

Committee Secretary
Joint Select Committee on Gambling Reform
PO Box 6100
Parliament House
Canberra ACT 2600

Via email: gamblingreform@aph.gov.au

Dear Ms Beverley,

Thank you for the opportunity to provide comment on the **National Gambling Reform Bill 2012** (the 'Bill'). As you would appreciate, the timeframe given to provide comment on this Bill has been short, hence the opportunity to consult with a range of community organisations and individuals that make up our membership, and provide an in-depth review, has not been possible.

In the same respect, the ability for community organisations to respond to such legislation is also hampered by lack of resourcing in the area of gaming policy for the community sector. While clubs and affiliated organisations have specific and abundant resources they can direct to such debates, community organisations are inundated with a wide range of pertinent social issues to be addressed without necessarily having targeted resources. In the spirit of consultation and inclusion, the consideration of funding for consumer advocacy should be undertaken to ensure better informed debate on these important issues.

Brief consultations with other Councils of Social Service reflected these issues. As such, ACTCOSS is the only Council which had capacity to respond to this important reform Bill (and only briefly) which will affect every jurisdiction and the organisations and vulnerable community members the Councils represent.

For several years ACTCOSS has worked to increase awareness of the social impacts of gambling and has been involved in a variety of consultations to decrease the harm associated with problem gambling. Problem gambling is a significant social and public health issue that has wide consequences for individuals, families and communities. The majority of problem gamblers identify gaming machines as their primary addiction.

Please find attached the ACTCOSS submission on the Productivity Commission's *Inquiry Into Gambling* which identifies a range of areas for reform to minimise the harmful impacts of problem gambling. Additionally, the COSS Network response can

be found online

<http://www.sacoss.org.au/online_docs/090409%20COSS%20Net%20work%20Gambling%20Productivity%20Commission%20Submission.pdf>.

It appears many of the recommendations of the Productivity Commission in 2010 have not been adopted in the Bill. Given the recommendations stemmed from consultations with a range of organisations, clubs, businesses and public forums nationally, it is disappointing to note the lack of nexus between the Bill and the Productivity Commission recommendations.

ACTCOSS welcomes the proposed limitation on ATM withdrawals on gaming machine premises to \$250 per 24 hour period. However, as this is national legislation, there needs to be clarity in states and territories to ensure consistency of delivery of these regulations.

ACTCOSS approves in principle of a system of pre-commitment. It is crucial within this system all machines are capable of instigating pre-commitment from the onset. However, there is concern regarding Division 3- 33(2) which will not require the system to prevent a person who is not registered in the State or Territory from using the gaming machine unless further amendments are made to the Act. While such provision may relate to the trial period, it may have a long term effect of supporting harmful cross-border gambling if not quickly amended for the extension of the scheme. A sun-set clause on this section may ensure the cross-border restrictions come into play in a timely fashion. It is important to there are specifications set out in the Bill to minimise harm and operate in the best interest of community members and ACTCOSS recommends including this requirement as a part of the final Bill.

Yours sincerely,

Roslyn Dundas
Director

9 November 2012