

Intelligence Report | Huon Hill Club Ltd – Application for New Premises (Club Wodonga) with 70 EGMs

Regulatory Services Division | Risk & Intelligence
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Report Scope

General Scope

To support the Commission in its hearings, the Risk and Intelligence (**R&I**) team within the Regulatory Services Division (**RSD**) will provide an intelligence report (**IR**) applicable to the applicant or matter at hand.

R&I will aim to provide insightful information to the Commissioners which will include an assessment of both qualitative and quantitative data, an environmental scan to detect intelligence applicable to the applicant or the matter, and a broad review of the matter contained in the application.

Where figures provided by the applicant are cited, these are drawn directly from the supporting documents submitted with the application.

Current Intelligence Report Scope

This Intelligence Report supports the Commission's assessment of an updated application from Huon Hill Club Ltd to install and operate 70 electronic gaming machines (EGMs) at Club Wodonga (formerly Huon Hill Hotel), located at 48 Reid Street, Wodonga.

The current application reduced the number of EGMs from 75 to 70. The applicant has retained the same Net Machine Revenue (NMR) assumptions, adjusting projections using a 70:75 ratio.

Given the timing of this submission, the Risk and Intelligence team has incorporated updated FY24–25 player loss data. The previous analysis relied on FY23–24 figures.

In compiling this intelligence report, R&I focused on providing:

- a) player loss and Net Machine Revenue (**NMR**) data for venues with characteristics like the proposed Club Wodonga. NMR is the daily player loss per EGM in the venue.
- b) comparative analysis of player loss and NMR data for venues across the state
- c) comparative analysis of NMR calculated by R&I to that supplied by the applicant.
- d) information around the potential economic and social impact of the Club Wodonga application, if approved
- e) intelligence on the entities/applicants:
 - i. Huon Hill Club Ltd
 - ii. Huon Hill Hotel
 - iii. JDA Hotels
 - iv. Dean Nicholas Feros
 - v. John Theodore Feros
 - vi. Paul John Henderson

In delivering on the above scope and approach, R&I assessed the following as part of this intelligence report:

- Gaming venue player loss and population data from VGCCC website
- Socio-Economic Indexes for Areas (**SEIFA**)
- Population data from the Australian Bureau of Statistics
- Submitted application for approval of premises for gaming
- Complaints and Compliance data from LaGIS
- R&I tip-off data
- Open-source intelligence – Google and World Check
- Media reports relating to Club Wodonga
- [Probity requests](#) conducted and obtained by Commercial Licencing
- Council agenda notes from the Rural City of Wodonga

Executive Summary

The applicant, Huon Hill Club Ltd, submitted a forecasted NMR of **\$163** for FY26/27, identical to the previous application.

R&I reviewed the applicant's NMR estimate and used three comparative methods based on FY24/25 data. Each is also projected to FY26/27 using the compound annual growth rate (**CAGR**) observed between FY22/23 and FY24/25. The results are set out below.

1. \$267 per machine based on country venues with a similar number of EGMs
(*\$271 based on 0.76% CAGR*)
2. \$226 per machine based on LGAs with comparable populations (*\$246 based on 4.24% CAGR*)
3. \$165 per machine based on Neighbouring LGAs in Country regions
(*\$269 based on 1.23% CAGR*)

The applicant's forecast is noticeable lower than the first two methods but does align with the third. This suggests the applicants forecast appears reasonable, however, it is also necessary to assess the Rural City of Wodonga itself due to the significant diversion of player loss that will occur.

Player loss in the Rural City of Wodonga for FY24/25 was \$203 per machine from three existing venues. Player loss increased from \$10.7 to 11.1 million, (FY22/23 to FY24/25) reflecting a CAGR of 1.8%. Forecasts for FY26–27 based on this CAGR results in an updated estimated NMR of Wodonga of **\$210**.

Based on the applicant's diversion and transfer model of player loss (40% new, 30% existing Wodonga venues, and 30% from New South Wales¹, the estimated scenario's with and without Club Wodonga present suggests that while NMR will decrease by \$30 per machine, overall player loss will increase by **\$2,911,678** and rise over **25.27%** from the previous year between FY25/26 and FY26/27.

Scenario	Financial Year	Player Loss (\$)	Est. Annual Increase (%)	Number of EGMs	NMR (\$)
Projected – No Club Wodonga	FY26/27	11,521,808	1.80%	150	210
Projected – Club Wodonga	FY26/27	14,433,486	25.27%	220	180

Community views on the updated application are not yet known due to submissions still being open. Community views on the previous Club Wodonga's proposal of 75 poker machines were overwhelmingly opposed to the proposal. Supporters cited upgrades, jobs, and community funding, while opponents raised concerns about the [50% machine increase](#) in the region and social impacts. Of 40 submissions, 95% opposed the proposal, highlighting financial and social harms; a small minority supported it for economic reason and social impacts.

The social impact assessment identified 24 adverse impacts and 9 benefits.

The Rural City of Wodonga Council resolved on 23 June 2025 to formally object to the application submitted to the VGCCC.

R&I's checks found no recent compliance issues with the applicant.

¹ This model accounts for the significant impact of cross-border gaming, given the close proximity of Wodonga to the NSW-Vic border, where gaming activity in Albury (with over 1,000 EGMs) influences player behaviour in Wodonga.

Quantitative Data Analysis – NMR Assessment

Assessing possible increases in NMR

R&I calculated a range of NMR estimates using several methodologies, applying different business rules to determine likely outcomes for Club Wodonga. The following comparative factors were considered:

- Venues of similar type (Club) with similar number of EGMs (**70**)
- LGAs with similar Estimated Resident Population (ERP) Size² (**44,824**)
- Neighbouring LGAs in Country regions
- Existing venues within Rural City of Wodonga (**3**)

A detailed Year-on-Year analysis was also conducted for player loss trends for Rural City of Wodonga, projecting out to the likely date of the establishment of the venue in FY26/27.

Comparison of NMR of similar gaming venues

Venues with similar number of EGMs

The table below presents FY24/25 NMR data for a sample of venues with a similar number of EGMs (between 65 and 75) to the proposed venue (70 EGMs). To ensure comparability, only clubs located in the country have been included and LGAs with populations more than double or less than half the size of the Rural City of Wodonga have been excluded. This approach is consistent with the applicant's view that hotels are not an appropriate comparison.

The NMR across this group ranges from \$96 to \$372 per machine, with an average of \$267. This indicates that venues with a similar scale of operation in demographically comparable areas are generating significantly higher NMR than the applicant's projected figure of \$163.

Venue Name	Venue type	LGA Name	EGMs	FY24/25 Player Loss (\$)	NMR (\$)
Kyabram Club	Club	Shire of Campaspe	65	4,693,030	198
Mildura Working Mans Sports & Social Club	Club	Rural City of Mildura	67	9,102,440	372
Moe Racing Club	Club	City of Latrobe	75	9,115,131	333
Morwell Bowling Club	Club	City of Latrobe	69	2,430,123	96
Sporting Legends Club	Club	Shire of Wellington	74	7,591,456	281
Warragul Country Club	Club	Shire of Baw Baw	67	7,913,905	323
Wonthaggi Club	Club	Shire of Bass Coast	68	6,598,875	266
Average				6,777,851	267

² Estimated resident population (ERP), ABS 30 June 2024

LGAs with similar population size

The table below compares NMR for LGAs with similar estimated resident populations (ERP) to the Rural City of Wodonga. The data shows an NMR range between \$159 and \$271 per machine, with an average of \$226, which again is higher than the applicant's projected NMR of \$163.

LGA Name	ERP - 30 June 2024	FY24/25 Player Loss (\$)	Number of venues	Number of EGMs	NMR (\$)
Shire of East Gippsland	49,422	31,670,818	10	332	261
Shire of Wellington	46,533	27,335,171	7	317	238
Rural City of Wodonga	44,824	11,118,614	3	150	203
Shire of Bass Coast	43,557	20,750,307	5	213	271
Shire of Surf Coast	39,928	5,160,648	3	89	159
Average NMR					226

Neighbouring LGA comparison

Compared to its neighbouring LGAs, the Rural City of Wodonga is the largest LGA with the second highest number of venues, EGMs and highest player loss (\$) in FY24/25. This higher player loss is mitigated by the fact that this LGA has the highest ERP in the region. It is important to note that the Rural City of Wodonga has 1.5 to 7 times the ERP of its neighbouring LGAs.

LGA Name	FY24/25 Player Loss (\$)	Region (Country/Metro)	Number of Venues	Number of EGMs	ERP – 30 June 2024	NMR (\$)
Rural City of Wodonga	11,118,614	Country	3	150	44,824	203
Rural City of Wangaratta	10,872,617	Country	4	154	30,169	193
Shire of Alpine	3,507,267	Country	2	58	13,199	144
Shire of Towong	451,487	Country	1	10	6,237	124
Shire of Indigo	N/A	Country	0	0	17,788	N/A
Average NMR						165

Venues within Rural City of Wodonga

The table below compares NMR at the venue level within the same LGA as the proposed Club Wodonga. Actual NMRs in the LGA range from \$153 to \$234 with an average of \$203.

Venue Name	LGA Name	EGMs	FY24/25 Player Loss (\$)	NMR (\$)
Elgin's	Rural City of Wodonga	80	6,828,397	234
Blazing Stump Hotel	Rural City of Wodonga	40	2,239,124	153
Birallee Tavern	Rural City of Wodonga	30	2,051,093	187
Average NMR				203

Year on Year player loss trends for Rural City of Wodonga

The table below outlines annual player loss trends and NMR in the Rural City of Wodonga from FY17/18 to FY24/25. Prior to COVID-19, player loss remained steady between \$7.6 million and \$7.8 million, with negligible growth. The pandemic caused a sharp decline in FY19/20 and FY20/21, followed by a strong increase in the following year.

Post-COVID (considered to be FY22-23 onward), player loss has stabilised at a higher level, between \$10.7 million and \$11.1 million, from FY22/23 to FY24/25. This reflects a compound annual growth rate of 1.8%. (Reflecting a mid-point between the 0/5% growth in FY23/24 and 3.1% in FY24/25. Over the same period, NMR has grown by the same rate, due to stability of EGM numbers.

The table below reflects this projected forward to **FY26/27**, the first anticipated year of trade for the new venue.

Financial Year	Player Loss (\$)	Increase (%)	Number of EGMs	NMR (\$)
FY17/18	7,768,080	3.3%	135	158
FY18/19	7,643,163	-1.6%	135	155
FY19/20	6,203,089	-18.8%	143	119
FY20/21	4,263,904	-31.2%	139	84
FY21/22	9,192,350	115.6%	143	176
FY22/23	10,728,932	16.7%	150	196
FY23/24	10,782,767	0.5%	150	197
FY24/25	11,118,614	3.1%	150	203
FY25/26	11,318,416	1.80%	150	207
FY26/27	11,521,808	1.80%	150	210

FY26/27 forecast and NMR projections

The applicant estimates that its Gross Gaming Revenue (GGR), or total player loss, for its venue will be **\$4,159,540** in FY26/27, comprised of the following components:

Player Loss component	Total (\$)	% of trade
New trade	1,663,816	40%
Diverted trade within Wodonga	1,247,862	30%
Transferred trade from NSW	1,247,862	30%
Total	4,159,540	100%

Both the GGR estimate and the assumptions regarding trade diversion and transfer appear broadly reasonable. However, there is limited ability to validate this approach. One possible method of validation would be to examine changes in player loss across all venues in LGAs where a new EGM venue opens/closes or increases/decreases its allocation. This would require:

- Accurate data on the timing of venue openings, closures, or changes in EGM numbers, to allow apportionment of player loss variation in surrounding venues
- Analysis of neighbouring LGAs to assess potential trade transfer (requiring geospatial analysis)
- Analysis of the same LGA to assess trade divergence
- Comparison limited to similar Country LGAs due to differing metropolitan market dynamics

- Consideration of underlying market conditions (e.g. COVID, expected NMR without EGM change, overall NMR rise/fall across the sector)

Furthermore, in this instance, cross-border trade transfer introduces additional complexity, making comparisons with other regions less reliable.

Impact of Club Wodonga's presence

Based on the projected growth of player loss in Rural City of Wodonga (1.8%) and the diverted/transferred trade assumptions we can estimate how this LGA would look with and without the presence of Club Wodonga:

Scenario	Financial Year	Player Loss (\$)	Annual increase (%)	Number of EGMs	NMR (\$)
Projected – Without Club Wodonga	FY26/27	11,521,808	1.80%	150	210
Projected – With Club Wodonga	FY26/27	14,433,486	25.27%	220	180

Additionally, we can model this down to a venue level by applying individual venue CAGR and total LGA CAGR (noting venue CAGR will be adjusted to align to overall LGA CAGR).

Venue Name	With Club Wodonga			Without Club Wodonga		
	EGMs	FY26/27 Player Loss (\$)	NMR (\$)	EGMs	FY26/27 Player Loss (\$)	NMR (\$)
Elgin's	80	5,884,550	201	80	6,599,281	226
Blazing Stump Hotel	40	2,229,783	153	40	2,500,610	171
Birallee Tavern	30	2,159,613	197	30	2,421,918	221
Club Wodonga	70	4,159,540	163			
Total	220	14,433,486	180	150	11,521,809	210

Conclusion of NMR assessment

The applicant's revised proposal for 70 EGMs at Club Wodonga maintains the same forecast NMR of \$163 per machine as the earlier application for 75 EGMs. While this figure is lower than the NMR observed in comparable country venues and LGAs of similar population size, it is broadly consistent with data from neighbouring LGAs and the Rural City of Wodonga itself.

R&I analysis indicates that projected NMR levels are within a plausible range when adjusted for the applicant's assumed diversion and transfer of trade. However, approval of the application is forecast to significantly increase total player loss in the Rural City of Wodonga from \$11.5 million to \$14.4 million in FY26/27, a 25.27% increase from FY25/26. This growth will occur despite a decrease in average NMR, due to the additional 70 EGMs introduced by Club Wodonga.

On balance, the application presents a moderate to high risk of increased gambling-related harm at the local level, driven primarily by increased access and aggregate expenditure, despite a plausible NMR forecast. The Commission may wish to further scrutinise the assumptions underpinning the transfer model and consider the adequacy of proposed community benefit measures in the context of projected harm.

Additional Intelligence Analysis and Checks

SEIFA data comparisons (neighboring LGAs)

The below table shows the SEIFA ranking for the Wodonga City council and the neighbouring LGAs

LGA Name	SEIFA IRSD ³ score	SEIFA IRSD Rank (State)	Player Loss FY24/25 (\$)	Number of Gaming Venues	Number of EGMs	NMR (\$)
Rural City of Wodonga	973	23	11,118,614	3	150	203
Rural City of Wangaratta	988	30	10,872,617	4	154	193
Shire of Towong	1001	39	451,487	1	10	124
Shire of Alpine	1028	56	3,507,267	2	58	144
Shire of Indigo	1029	58	N/A	0	0	N/A

Lower SEIFA scores correspond to higher levels of socio-economic disadvantage. Factors considered in this evaluation include income, education, and employment. The Rural City of Wodonga sits at the top of the ranking when compared to neighbouring LGAs, meaning it has a higher level of disadvantage.

Community and council response to proposal

An Open-Source Intelligence search identified multiple articles published by the Border Mail between 16th and 13th of July 2025, regarding the original application for 75 poker machines at Club Wodonga, which has now been amended to 70 poker machines.

Rural City of Wodonga Council meeting agenda notes are also included.

Wodonga Council

[The Border Mail on 26 July 2025.](#)

- Wodonga Council announced it had opened a new submissions process for the 70-poker machine application on its Facebook page on Thursday 24 July. With submissions due to the council by Wednesday 6 August or to the VGCCC by 19 September 2025
- It is worth noting, the submission outcomes following the amended 70 poker machine application will not be published by Wodonga Council until late September 2025 at earliest.
- It is anticipated the community feedback will be similar to the original proposal, with the only change being a reduction in poker machines from 75 to 70.

The previous comments were made by JDA Hotels co-owner John Feros and former Wodonga deputy mayor Kat Bennett following the original application for 75 poker machines.

John Feros

[The Border Mail on 16 May 2025.](#)

- "The facility itself will be much more than gaming. We're intending to do significant upgrades to the food and beverage offerings, the entertainment offerings, and the function facilities," he said.

³ IRSD – Index of Relative Socio-economic Disadvantage - [Socio-Economic Indexes for Areas \(SEIFA\), Australia, 2021 | Australian Bureau of Statistics](#)

- "The aim is to use local consultants, local builders, and the club will also be employing a significant number of local people for staffing requirements."
- Club Wodonga's estimates approximately \$370,000 per year would be contributed back to the community as part of net poker machine earnings.

Kat Bennett

[The Border Mail on 16 May 2025.](#)

- Former Wodonga deputy mayor Kat Bennett has voiced concerns about the proposal that would see the city's number of poker machines increase by 50 per cent. (From 150 to 225 if successful).
- Ms Bennett labelled Huon Hill Hotel's application "a reckless move that puts profits ahead of people".
- Ms Bennett said "Wodonga Council has asked people to either submit to their submission or separately submit, but I also think it's very important to tell councillors how you feel about this". "They also need to understand the community sentiment behind it. That is such a big driver to get things happening or not."

The summary below is extracted from the Rural City of Wodonga council meeting agenda scheduled for 23 June 2025.

Residents were urged to submit any concerns or thoughts around the Club Wodonga proposal by 30 May 2025. The feedback received following the Club Wodonga proposal was mostly in opposition to the proposal.

In addition to the community feedback, there were three posts on the Wodonga Council Facebook page regarding the formal community feedback link. Over these three posts, there were 45 comments and 29 shares. These comments included feedback both for and against the proposal.

Of the formal community feedback, a total of 40 responses were received over the three weeks, with 95% of these citing concerns around the negative impacts of the proposal.

- Financial impact (including in reference to the current cost of living crisis)— evident across 28 (74%) submissions.
- Impact on family and friends (including domestic violence)— evident across 25 (66%) submissions.
- Impact on mental health (including the risk of substance abuse and addiction) – evident across 17 (45%) submissions.

Other recurring themes in opposition to the Club Wodonga application include:

- Concern around the vulnerability of individuals in the community (32%)
- Risk to community safety that problem gambling can cause (32%)
- That currently support services, including health services, gambling support, the police and volunteer relief organisations are stretched and that a potential rise in gambling harm from additional machines would further burden these services (32%)
- The impact on the local economy including the redistribution of spending away from local business' and towards gambling is also a concern for the local community (22%)

Two responses (5%) in support of the application were received:

- One response articulated that gambling is the choice of the individual and having another venue in Wodonga will result in less revenue being lost to Albury. The community member also noted the proposed site is near an accommodation venue in Wodonga.
- The other response in support of the proposal noted the benefits of the community contributions the club will be required to provide along with the expansion of a local business including increased employment opportunities.

The overall score of the social impact assessment undertaken by council officers indicates that the proposal will likely result in 9 benefits and 24 disbenefits.

The Rural City of Wodonga council recommendation are as follows:

- Make a submission to the VGCCC objecting to the application submitted by Huon Hill Club Ltd (trading as Club Wodonga) for approval of premises for gaming with 75 Electronic Gaming Machines at 48 Reid Street, Wodonga as per the attachment.

The following statements were provided by: JDA Hotels, following comments and recommendations made by Wodonga Council.

[The Border Mail on 13 July 2025.](#)

- JDA Hotels said the comments and recommendations by Wodonga Council about the initial 75 poker machine proposal led to an adjustment from 75 to 70 poker machine as part of the amended application.

Gambling-related complaints and tip-offs against Huon Hill Hotel

There has been one complaint received about the current existing premises of Huon Hill Hotel in **February 2019**.

The complaint was lodged in 2019 and has no association to the current venue operator, applying for Club Wodonga.

“Huon Hill allows minors to drink intoxicated, and the bar staff are in on it”

Finalisation Outcome: Inquiries conducted with 3 Police portfolios and council. The venue was well run with an older demographic. 0 breaches detected.

There have been no tip-offs received in relation to Club Wodonga, Huon Hill Hotel, JDA Hotels, Dean Nicholas Feros, Paul John Henderson or John Theodore Feros.

Compliance activities

The inspections below refer to the current existing premises of Huon Hill Hotel.

Inspection conducted in **February 2018**.

A warning letter was issued for signage not displayed in line with the Liquor Control Reform Act 1998.

Inspection conducted in **August 2015**.

0 breaches detected.

Inspection conducted in **March 2014**.

0 breaches detected.

Probity checks

The Commercial Licencing team have previously conducted probity checks on the following entities:

- Huon Hill Club Ltd
- Dean Nicholas Feros,
- John Theodore Feros
- Paul John Henderson

The probity requests consisted of the entities acquiring a National Police Certificate, Credit Report, Summary of financial information and ASIC searches.

Internal probity checks were also completed in February 2025 from Intel, Investigations, Compliance, Commercial Licencing and Complaints. The checks consisted of historical investigations, breaches, complaints, World Check, VGCCC Intelligence Holdings, Open-source searches and AUSTRAC searches.

Interstate probity checks were received for adverse information from QLD, NSW and ACT in February 2025.

Following the outcome of these probity checks, Commercial Licencing have deemed the associates as suitable in May 2025.

Intel have conducted further updated probity checks in June 2025 on the following entities:

- Huon Hill Club Ltd
- Huon Hill Hotel
- JDA Hotels
- Dean Nicholas Feros,
- John Theodore Feros
- Paul John Henderson

The checks consisted of open-source searches, World Check, VGCCC intelligence holdings and AUSTRAC searches. These updated probity searches have not yielded in any new findings or adverse information.