - \$0 to charity

Footscray Football Club - \$104 in gifts of goods to charity, spent \$227 in plumbing

Essendon Football Club - \$2,939 to charity, sky channel \$5,566

Clubs

Knox Club – Charity \$3,123 in funds and \$697 in goods and \$787 in voluntary services, and \$6,384 in member bonus points discounts.

Kilmore Trackside – Charity \$97

Sunbury Bowling Club - \$1,020 to charity

Abruzzo Club – Brunswick – Charity \$55, OHP \$2,781

From the Community Benefit Statements for the 2004-2005 financial year.

Clubs that claimed no contribution to community benefit outside of staff wages (the number in brackets being the amount claimed in staff wages).

Bird and Bottle Sporting Club (\$218,973)

Club Leeds (\$3,338)

Club Warrandyte (\$178,917)

Collingwood Football Club (\$133,002)

Eastwood Golf Club (\$96,415)

Geelong Football Club (\$866,978)

Hawthorn Football Social Club (\$76,559)

Leongatha Golf Club (\$4,742)

Morwell Bowling Club (\$28,107)

Murrumbeena park Bowls Club (\$11,352)

Reggio Calabria Club (\$308,894)

Robinvale Golf Club (\$231,764)

Royal Automotive Club of Victoria (\$23,540)

Shanghai Club (\$245,247)

Sunbury Football Social Club (\$437,771)

Sunbury United Sporting Club (\$148,218)

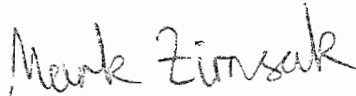
The Danish Club (\$268,403)

Unusual community benefit claims

Bairnsdale RSL – a fountain

Club Foglar Furlan Melbourne – walkie talkies

Club Kilsyth - \$18 to religion
Cranbourne RSL - \$59 to education
Croydon Golf Club - \$46 to charity
Eltham RSL - \$61 of sports sponsorship
Elwood RSL - \$55 educational sponsorship
Fortunes Bendigo - \$35 to religion
Greensborough RSL - \$20 to religion
Hihett Returned and Services Club – Beer/Spirits prices 19% less than adjacent hotels/clubs
Italian Australian Social Sporting Club - \$16 to culture
Menton RSL - \$38 on education
Sandown Racecourse – Highways Tabaret - \$42 to religion
St Albans Sports Club - \$154 for blower petrol
Stoneys Club - \$32 to religion
The Bentleigh Club – Spa pump and framed prints
The Borough Club – Staff meals 60% discount
Trios Taberet (Club) - \$504 for on hold tape
Watsonia RSL - \$28 for culture
Yarraville Club - \$25 for science, \$26 for education and \$36 for recreation



Dr Mark Zirnsak
Chair
InterChurch Gambling Taskforce
c/- 130 Little Collins St
Melbourne, Victoria, 3000
Phone: (03) 9251 5265
Fax: (03) 9251 5491
E-mail: mark.zirnsak@victas.uca.org.au