## Comments on the Productivity Commission's Draft Report into Gambling (2009)

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I read the Draft Report with interest, in particular your chapter on accessibility of gaming machines as I have been examining this within my own research. I would like to raise some issues for the Commission to consider in terms of accessibility and gaming machines.

- 1. When discussing accessibility the Commission should be clear about the type of accessibility to which they are referring. In the main, the Draft Report (Productivity Commission, 2009) discusses a narrow concept of geographic accessibility. The discussion around reductions in hours of operations could be referred to as temporal (time based) accessibility. As per the previous Productivity Commission Report (1999), accessibility should be considered to be multi-dimensional. Two recent papers have been published with regard to the multidimensionality of accessibility (Hing & Haw, 2009; Thomas, et al., online first) which found accessibility could be delineated as geographic (physical proximity to venues); temporal (opening hours); social (a venue which provides a safe, social environment, variable entertainment and is an oasis), financial (provision of low outlay games and access to money), and cognitive (familiarity and understanding of games). Hing and Haw also referred to physical accessibility which was a combination of location of venues, opening times and available products. Moore et al. (2008), has also presented similar data on the multidimensionality of accessibility at a recent National Association of Gambling Studies conference. Notwithstanding this, recent research results suggest the geographic and temporal aspects of accessibility are the most important when considering relationships to problem gambling (Moore, et al., 2008; Thomas, et al., 2009a), as these aspects have been shown to be significantly and positively related to severity of gambling behaviour whereas social and personal aspects of accessibility appear to be, at best, only weakly related.
- 2. I think the Commission should consider whether number of individual machines are the most valid indicator of geographic accessibility and, more importantly, whether a cap on total number of EGMs within a region is the best method of reducing geographic accessibility. You refer to recent evaluations of a reduction in the number of machines in Victoria and South Australia (see 10.11-10.12 of Productivity Commission's 2009 Draft Report). Both evaluations found the modest reductions in the number of machines had no

discernable affect on gambling behaviour. It is likely that individual behaviour will be more affected by a reduction in the number of EGM <u>venues</u> within a local geographic region than by a reduction in the number of machines within a venue or region. Studies have shown that people tend to travel short distances (e.g., less than 5km) to access EGM gambling (Delfabbro, 2008; KPMG Consulting, 2000; Robitaille & Herjean, 2008). There is also evidence that people are motivated to gamble by the geographical and temporal accessibility of EGM venues (Thomas, et al., 2009b) and that these motivations are strongly related to both gambling frequency and problems (Thomas, et al., 2009a).

In line with this, your recommendation to further limit venue opening hours is likely to have a positive impact in terms of reducing extended gambling sessions by problem gamblers. It may be worthwhile to consider additional recommendations along the lines that measures to control geographic accessibility of EGM gambling be linked to the number of EGM venues within a geographic region rather than the number of machines across a region. This would restrict the ability of industry to simply move machines between venues or remove underperforming machines.

- 3. Reducing the number and position of EGM venues within a local area may assist problem gamblers to physically avoid venues when attempting to cut down or abstain from gambling. In my research with EGM problem gamblers I have heard both gamblers and counsellors discuss the difficulties associated with avoiding venues: "Before they were in Victoria I wasn't addicted to them because I wasn't looking at them in every street corner" (F, Regional participant, PG) (Thomas, et al., online first, p7). I particularly recall a gambling counsellor saying that treatment seekers coming to her service had to pass a number of venues regardless of the route taken. It may also be useful to consider more stringent limitations on the number of venues within regions known to be more vulnerable (i.e., low socio-economic status).
- 4. Linked to this is the need to ensure that people have access to adequate alternative activities and spaces that are local, open long hours and allow for casual social interaction (Thomas, 2009; Thomas, et al., 2009b). Clubs may provide a variety of options including EGM gambling, however, people who have experienced problems with their gambling require alternatives in locations that do not include EGM gambling. Outer lying suburbs may be found to be particularly lacking in terms of an adequate number and variety of options.
- 5. Finally, the point made on page 10.5 of the Productivity Commission's (2009) Draft Report that "it would be difficult and impractical for any government to significantly reverse a long-standing policy of liberal access to gaming machines". The Draft Report refers to both Switzerland and Russia legislating to reverse widespread liberalisation of gaming machines. The Commission might also be interested in the experience of Norway, where EGMs were also recently banned. Very recent research by Lund (2009) suggests gambling frequency and problems have reduced following the ban. These examples show that even drastic reductions in accessibility to EGM gambling is feasible if government and the community feel it is a necessary course of action which will have a positive impact on gambling behaviour. Difficulty of implementation should not stand in the way of the Commission's

recommendations if, on balance, it is thought that EGMs pose a substantial risk to a proportion of the community and that reductions in the supply of that product would reduce the risk. The Productivity Commission's Draft Report (2009) estimates that, on average, 16% of regular EGM gamblers experience gambling problems and that around 80% of gambling treatment seeking in this country relates to EGMs. As noted above, geographic as well as temporal accessibility to gambling is strongly related to EGM gambling problems (Thomas, et al., 2009a). Thus, further consideration of a reduction in geographic accessibility to EGMs (in terms of spatial distribution of venues within the community) should be made by the Commission, based on the balance between harm and benefit.

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