

28 April 2006

Ms Christine Walter
Manager – Responsible Gambling
Independent Gambling Authority
PO Box 67
RUNDLE MALL SA 5000

Dear Ms Walter

The Australian Gaming Council (AGC) welcomes the opportunity to provide comment to the Independent Gambling Authority (IGA) Review 2006.

The Council does not intend to provide point-by point comment on the specific issues related to:

- Advertising Codes of Practice
- Responsible Codes of Practice
- Game Approval Guidelines; and
- Gaming Machines Licensing Guidelines

The Council does, however, wish to make comment on the overall harm minimisation approach adopted by the Independent Gambling Authority through its designated regulatory function. Our comments relate to the importance of evidence-based measures and evaluation in implementing harm minimisation measures.

Requesting stakeholder views on the purpose, effect and context of particular regulatory measures can be a useful initial exercise in highlighting issues of interest. In isolation, however, this approach falls short in providing a foundation to make an informed judgement on the actual impact of harm minimisation measures.

In 2004, the Ministerial Council on Gambling (including the South Australian Government) signed up to the National Framework on Problem Gambling. One principle adopted within the Framework is that "research and evaluation are essential to ensure that initiatives are likely to minimise problem gambling without unintended negative consequences for the community". The AGC agrees with this principle, noting its consistency with the recommendation in the Reno Model, which has formed the basis of our previous submissions to the IGA. We would support the adoption of this principle to both guide and support the IGA's efforts in devising, implementing and investigating harm minimisation measures.

The AGC notes that in its Annual Report 2003-04, the IGA reported the engagement of researchers from the National Institute of Labour Studies at Flinders University to study the codes of practice, the problem gambling family protection orders scheme and the impacts of changes to gaming machine numbers. It is hoped the methodology and outcomes of this research are made publicly available.

In relation to the second stage issues highlighted for comment, the AGC would welcome clarification of the assumptions and objectives underpinning their inclusion in the codes of practice discussion as well as the target groups they are to be developed for.

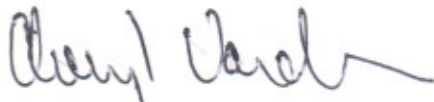
Moreover, it would be valuable to understand the foundation and evidence upon which these measures have been designated priorities, over other approaches such as prevention. Consideration of benchmarks upon which the effectiveness of measures should be assessed would also be welcomed. This information would be valuable to all stakeholders in their efforts to make informed comments and suggestions regarding past, current and future harm minimisation strategies.

While the AGC's comments focus primarily on the need to have rigorous research and evaluation processes in place, we do recognise a number of inclusions in the second stage code of practice issues as being founded in good policy and inline with the principles put forward in the National Framework on Problem Gambling.

Of note is the recognition of the casino host responsibility program, an initiative consistent with the National Framework principle of promoting collaborative partnerships. This program demonstrates industry's ability to work with the community (in this case, the Heads of Churches Taskforce) without the need for government intervention. The voluntary nature of the initiative has provided SKYCITY with the flexibility to implement a number of enhancements to the program since its inception 18 months ago. The willingness of SKYCITY to engage with community groups and invest significant resources in this program seems to not only meet, but exceed IGA's directive of gambling establishments forming relationships with local counselling agencies.

If you have any questions in relation to the issues raised please contact me on (03) 9629 8000.

Yours sincerely



Cheryl Vardon
Chief Executive Officer
Australian Gaming Council

Independent Gambling Authority Form A

Review 2006—Regulatory Functions

(Please read the notes at the end of this form before completing)

1. Personal details

<i>Name of contact person (please include titles and qualifications)</i> Ms Cheryl Vardon	
<i>Street address (include postcode)</i> Level 10 34 Queen St MELBOURNE 3000	<i>Home phone</i>
	<i>Work phone</i> (03) 9629 8000
	<i>Facsimile</i> (03) 9629 8000
	<i>Mobile phone</i>
<i>Email address</i> cvardon@austggamingcouncil.org.au	
<i>Do you wish to remain anonymous? (circle/strike out as appropriate—a blank is a "NO")</i> YES <input type="radio"/> NO <input checked="" type="radio"/>	

2. Organisation details

<i>If you are making this submission on behalf of a body (such as a government department, a service provider, a recognised charity), on behalf of a group of people (such as an informal association of people with a specific interest in gambling) or in some other capacity (for example, as a university lecturer) please provide the details of the body and indicate whether your submission is the body's OFFICIAL position or simply your own UNOFFICIAL view.</i>
<i>Name of body, association or organisation</i> Australian Gaming Council
<i>Your title, designation or position</i> Chief Executive Officer
<i>Is the submission</i> <input checked="" type="radio"/> OFFICIAL <input type="radio"/> UNOFFICIAL

3. Submission details

This submission addresses the following areas of the review (tick as appropriate)

- FIRST STAGE CODES OF PRACTICE
- SECOND STAGE CODES OF PRACTICE
- GAME APPROVAL GUIDELINES
- GAMING MACHINE LICENSING GUIDELINES

This submission is made by (circle/strike out as appropriate)

HARD COPY AND DISK

HARD COPY AND EMAIL

HAND WRITTEN COPY ONLY

If the submission has been provided as a handwritten version only, it will need to be typed to enable ease of reading and placement on the Authority's website. Do you permit the Authority to produce a typed version of your handwritten submission?

(circle/strike out as appropriate—a blank is a "YES") YES NO

4. Hearing

Do you or your organisation intend to present at the public hearing on 23 and 24 May 2006?

(circle/strike out as appropriate—a blank is a NO) YES NO

Who will be presenting at the hearing (including position held if representing an organisation)?

Will you require any equipment for your presentation, such as Powerpoint?

(circle/strike out as appropriate—a blank is a NO) YES NO

If you require any equipment other than Powerpoint, please specify.

Acknowledgment and consent

1. I have read the submission guidelines for the inquiry and make this submission on the basis set out in that document.
2. I take responsibility for the correctness and accuracy of statements made in this submission.
3. Unless specifically attributed to others, the opinions, comments and observations in this submission are my own.
4. I consent to the whole or any part of this submission being published by the Independent Gambling Authority.

Date

28/4/06.

Signature

Cheryl Vande

NOTES FOR COMPLETION OF SUBMISSIONS

1. Personal details

If you want to be **anonymous**, Form A will be separated from the attached submission and only the submission will be shown to the participants or otherwise published. However, you will need to be careful with your submission to make sure that you do not inadvertently identify yourself. Please note that your details may be disclosed to certain members of the board and staff of the Authority.

2. Organisation details

- (1) This section has two purposes: while it allows a person to make an official submission on behalf of an organisation, it also allows people whose role in an organisation makes them experts or opinion leaders (or both) to credential their submissions appropriately.
- (2) If the submission is made as the official submission of a group, please expect the Office of the Authority to seek independent verification of the status of the submission.

3. Submission details

When supplying your submission on disk or by email, please make the submission as a Word for Windows (*.doc) or rich-text format (*.rtf) document or as an Adobe Acrobat format document—in the case of email, supplied as an attachment

4. Acknowledgment

The acknowledgment is important. It makes sure that you understand some of the issues involved in making comments which might be published. Please read it carefully.