

CLUB OFFICER PROPOSED INCREASE IN ELECTRONIC GAMING MACHINES SOCIAL AND ECONOMIC IMPACT ASSESSMENT

25 May 2026



Club Officer Proposed Increase in Electronic Gaming Machines
Social and Economic Impact Assessment

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Acronyms

EGM	Electronic gaming machine
FTE	Full time equivalent
LGA	Local government area
SEIA	Social and economic impact assessment
SEIFA	Socio-economic Index for Areas
VGCCC	Victorian Gambling and Casino Control Commission
VGCLR	Victorian Commission for Gambling and Liquor Regulation

1 Introduction

1.1 Background

1. On 25 March 2026, Cardinia Shire Council (Council) was notified of an application to the Victorian Gambling and Casino Control Commission (VGCCC) by Cranbourne Pakenham Racing Club Incorporated (the Applicant) to increase the number of electronic gaming machines (EGMs) by 20 from 60 to 80 (the proposal) at Club Officer (the venue) located at 3 Niki Place, Officer (the proposal site).
2. On 1 April 2026 I was engaged by Council to prepare a Preliminary Opinion Report (report) discussing the impacts of the proposal on the wellbeing of the community. This involved an assessment of factors outlined in Section 1.2.
3. On 14 May 2026 I was engaged by the Marcus Lane Group to prepare a full Social and Economic Impact Assessment (SEIA).

1.2 Purpose of SEIA

4. The purpose of the SEIA is:
 - i. To identify the potential social and economic impacts of the proposal on the wellbeing of the community considering potential risk and protective factors.
 - ii. To identify mitigation measures which may reduce the potential risks and harms, and increase the potential protective factors and benefits associated with the proposal, should the Commission be of mind to approve the application.

1.3 Methodology

5. The SEIA has been prepared within a contemporary social impact assessment framework consisting of specific principles, processes and methodologies (refer to Appendix 2).
6. The following tasks were undertaken during the preparation of the SEIA:
 - Review of the following documentation accompanying the proposal:
 - Application Form for Amendment to Venue Operator's Licence, together with the following attachments: 1:250 scale plan of the premises; and 1:50 scale of the gaming machine area.
 - Social and Economic Impact Assessment (SEIA) prepared by Rhys Quick of Urbis dated February 2026.
 - Expenditure Analysis prepared by Tim Stillwell of SW Accountants & Advisors dated 23 December 2025
 - Responsible Service of Gambling Compliance Report prepared by Elizabeth Mackintosh of Onyx dated 6 February 2026
 - Witness Statement of Hussein Dergham
 - Witness Statement of Neil Bainbridge
 - Leigh Barrett and Associates Harm Minimisation and Code of Conduct Policies and Procedures, Club Officer
 - Review of the following information prepared by the VGCCC:
 - Club Officer – Size Layout Facilities report

Club Officer Proposed Increase in Electronic Gaming Machines
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- E&S Report Club Officer 29 April 2026
- RIA Club Officer Intelligence Report
- Inspection of proposal site and surrounds conducted on Tuesday 21 April 2026 between 11.15am and 12pm.
- Review of relevant Council plans, strategies and policies.
- Review of relevant scientific and academic research (refer to Appendix 1).

2 Club Officer

2.1 Venue approval

7. In November 2013 the Victorian Commission for Gambling and Liquor Regulation (VCGLR) approved an application for 60 EGMs at the proposal site. One of the reasons for approving the application was that the application would not result in an increase in EGMs or gaming venues in the municipality given the proposal involved relocating the existing EGMs from the Pakenham Sports Club and transferring 22 EGMs from the Cardinia Club to the new venue. This approval did not include a condition relating to community contributions. A Section 173 Agreement between Council and the venue operator requires a contribution of \$75,000 from Club Officer to the Applicant's Community Grants Fund.
8. Club Officer commenced gaming operations in the 2016 Financial Year.
9. In December 2017 the VCGLR refused an application to increase the number of EGMs at the proposal site by 20 from 60 to 80 EGMs. The Applicant's rationale for this proposal was that the revenue generated from the additional EGMs would fund upgrades at the Cardinia Club in Pakenham which is the second gaming venue operated by the Applicant in Cardinia Shire. This proposal involved a proposed condition to include a community contribution of \$100,000 per annum while the EGMs were in operation at the venue. This would have involved increasing the quantum in the Section 173 Agreement from \$75,000 and would have secured these contributions through a condition in the gaming licence. Key points identified in the Notice of Decision included the following:
 - Points noted by the Commission:
 - There was no evidence before the Commission that the goods and services required for the works would be procured within Cardinia Shire (para 58).
 - The projected increase in complementary expenditure of \$850,000 (at the Cardinia Club) was not significant in the context of the municipality as a whole (para 62).
 - The scale of the benefit of the additional 3.05 FTEs should be given no weight (para 68).
 - The Applicant's current share of EGM entitlements in the municipality was 'large' (para 84).
 - The size of the gaming lounge was 'middle to upper middle, verging on a large range (para 97).
 - Residents coming from within a 5 kilometre radius of the venue (the Pakenham precinct) had a level of socio-economic disadvantage and financial vulnerability that would make them more susceptible to gambling harms (para 115). Communities characterised by socio-economic disadvantage and greater vulnerability are more susceptible to the harms arising from problem gambling (para 102).
 - The venue is in a growth area and therefore the exact risk profile of future patrons remains unclear (para 116).
 - Expenditure associated with the proposal would come from new expenditure (para 114) [which accounts for 60 per cent of the gross expenditure].
 - Facilities such as a function room were currently available in the municipality (para 130).

- Points noted by the Applicant:
 - At the time (nine years ago), the premises was a new venue that did not require updating or improvement (para 59).

2.2 The Applicant

10. Cranbourne Pakenham Racing Club Incorporated, which merged to form Southside Racing, operates five venues, three of which are in Cardinia Shire and two of which are gaming venues with a total of 165 EGMs:

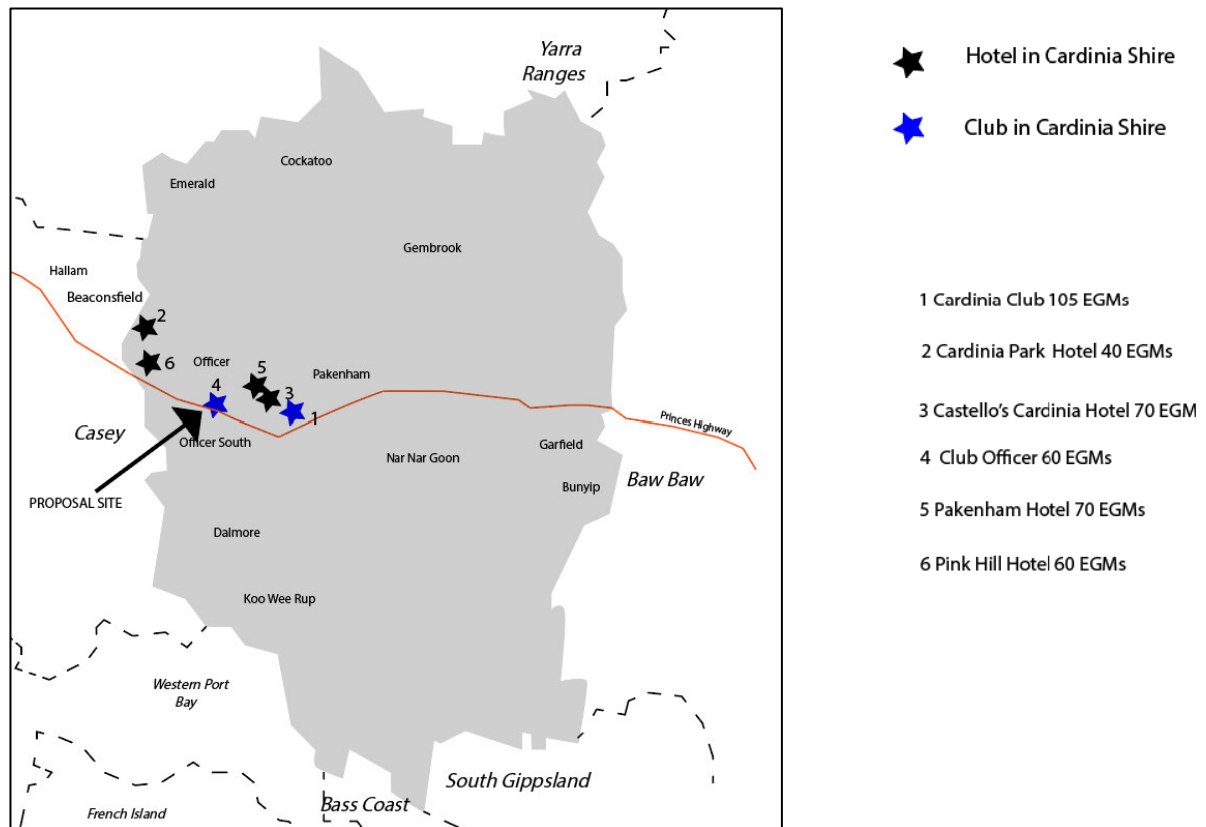
- Club Officer, 3 Niki Place, Officer, 60 EGMs (the venue, Cardinia Shire):
- Cardinia Club, 71 Racecourse Road, Pakenham, 105 EGMs, (Cardinia Shire)
- Sportsbet Pakenham, 420 Nar Nar Goon-Langwarry Road, Tynong (Cardinia Shire).
- Cranbourne Racecourse (City of Casey)
- Silks Cranbourne, 147 South Gippsland Highway, Cranbourne (City of Casey)

2.3 The proposal site

2.3.1 Location

11. The proposal site is located in Cardinia Shire which is bounded by Yarra Ranges Shire to the north, the City of Casey to the west, the Shires of Bass Coast and South Gippsland to the south and the Shire of Baw Baw to the east (refer to Figure 1).
12. It is situated at 3 Niki Place, Officer, just north of the Cardinia Road offramp from the Princes Freeway.

Figure 1 - Location of proposal site



Source: SymPlan, VGCC and i.d consulting

2.3.2 Land use mix

Adjoining

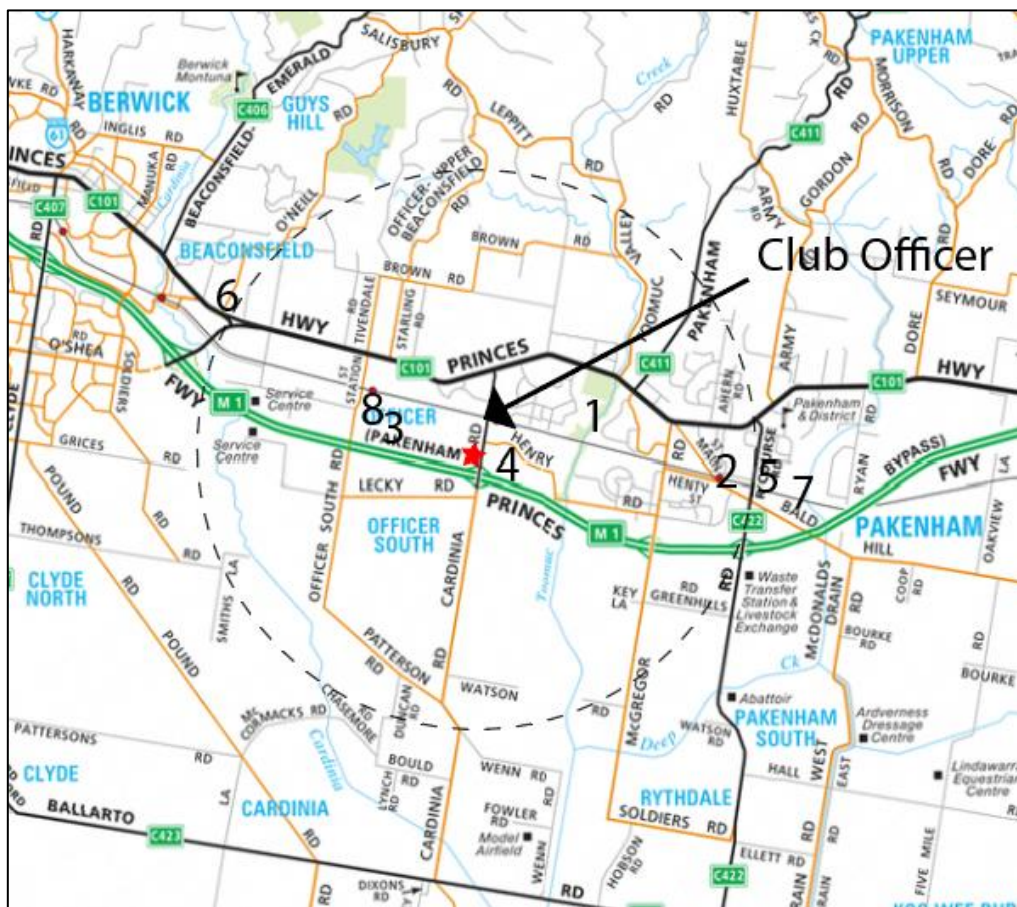
13. The proposal site is adjoined by the following land uses

- Early learning centre to the north (currently under construction).
- Waterway to the west with walking paths connecting to the surrounding residential areas, shopping centre and Cardinia Road Station.

Surrounding

14. The predominant land use within the proposal site's primary catchment is residential.
15. The Lakeside Square shopping complex consisting of a Woolworths supermarket, chemist and other facilities servicing the community's day to day needs is located approximately 450m to the north-east of Club Officer.
16. Cardinia Road Station is located approximately 580m north-east of the proposal site.
17. There are several function facilities located within (or just beyond) the proposal site's secondary catchment. The Council facilities have function rooms available for one-off private event venue hire, subject to Council approval (refer to Figure 2).
18. The Officer Community Hub is located approximately 2 kilometres to the west of the proposal site.

Figure 2 – Function facilities



Map ref	Location	Address	Capacity	Ownership/ management
1	Cardinia Cultural Centre	40 Lakeside Blvd, Pakenham	Lakeview Room accommodates up to 500 people (standing) or 300 people (seated)	Council
2	Pakenham Hall	6E Henry Street, Pakenham	Up to 350 people	Council
3	Comely Banks Northern Community Room	125 Bridge Road, Officer	Up to 60 people	Council
4	James Bathe Community Rooms	67 Caversham Drive, Pakenham	Up to 100 people	Council
5	5 Cardinia Club	71 Racecourse Road Pakenham	Up to 100 people	Applicant
6	Beaconsfield Community Complex	8 O'Neil Road, Beaconsfield	Up to 200 people	Council
7	Deep Creek Reserve Centre - Function Room	62 Cameron Way, Pakenham	Up to 250 people (standing) or up to 170 people seated	Council
8	Officer Community Hub	2 Parker Street Officer	Capacities not specified	Council (operated by a third-party contractor)

Source: Cardinia Shire Council

2.4 Venue services and facilities

19. The venue provides the following facilities (refer to Figure 3):

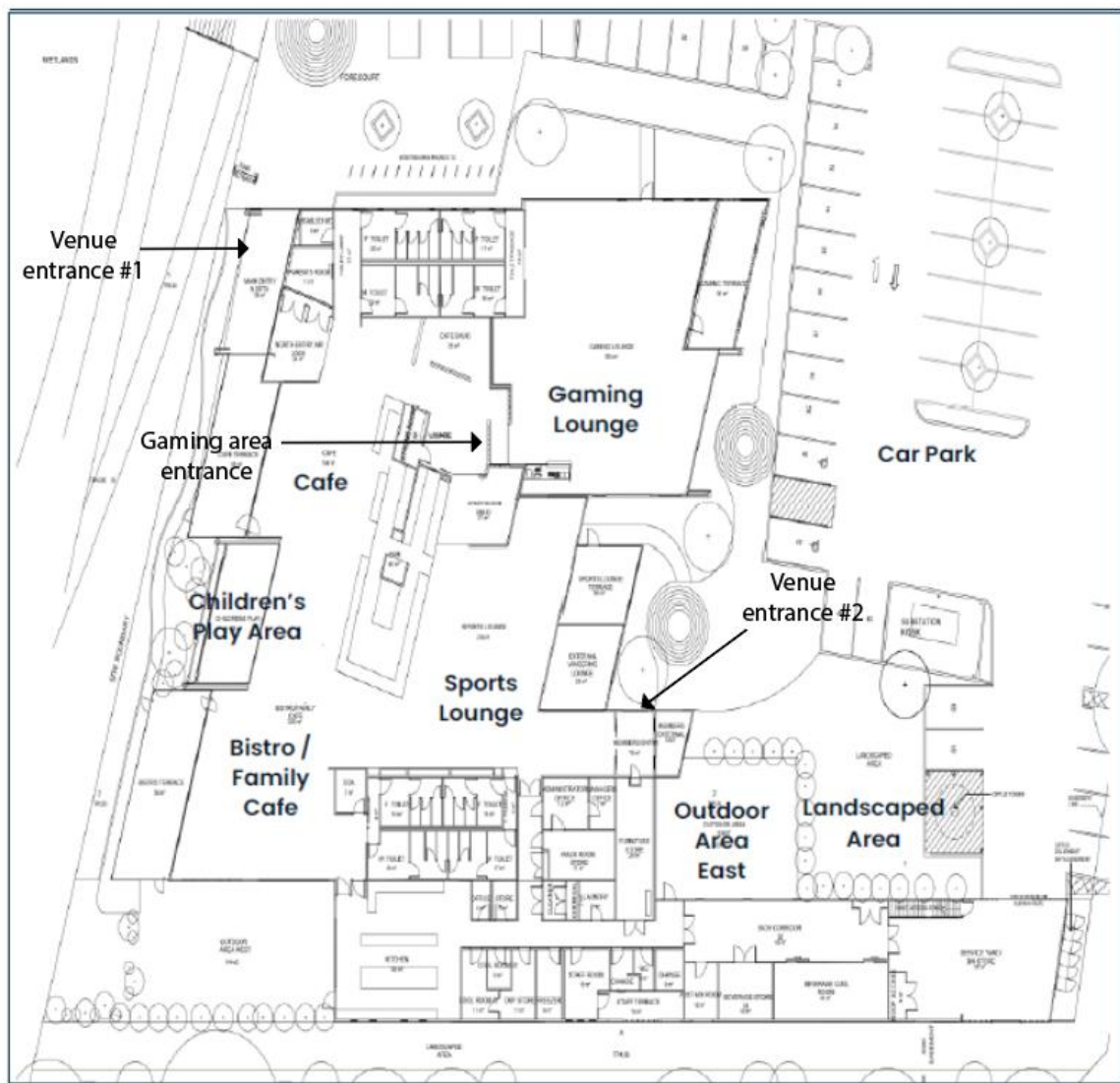
- Bistro seating 250 people
- Café
- Two small lounges adjoining the gaming area
- Deck areas
- Sport bar and TAB area
- Children's play area
- Gaming area with 60 EGMs

2.5 Venue layout

20. There is one operable external entrance to the venue, off the northern carpark. The rear 'members only' external entrance off the eastern carpark is currently closed (refer to Figure 3, entrances #1 and #2 respectively).

21. There is one internal entrance to the gaming area (refer to Figure 3).

Figure 3 – Venue Layout



Source: SymPlan and Urbis SEIA

22. The entrance to the gaming area is partially screened. Views into the gaming area from the reception area are apparent from the unscreened internal entrance to the gaming area, one of the windows off the eastern car park and the outdoor seating area to the east of the gaming area.

2.6 Venue operations

Responsible service of gambling

23. The venue Rewards Program provides members with certain benefits and rewards that can be collected and redeemed at any of Southside Racing's hospitality venues including Sportsbet Pakenham, Cardinia Club and Club Officer. Points are accrued for non-gaming and gaming turnover at an EGM operated by the Applicant in any of its venues. These points cannot be used as credit on EGMs. Members receive marketing material including EGM advertising in connection with EGMs operated by the applicant unless consent is denied on the membership application form.
24. The Southside Racing Handbook indicates that snacks and beverages can be ordered in the gaming area.

25. The Leigh Barrett and Associates Harm Minimisation and Code of Conduct Policies and Procedures Club Officer document stipulates the following:

- None of the staff are permitted to use an EGM at any time.
- Food and beverages will not be supplied to any patron seated or standing at, or using an EGM. The food and beverage will be collected from a designated area away from the EGM.

Community contributions and community benefit statement claims

26. The Urbis SEIA provides a breakdown of the venue's community contributions for the previous two financial years. In the 2023-24 Financial Year and 2024-25 Financial Year the Applicant allocated \$214,070 and \$263,540 to organisations in Cardinia Shire through its community investment program respectively (Urbis SEIA page 11).

27. The application documentation includes a high-level proportional breakdown indicating that community contributions consist of both cash and in-kind support. The documentation does not specify exact figures for either category or define what is included in 'minor grants', 'prize donations' or 'discretionary contributions'.

28. Analysis of the 'key community contributions' information in Appendix A of the Urbis SEIA indicates the following (refer to Table 1):

- The largest proportion relates to major grants, prize donations and discretionary contributions.
- The value of key community contributions in the 2024-25 Financial Year was lower than the value of key community contributions in the 2023-24 Financial Year.
- The proportion of non 'key community contributions' was higher in the 2024-25 Financial year than it was in the 2023-24 Financial Year.

Table 1 – Breakdown of community contributions, 2023-24 and 2024-25

Financial Year	Value of key community contributions ¹	Total value of total community contributions ²	Proportion of key community contributions (cash)	Proportion of non 'key community contributions' (including in-kind and minor contributions)
2023-24	\$86,750	\$214,070	40.5	59.5
2024-25	\$62,320	\$263,540	23.6	76.4

Source: Urbis SEIA

29. Given the information under 'future community contributions' in the Urbis SEIA (page 12) it is possible the level of community contributions is inclusive of both cash and in-kind.

30. Table 2 provides a breakdown of the claims on the venue's Community Benefit Statements for the full year before the shutdowns caused by the COVID-19 Pandemic and the three years following the reopening of the venues following the COVID-19 Pandemic. Analysis of the data indicates that since the 2018-19 Financial Year:

- The applicant has consistently claimed more than 90 per cent for Class B operating expenses and nothing for Class C expenses associated with funding service provision for people affected by gambling harm or reimbursement of volunteers' expenses.

¹ Appendix A Urbis SEIA

² Urbis SEIA page 11

- There has been an overall increase in the total value of the claims since 2018-19.
- There has been an overall decrease in the value of Class A claims, and the proportion of total claims apportioned to Class A claims

Table 2 – Club Officer Community Benefit Statement claims, 2018-19 and 2022-23 to 2024-25

Class	2018-19		2022-23		2023-24		2024-25		Per cent change 2018-19 to 2024-25 (\$)
	Total	per cent total	Total	per cent total	Total	per cent total	Total	per cent total	
A	\$125,728	8.81	\$28,498	2.04	\$80,433	5.75	\$102,576	7.07	-18.4
B	\$1,300,741	91.1	\$1,371,392	97.7	\$1,317,705	94.3	\$1,347,448	92.9	3.6
C	\$0	0	\$0	0	\$0	0	\$0	0	0
Total	\$1,426,469	100	\$1,399,890	100	\$1,398,138	100	\$1,450,024	100	1.7

Source: VGCCC

Class A: Donations, gifts and sponsorship (including cash, goods and services) to another person resident in Victoria, not including to the club itself.

Class B: Capital expenditure, financing costs, retained earnings, the provision of buildings, plant or equipment over \$10,000 per item excluding gaming equipment or the gaming machine area of the venue.

Class C: The provision of responsible gambling measures and activities but not excluding those required by law, reimbursement of expenses reasonably incurred by volunteers, CBS preparation and auditing expenses.

Hours of operation

31. Hours of operation are:

- Gaming area: Sunday to Wednesday 10am to 2am, Thursday to Saturday 10am to 3am.
- Bistro: Monday to Thursday 12 noon to 2pm and 5pm to 8.30pm, Friday to Sunday 12 noon – 2.30pm and 5pm to 9pm
- Reception desk: The Urbis SEIA indicates this is always staffed.

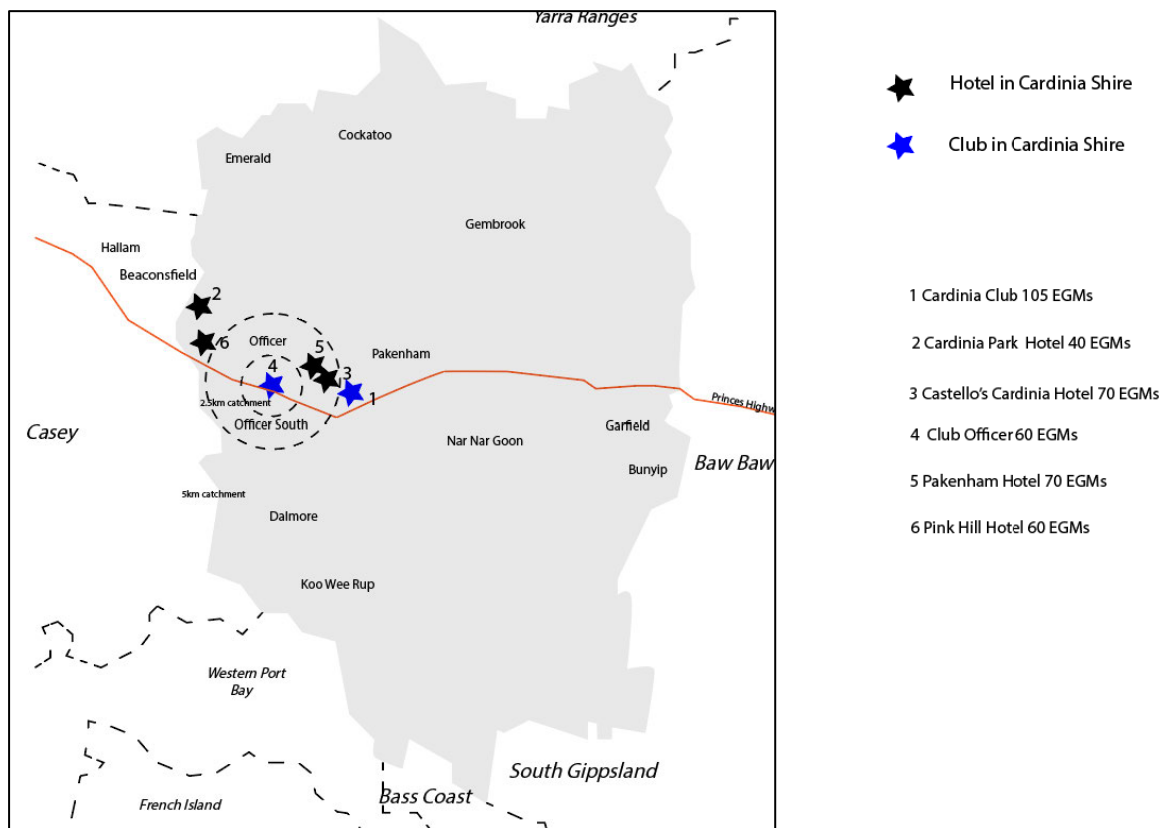
2.7 Venue catchment and patron profile

2.7.1 Catchments

32. The suburbs in the venue's 2.5 kilometre and 5 kilometre catchment include Officer, Officer South and Pakenham (refer to Figure 4).

33. There are no other gaming venues in the proposal site's primary catchment and two in the proposal site's secondary catchment (Refer to Figure 4).

Figure 4 – Gaming venues in proposal site's primary and secondary catchments



Source: SymPlan, Google Maps and VGCCC

2.7.2 Patron Profile

34. The Urbis SEIA (page 15) indicates nearly three quarters (73 per cent) of the gaming area patrons resided within Cardinia Shire.

35. A breakdown of where the gaming area patrons reside indicates close to half (40 per cent) reside in Pakenham, followed by Officer where nearly a quarter (24 per cent) reside (refer to Table 3).

Table 3 – Origin of gaming area patrons 4 August 2025 – 18 August 2025

Suburb	LGA	Number of patrons	Per cent of total patrons
Pakenham	Cardinia Shire	211	39
Officer	Cardinia Shire	129	24
Berwick	City of Casey	46	8
Beaconsfield (Vic.)	Cardinia Shire	18	3
Narre Warren	City of Casey	14	3
Cranbourne	City of Casey	11	2
Rowville	City of Knox	6	1
Officer South	Cardinia Shire	5	1
Koo Wee Rup	Cardinia Shire	5	1
Other Suburbs		97	18
Respondents from Cardinia		389	72
Total Respondents		542	100

Source: Urbis SEIA

3 The proposal

36. Key aspects of the proposal include the following (refer to Table 4 and Figure 5). These details are sourced from the application documentation.
37. Key changes associated with the proposal can be summarised as follows (refer to Figures 3 and 5):
- Increase in the number of EGMs from 60 to 80.
 - Expansion of the gaming area which results in a smaller dedicated outdoor smoking area.
 - Conversion of the outdoor area and adjacent landscaped area to the east of the venue into a covered function room.
 - Creation of an additional entrance into the gaming area.
38. The Urbis SEIA states the proposed upgrades are contingent on the approval of the additional 20 EGMs.

Table 4 - Proposal

Factor	Details
Number of venues:	No change.
Number of EGMs:	Net increase of 20 EGMs from 60 to 80, at the venue and in Cardinia Shire. This would result in the applicant's share of EGMs in the municipality increasing from 41 per cent to 44 per cent.
Operating hours:	Gaming area: Sunday to Wednesday 10am to 2am, Thursday to Saturday 10am to 3am. Bistro: Monday to Thursday 12 noon to 2pm and 5pm to 8.30pm, Friday to Sunday 12 noon – 2.30pm and 5pm to 9pm
Additional patrons:	Increase in approximately 250-350 patrons, of which 130-170 (approximately 33 percent) would primarily attend for hospitality, sports bar and social purposes.
Additional gross gaming player loss:	\$1,105,720 - \$1,351,435 in the first 12 months of trade.
Transferred player loss:	45 per cent i.e. 55 per cent will be new player loss. There is no information in the application documentation relating to the source of transferred player loss.
Net increase in gaming player loss:	\$608,146 to \$743,289 in the first 12 months of trade.
Supply contracts:	Approximately \$546,000 in the first 12 months of trade, of which 33 per cent would be attributed to gaming (source: signed application form).
Internal complementary expenditure:	Approximately \$725,000 in the first 12 months of trade (source: signed application form).
External complementary expenditure:	No information provided
Capital expenditure:	\$6.1 million.

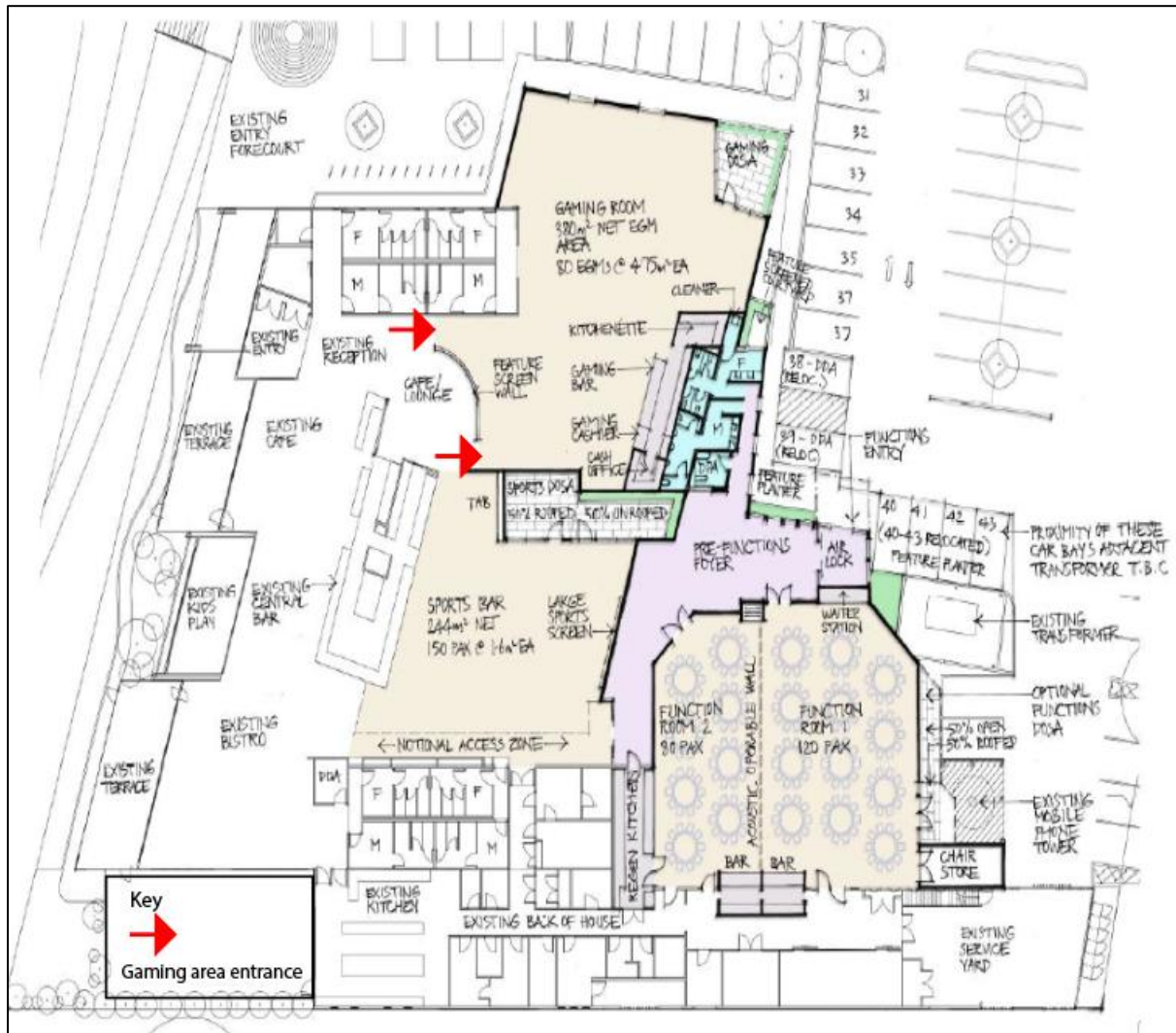
Factor	Details
Employment:	<p>Short term: Approximately 32</p> <p>Long term: An increase of 5.5 full-time equivalent employees will be required across the venue of which 1.9 FTE are associated with the increase in the number of EGMs. It is suggested some of these jobs are likely to be filled by local residents.</p>
Proposed services and facilities:	<p>Repurposing of existing outdoor and landscaped areas into a function room for 200 people which includes the addition of a pre-function foyer area. The function space would be serviced by a satellite kitchen and bar, a storage room and a change room.</p> <p>An entry off the eastern car park to the pre-function foyer.</p>
Upgrades:	<p>The Urbis SEIA on page 8 indicates the gaming area 'has capacity to accommodate the additional machines without further expansion' but states on page 12 that 'other changes as part of the redevelopment include reconfiguration and extension of the gaming area to accommodate the additional machines. The proposed venue plan (Figure 5) indicates the gaming area would expand and cover part of the existing café/lounge and the dedicated outdoor smoking area.</p> <p>Other upgrades include repositioning of the cashier, installation of CCTV coverage and repointing existing cameras, introduction of a bar and kitchenette to the gambling area.</p>
Community contributions:	<p>The Urbis SEIA (page 12) indicates the proposal involves maintaining 'this level of support' [around \$210,000 to \$260,000]. This is confirmed on page 36 of the Urbis SEIA which indicates 'there is no specific commitment to increase contributions based directly on the outcome of this application.'</p> <p>In the absence of information to the contrary, it is assumed these values are inclusive of both cash and in-kind contributions.</p>
Density:	<p>Increase from 4.1 per cent to between 4.2 per cent³ and 4.4 per cent⁴ across the municipality. This represents a 4.91 per cent increase.⁵</p>

³ Urbis SEIA

⁴ Onyx Compliance Report

⁵ VGCCC E&S Report April 2026

Figure 5 – Proposal details



Source: Urbis SEIA and SymPlan

4 Project context

39. This section describes the community, gaming and strategic context within which the proposal site is located and the venue operates.

4.1 Population size and growth

40. In 2021 the estimated resident population of Cardinia Shire was 119,573. By 2051, this is forecast to increase to 203,880 people. The period of largest growth is expected to occur between 2026 and 2031, when the population is forecast to increase by 18,483 people.⁶

41. Officer and Officer South are forecast to experience the largest increase in population. These areas are expected to grow by 6,870 people from 19,950 in 2021 to 46,820 people by 2051, representing 31.87 per cent of the municipality's population growth.⁷ These two suburbs are located in the proposal site's secondary catchment.

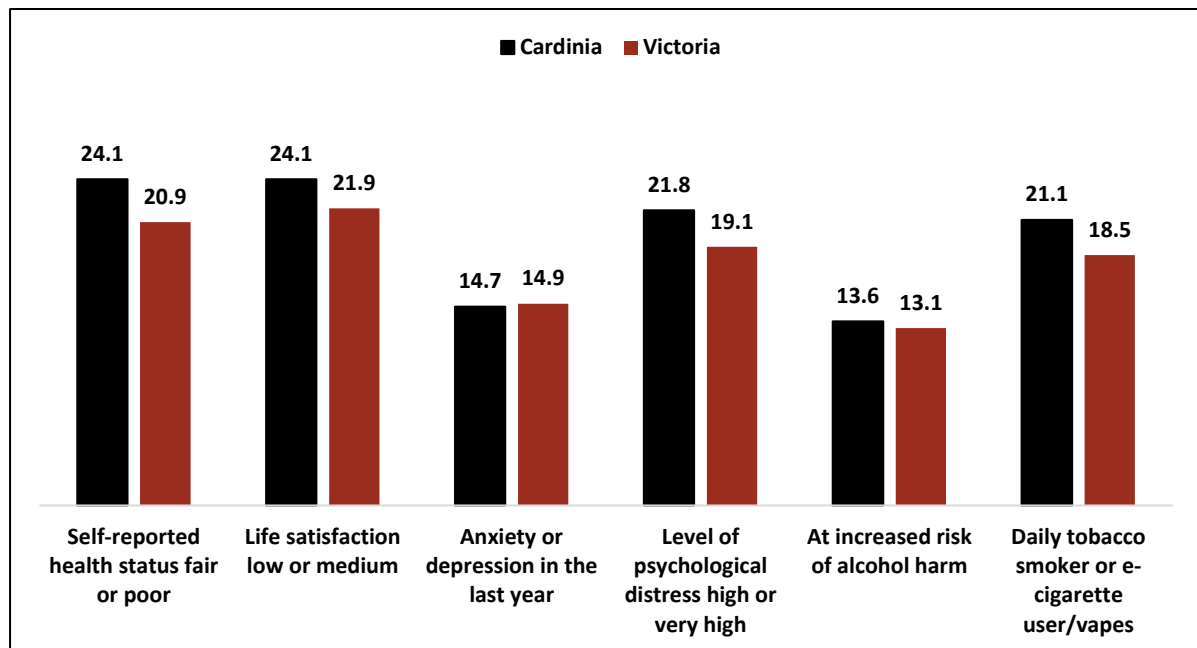
4.2 Health and wellbeing

4.2.1 Health indicators

42. Compared to Victoria, Cardinia Shire has (refer to Figure 6):

- A higher proportion of people with compromised self-reported health status and life satisfaction, high or very high level of psychological distress, and daily tobacco smokers or e-cigarette/vape users.
- Similar proportion of people with anxiety or depression in the last year and at increased risk of alcohol harm.

Figure 6 – Key health indicators, Cardinia Shire and Victoria



Source: Victorian Population Health Survey 2023

⁶ www.remplan.comm.au/cardinia

⁷ www.remplan.com.au/cardnia

4.2.2 Crime and safety

43. In September 2025, relative to metropolitan municipalities and Victoria, Cardinia Shire had a higher rate of crimes against the person, property and deception offences, drug offences, public order and security offences, justice procedures offences and other offences.⁸
44. In December 2025, Cardinia Shire had (refer to Table 5):
- A lower rate of criminal incidents and family incidents per 100,000 people compared to average for the adjoining municipalities.
 - A lower rate of criminal incidents per 100,000 people compared to the average for the adjoining municipalities and Southern Metro Region
 - A higher rate of family incidents per 100,000 people compared to the average for the Southern Metro Region and a lower rate compared to the adjoining municipalities.
45. Between December 2021 and December 2025 Cardinia Shire experienced a 27.1 per cent increase in the rate of criminal incidents per 100,000 people and an 8 per cent increase in the rate of family incidents per 100,000 people. These increases were higher than the average for the adjoining municipalities but lower than the rates in the Southern Metro Region (refer to Table 5).

Table 5 – Criminal and family incidents per 100,000, Cardinia Shire, adjoining municipalities and Southern Metro Region, December 2025

Benchmark	December 2025		Per cent growth December 2021 to December 2025	
	Criminal incidents per 100,000 people	Family incidents per 100,000 people	Criminal incidents per 100,000 people	Family incidents per 100,000 people
Cardinia	4,967.7	1,476.3	27.1	8.0
Casey	5,486.1	1,612.7	41.5	15.1
Yarra Ranges	3,669.3	1,289.2	12.8	11.9
Bass Coast	5,813.7	1,931.1	10.5	-14.6
Baw Baw	5,916.8	1,918.9	9.5	9.6
<i>Average adjoining municipalities</i>	<i>5,170.7</i>	<i>1,645.6</i>	<i>20.3</i>	<i>6.0</i>
<i>Southern Metro</i>	<i>6,590.5</i>	<i>1,393.3</i>	<i>33.3</i>	<i>10.1</i>

Source: Crime Statistics Agency Victoria

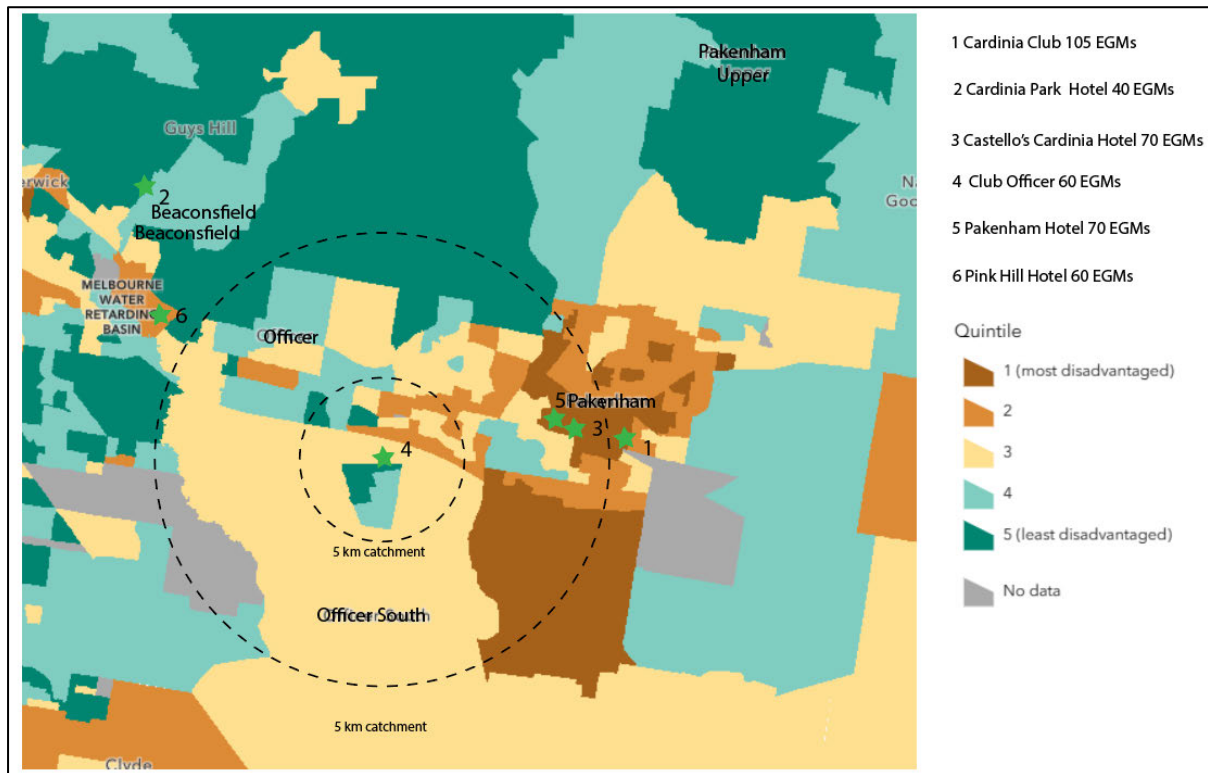
4.2.3 Socio-economic disadvantage

46. The equivalised household income in the proposal site's primary 2.5 kilometre catchment is lower than that of Cardinia Sire, all metropolitan municipalities and Victoria.⁹
47. The community in the proposal site's primary and secondary catchments displays mixed levels of socio-economic disadvantage. The community directly to the north of the proposal site in the primary catchment and east of the proposal site in the secondary catchment has higher levels of socio-economic disadvantage relative to the community to the west of the proposal site (refer to Figure 7).

⁸ VGCCC E&S Report April 2026

⁹ VGCCC E&S Report April 2026

Figure 7 - Socio-economic disadvantage in the proposal site's primary and secondary catchments



Source: SymPlan and ABS Census of Population and Housing, 2021

48. Pakenham/Pakenham South/Pakenham Upper followed by Officer/Officer South had the most selected welfare payments in the municipality (6,090 and 2,080 respectively) and the highest proportion of Cardinia Shire's selected welfare recipients (55.5 and 18.9 per cent respectively). Refer to Table 6.

Table 6 - Selected welfare payments, Cardinia Shire December 2025

Postcode and locality	C'wealth rent assistance	Jobseeker Payment	Low Income Card	Total selected	% of total Cardinia
3813 — Nar Nar Goon / Nar Nar Goon North	30	25	25	80	0.7
3808 — Beaconsfield Upper	30	30	45	105	1.0
3814 — Tynong / Tynong North	65	60	40	165	1.5
3815 — Bunyip / Garfield / Tonimbuk	90	70	50	210	1.9
3781 — Cockatoo / Avonsleigh	85	120	55	260	2.4
3812 — Pakenham East (growth area)	175	110	40	325	3.0
3981 — Koo Wee Rup / Koo Wee Rup North / Bayles	200	150	60	410	3.7
3807 — Beaconsfield / Guys Hill	285	155	95	535	4.9
3984 — Lang Lang / Lang Lang East	475	340	160	975	8.9

Postcode and locality	C'wealth rent assistance	Jobseeker Payment	Low Income Card	Total selected	% of total Cardinia
3809 - Officer/Officer South	1,290	545	245	2,080	18.9
3810 — Pakenham / Pakenham South / Pakenham Upper	3,350	2,095	645	6,090	55.3
Cardinia	5,900	3,640	1,465	11,005	100.0

Source: DSS [DSS Benefit and Payment Recipient Demographics - quarterly data - Dataset - data.gov.au](#)

49. The area with the highest proportion of people renting from government and community housing providers is Pakenham - South West.¹⁰

4.3 Gaming

4.3.1 EGMs and gaming venues

50. There are currently six gaming venues and 405 attached EGM entitlements in Cardinia Shire. The municipality currently operates 168 EGMs below the municipal cap of 573 EGMs.

51. The 2 clubs operate 165 EGMs, and four hotels operate 240 EGMs.

4.3.2 Key gaming indicators

52. In the Financial Year 2024-25, relative to metropolitan municipalities, Cardinia Shire had (refer to Table 7):

- a similar employment rate and SEIFA Score of Disadvantage
- a lower total player loss, player loss per EGM, density of EGMs per 1000, adults, player loss per adult, expenditure per venue and more adults per venue
- larger venue size.

Table 7 – Key gaming indicators, Cardinia Shire and metropolitan municipalities (2024-25)

Indicator	Cardinia Shire	Average metro councils
Player loss	\$39,473,887.76	\$78,064,151.34
SEIFA DIS Score	1,020.96	1,026.30
Adults per Venue	16,538	15,705
EGMs per 1,000 adults	4.1	4.5
EGM player loss per adult	\$398	\$559
Unemployment rate	4.1 per cent	4.0 per cent
EGMs	405	617
Venues	6	10
Player loss per attached EGM	\$97,466	\$126,522
Average venue size	68	62
Player loss per venue	\$6,578,981	\$7,806,415

	Less risky relative to metropolitan municipalities
	More risky relative to metropolitan municipalities
	Similar to metropolitan municipalities

Source: VGCCC

¹⁰ www.remplan.com.au/cardinia

4.3.3 Player loss

Municipal

53. Between the 2022-23 (the year the Pink Hill Hotel opened) and 2024-25 Financial Years, total EGM loss and loss per adult increased at significantly higher levels (12.6 per cent and 8.3 per cent) compared to adult population growth (4 per cent). Refer to Table 8.
54. These differences are even greater for changes in indicators between 2021-22 to 2024-25 Financial Years (the full year following the opening of the gaming venues after the COVID-19 Pandemic). Refer to Table 8.

Table 8 – Change in indicators, Cardinia Shire, 2021-22 to 2024-25

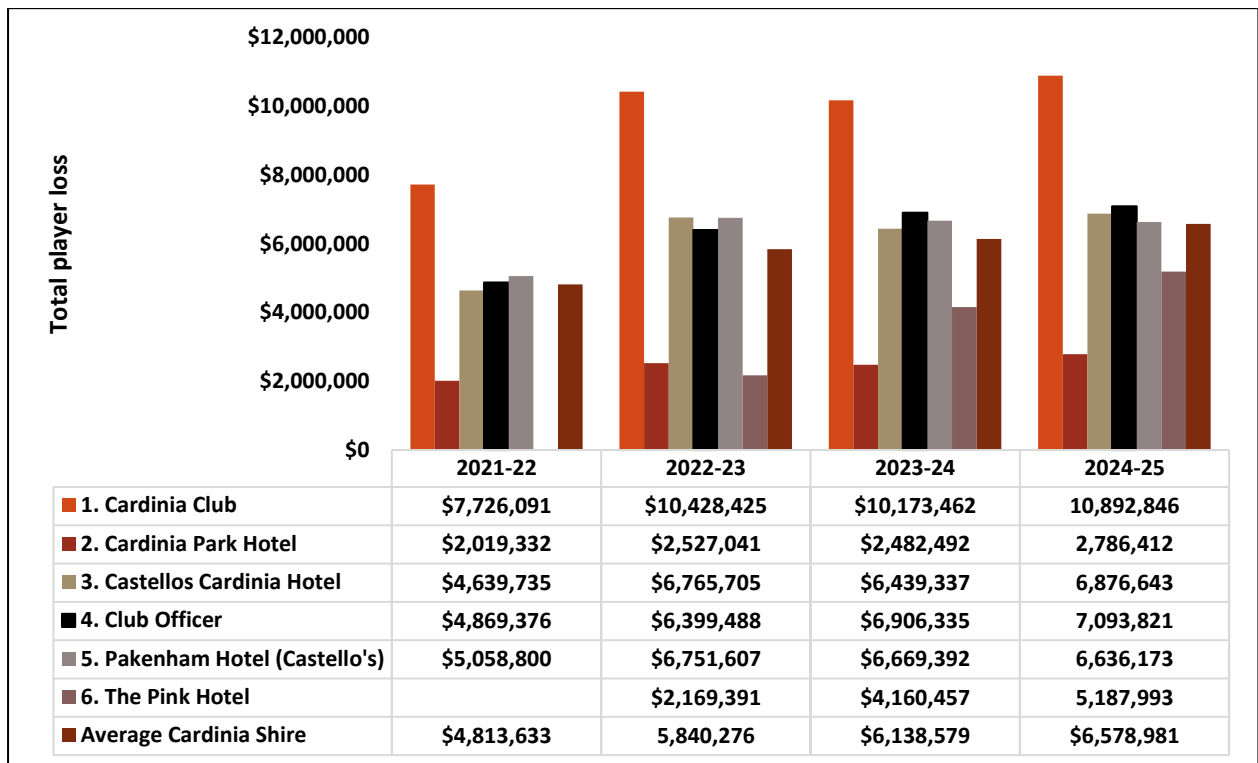
Indicator	2021-2022	2022-23	2023-24	2024-25	% change 2022-23 to 2024- 25	% change 2021-22 to 2024- 25
Total EGM loss	\$24,313,334	\$35,041,657	\$36,831,475	\$39,473,888	12.6	62.4
Adult Population	92,419	95,404	96,787	99,229	4.0	7.4
Adults per Venue	18,484	15,901	16,131	16,538	4.0	-10.5
EGMs per 1,000	3.7	4.2	4.2	4.1	-3.9	9.3
Loss per Adult	\$263	\$367	\$381	\$398	8.3	51.2

Source: VGCCC

Club Officer

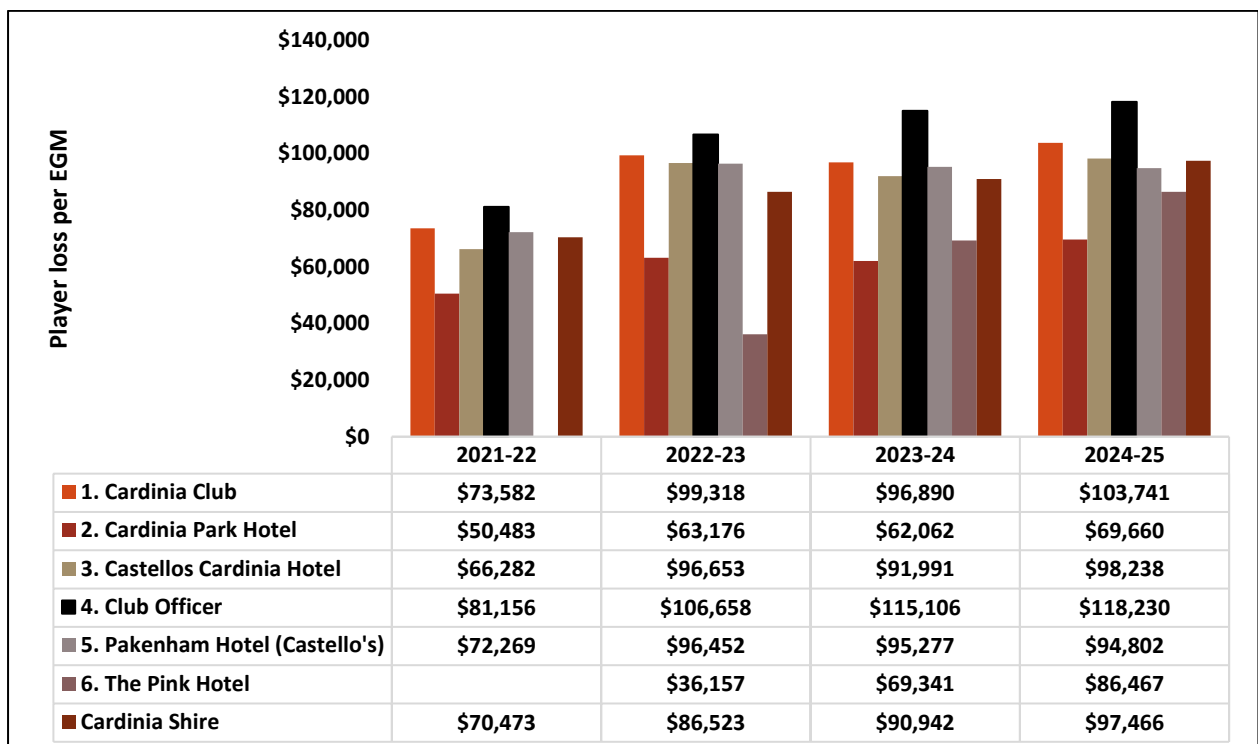
55. The following player loss factors indicate the EGMs at Club Officer are being used intensely compared to other venues in the municipality, and more intensely than they have in previous years:
- Club Officer has had the second highest total player loss in the previous two Financial Years (after the Cardinia Club which has the most EGMs and is operated by the Applicant) (refer to Figure 8).
 - Club Officer has had the highest player loss per attached EGM in the municipality in the past four financial years (refer to Figure 9).
 - Club Officer experienced a higher per cent increase in player loss per EGM compared to Cardinia Shire between the 2021-22 to 2024-25 Financial Years (refer to Figure 10).

Figure 8 – Total player loss, venues and Cardinia Shire, 2021-22 to 2024-25



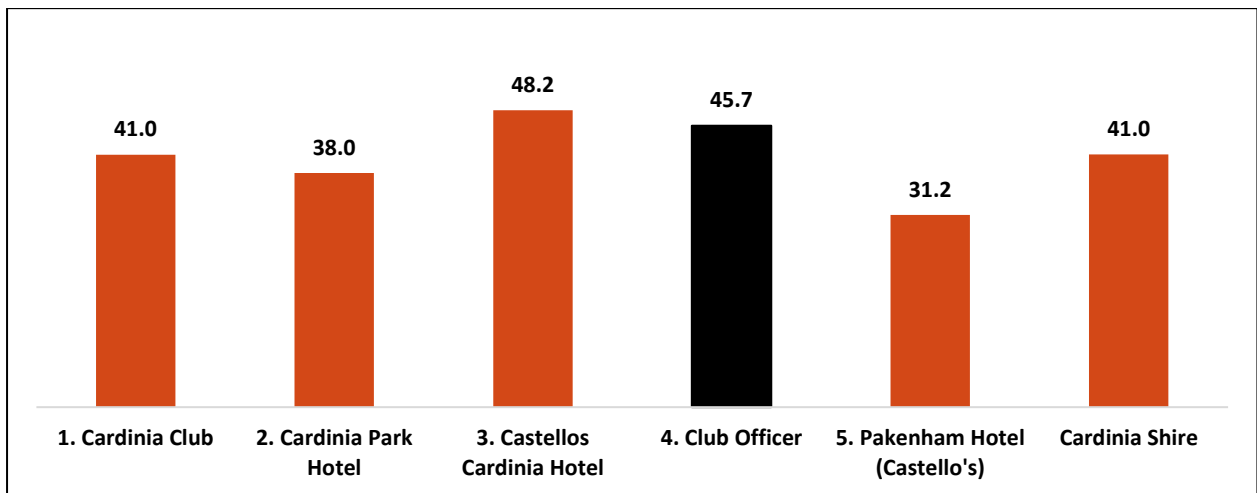
Source: VGCCC

Figure 9 – Player loss per EGM, venues and Cardinia Shire, 2021-22 to 2024-25



Source: VGCCC

Figure 10 – Per cent change in total player loss, 2021-22 to 2024-25, venues



Source: VGCCC

NOTE: The Pink Hill Hotel has been excluded in the analysis as it commenced operations in the 2022-23 Financial Year.

4.4 Strategic

4.4.1 Cardinia Shire Liveability Plan 2017-2029

56. Outcome 7 of the Cardinia Shire Liveability Plan 2017-2029 is a reduction in harm from gambling. This outcome is supported by the objective to decrease exposure to gambling.

4.4.2 Cardinia Shire Gambling Harm Prevention and Minimisation Policy 2024

57. One of the principles underpinning this Policy is that, whilst gambling is a legal activity, for some it can lead to harmful consequences, not only for the individual gambler, but also for their family, friends, and wider community. This Policy acknowledges the significant health, social and economic impacts gambling can have on the Cardinia Shire community.

58. This Policy outlines Council's approach and commitment to minimising and preventing the negative impacts and harms caused by gambling.

59. One of the key purposes of this Policy is to provide clear direction for Council's approach to assessing the social and economic impacts of applications for EGMs.

60. The Policy identifies Council's roles and responsibilities in ensuring the municipality is planned and governed in a way that achieves the best outcomes for the community in line with the provisions in *Gambling Regulation Act 2003*, the *Public Health and Wellbeing Act 2008*, the *Planning and Environment Act 1987*, and the *Local Government Act 2020*.

61. Key actions in this Policy include:

1.2 Oppose applications for new EGMs if the proposal has the potential to elevate the risk of gambling harm within vulnerable communities (Planning and Regulation Pillar).

2.1 Apply a public health approach to harm prevention and minimisation and focus on collaborative action with other levels of government, peak bodies, local service providers, community partners and other councils (Leadership and Advocacy Pillar).

4.1 Provide public notice to the community when there is an application for new EGM licences, an increase in or transfer of EGMs, consult where applicable and publish copies of all gambling related submissions it makes on Council's website (Research and Engagement Pillar).

4.4.3 Clause 52.28 Gaming, Cardinia Planning Scheme

62. The purpose of Clause 52.28 Gaming is to ensure EGMs are situated in appropriate locations and premises.
63. The schedule to Clause 52.28 Gaming guides the location and operation of gaming venues and EGMs in the municipality. The proposal site is not located in a strip shopping centre or one of the nominated shopping complexes within which EGMs are prohibited.
64. Key outcomes expressed in the objectives and decision guidelines in this clause include the following:
- Protect vulnerable communities from the harmful impacts of gambling.
 - Minimise the risk of gambling harm while maximising the opportunities for EGMs to result in positive social, economic and environmental outcomes.
 - Prevent convenience gambling and minimise exposure to gambling in the gaming venue.
 - Protect the amenity of the surrounding area.
 - Maximise access to non-gambling activities and facilities in the venue and in the surrounding area in established and emerging communities.

5 Social and Economic Impact Assessment

65. This section discusses the potential social and economic impacts of the proposal.

5.1 Framework

66. The social and economic impact assessment in this section presented in Tables 12 and 13 is informed by the following:

- The theoretical framework provided in Appendices 2 and 3.
- Specific features of the venue and proposal outlined in Sections 2 and 3.
- The context within which the proposal site operates presented in Section 4.
- The potential for the proposal to cause or exacerbate existing and potential vulnerability to gambling harm in discussed in Section 5.2.
- The extent to which protective and risk factors outlined in Section 5.3 would cause or exacerbate existing and potential vulnerability to gambling harm.

67. The rationale for the weighting of social and economic impacts in Tables 12 and 13 is outlined in Table 9. It has been adapted from the methodology guiding an Environmental Effects Statement.¹¹ It is also informed by my professional judgement and experience in the preparation of social and economic impact assessments for gaming proposals.

Table 9 – Weighting of social and economic impacts

Weighting	Social and economic impact	
	Potential change	Implications of risk and protective factors
Neutral	No change occurs and therefore no impact will result.	N/A
Negligible	Changes result in impact with little or no social or economic harm or benefit.	Protective factors offset risk factors.
Low	Changes result in social or economic impacts affecting a small number of people AND/OR individuals and community not vulnerable to gambling harm.	Risk factors mostly offset by protective factors.
Moderate	Changes result in social or economic impact affecting a moderate number of people AND/OR individuals and community have a mixed level of vulnerability to gambling harm.	Risk factors partially offset by protective factors.
Significant	Changes result in social or economic impact affecting a large number of people AND/OR individuals and community on balance have a high level of vulnerability to gambling harm.	Risk factors cannot be offset by protective factors.

¹¹ <https://www.planning.vic.gov.au/environmental-assessments/environmental-assessment-guides/use-of-risk-and-impact-assessment-in-an-ees>

5.2 Vulnerability to gambling harm in Cardinia Shire

68. This section describes the extent to which the municipality and the community in the venue's catchments are vulnerable to gambling harm.
69. Where relevant, the discussion draws on key aspects of the project context presented in Section 4.

5.2.1 Socio-economic, health and safety indicators of gambling harm

70. Appendix 4 summarises the socio-economic indicators of vulnerability to gambling harms in the municipality and the community in the proposal site's primary catchment.
71. Relative to the South East Metro Region, Cardinia Shire displays some indicators of vulnerability to gambling harm, particularly in relation to rental stress, health status and educational attainment.
72. Cardinia Shire has a higher rate of family incidents per 100,000 than the Southern Metro Region. The municipality experienced an increase in the rate of family incidents per 100,000 between December 2021 and December 2025.
73. Vulnerability to gambling harm in the proposal site's catchment is as follows:
- Other than cultural diversity, Officer displays few indicators of vulnerability to gambling harm relative to Cardinia Shire.
 - Pakenham/Pakenham South/Pakenham Upper followed by Officer/Officer South have a very high proportion of their residents receiving selected welfare payments.
 - Pakenham displays a significant number of indicators of vulnerability to gambling harm relative to Cardinia Shire. Forty per cent of the venue's patrons (the highest proportion) reside in Pakenham.
 - Berwick displays few indicators of vulnerability to gambling harm relative to the City of Casey.

5.2.2 Gambling indicators

74. Cardinia Shire experienced a significant increase in EGM player loss between the 2021-22 and 2024-25 Financial Years indicating a potential increase in gambling harm.
75. The two venues operated by the Applicant have had the highest EGM player loss in the municipality in the previous four financial years.
76. These gambling indicators suggest there it is likely there has been an increase in gambling harm in the municipality, and at the venues operated by the Applicant.

5.2.3 Indicative prevalence of gambling harm

77. The indicative prevalence of gambling harm in Cardinia Shire extrapolated in Table 10 is based on the research findings in Appendix 3. The data in this table are indicative only and provide a high level, theoretical perspective on the potential level of gambling harm in the municipality. They do not factor in municipality-specific data such as the relative vulnerability of the community to gambling harm or gambling indicators specific to the municipality such as EGM density and EGM player loss (total, per EGM and per venue) relative to metropolitan municipalities, adjoining municipalities or Victoria.

Table 10 – Indicative indicators of gambling harm in Cardinia Shire

Indicator	Assumption	Indicative Cardinia Shire impact
Existing		
Adults who gamble in Victoria ¹²	53.0%	52,591
Adults who gamble on EGM's in Victoria ¹³	11.0%	10,915
Low risk gamblers ¹⁴	5.3%	2,787
Moderate risk gamblers ¹⁵	2.3%	1,210
'Problem gamblers'	0.9%	473
Total gamblers experiencing harm ¹⁶	13.0%	6,837
Number of people with a close relationship with someone who gambled ¹⁷	10.0%	11,657
Number of people indirectly affected by a person experiencing harm ¹⁸	5.0%	4,961
Number of people harmed by gambling for each EGM ¹⁹	8.0%	16
Projected – Applicant's assumptions		
Combined EGM expenditure of moderate risk and problem gamblers (likely range for moderate risk and problem gamblers together is 42 per cent to 75 per cent with an average of 58.5 per cent) - High ²⁰	58.5%	\$790,589
Combined EGM expenditure of moderate risk and problem gamblers (likely range for moderate risk and problem gamblers together is 42 per cent to 75 per cent with an average of 58.5 per cent) - Medium ²¹	58.5%	\$718,718

¹² Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne

¹³ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne

¹⁴ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne

¹⁵ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne

¹⁶ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne

¹⁷ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne

¹⁸ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne

¹⁹ Storer, J., Abbot, M and Stubbs, J (2009) 'Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australian and New Zealand with respect to concentration of electronic gaming machines' *International Gambling Studies* Volume. 9, No. 3, December 2009, p238

²⁰ Productivity Commission 2010, *Gambling*, Report no. 50, Canberra

²¹ Productivity Commission 2010, *Gambling*, Report no. 50, Canberra

Indicator	Assumption	Indicative Cardinia Shire impact
Combined EGM expenditure of moderate risk and problem gamblers (likely range for moderate risk and problem gamblers together is 42 per cent to 75 per cent with an average of 58.5 per cent) - Low ²²	58.5%	\$646,846
Projected – VGCCC’s assumptions		
Combined EGM expenditure of moderate risk and problem gamblers (likely range for moderate risk and problem gamblers together is 42 per cent to 75 per cent with an average of 58.5 per cent) - High ²³	58.5%	\$1,590,509
Combined EGM expenditure of moderate risk and problem gamblers (likely range for moderate risk and problem gamblers together is 42 per cent to 75 per cent with an average of 58.5 per cent) - Medium ²⁴	58.5%	\$795,254
Combined EGM expenditure of moderate risk and problem gamblers (likely range for moderate risk and problem gamblers together is 42 per cent to 75 per cent with an average of 58.5 per cent) - Low ²⁵	58.5%	N/A

Source: SymPlan extrapolations based on evidence in Appendix 3

5.3 Protective and risk factors

78. The proposal is associated with the following protective and risk factors which influence the extent to which it will cause or exacerbate gambling harm in the community (refer to Table 11).

Table 11 – Protective and risk factors

Protective factor	Risk factor
Proposal	
The proposal involves a ‘top up’ as opposed to a new gaming venue.	<p>More than half (55 per cent) of the projected additional player loss associated with the proposal will be new player loss. A large proportion of this is likely to come from communities at an elevated risk of gambling harm.</p> <p>The proposal will increase exposure to gambling in the community as it:</p> <ul style="list-style-type: none"> • Involves an increase in the number of EGMs, both at the venue and in the municipality. • Enlarges the size of the venue allocated to gambling activities.
Socio-economic profile in the venue’s catchment	
Cardinia Shire and the proposal site’s primary catchment (2.5 kilometres) have mixed levels of socio-economic disadvantage.	The community in the venue’s catchment is growing and changing. Emerging communities are characterised by social and financial

²² Productivity Commission 2010, Gambling, Report no. 50, Canberra

²³ Productivity Commission 2010, Gambling, Report no. 50, Canberra

²⁴ Productivity Commission 2010, Gambling, Report no. 50, Canberra

²⁵ Productivity Commission 2010, Gambling, Report no. 50, Canberra

Protective factor	Risk factor
<p>Cardinia Shire displays few socio-economic indicators of vulnerability to gambling harms relative to the South Eastern Metropolitan Region.</p> <p>Cardinia Shire and the proposal site's 2.5 kilometre primary catchment have a lower rate of homelessness compared to metropolitan municipalities and Victoria.</p>	<p>vulnerability due to developing social connections and some housing stress.</p> <p>There are concentrations of socio-economic disadvantage in the proposal site's primary (2.5 kilometre) and secondary (5 kilometre) catchments.</p> <p>The Pakenham Precinct which accounts for 40 per cent of the gaming area's patrons, displays the greatest numbers of indicators of vulnerability to gambling harms relative to Cardinia Shire.</p>
Physical location	
<p>The proposal site is not within 400m of day to day activities such as public transport, shopping complex, strip shopping centre and would therefore not be considered a convenience gaming venue.</p> <p>The proposal site is not located in a strip shopping centre or shopping complex.</p>	<p>There are no non-gambling social, leisure, entertainment and recreation facilities and activities that operate at the same time as the gaming area in the surrounding area, particularly for young families.</p> <p>The site adjoins an intersection of major roads which increases exposure of gambling activities to people passing the venue.</p>
Venue type and size	
<p>Club Officer is a club. The Commission and Tribunal have in the past considered some club venues less risky than some hotels.</p>	<p>The proposal would increase the size of a venue already considered large.</p>
Venue operations	
<p>The venue provides some non-gambling entertainment activities.</p> <p>The reception operates during gaming area operating hours.</p> <p>The Onyx Gaming Compliance Report found that the proposed operator is committed to a best practice approach to responsible gambling, harm minimisation and customer care.</p> <p>The Harm Minimisation and Code of Conduct Policies and Procedures, Club Officer 2026 prohibits staff from using EGMs at any venue.</p> <p>Food and beverages will be available outside the gaming area during the opening hours of the food and beverage facilities.</p>	<p>The proposal does not align with the Productivity Commission's recommended shut down period of a minimum of six hours throughout the week or recommended closing time of 2am on Thursday, Friday and Saturday nights.</p> <p>The venue's loyalty program allows for points accrued from the use of the EGMs.</p> <p>Members receive marketing material relating to EGMs.</p> <p>The Harm Minimisation and Code of Conduct Policies and Procedures, Club Officer 2026 does not maximise opportunities for breaks in play for the following reasons:</p> <ul style="list-style-type: none"> • It does not prohibit the consumption of food or beverages at the EGM. • It does not prohibit the reservation of EGMs or use of multiple EGMs simultaneously. <p>No funds were allocated to the provision of responsible service of gambling measures or</p>

Protective factor	Risk factor
	services supporting people affected by gambling harm.
Venue design	
<p>Gaming patrons can pass through non-gambling facilities to access the gaming area.</p> <p>The dedicated outdoor smoking area off the gaming area may encourage breaks of play.</p> <p>The bistro is functionally and physically separated from the gaming area.</p> <p>The children's play area is visually and functionally separated from the gaming area.</p>	<p>The proposed venue design has the potential to increase exposure to gambling for non-gambling patrons due to the following design features:</p> <ul style="list-style-type: none"> • An additional internal entrance to the gaming area (there is currently only one). Multiple entrances increase the possibility to the escape of sights and sounds from the gaming area to non-gambling patrons. • An increase in the size of the venue allocated to gambling activities. • There is no indication in the application that the two entrances to the gaming area will have self-closing doors and/or will be screened. Inadequate screening raises increases the exposure of gambling activities to non-gambling patrons, including children and people vulnerable to gambling harm. • The internal entrance to the proposed function room is off the gambling area which means some non-gambling patrons using the function room will pass through gambling activities to access other facilities in the venue. • The eastern entrance to the venue (near the proposed function room) may permit patrons to enter and exit the gaming area unsupervised by the reception staff and would require them to pass through gambling activities to enter the gaming area.
Municipal gaming indicators	
Cardinia Shire's gaming indicators for the 2024-25 Financial Year relative to the metropolitan municipalities are favourable.	<p>There has been a significant growth in total EGM loss and EGM loss per adult over the past four financial years in the municipality.</p> <p>The municipality had the second highest real EGM loss in the 2024-25 Financial Year.²⁶</p>
Venue EGM loss	
Not applicable.	In the 2024-25 Financial Year player loss per EGM at the venue was the highest in the municipality indicating the EGMs are used intensely at the venue.

²⁶ VGCCC E&S Report April 2026

Club Officer Proposed Increase in Electronic Gaming Machines
Social and Economic Impact Assessment

Protective factor	Risk factor
	Over the last three years the venue experienced the largest per cent increase in EGM player loss per attached EGM (other than the Pink Hill Hotel which commenced operating in this time period).

5.4 Potential social impacts

Table 12 – Potential social impacts

Social impact consideration and discussion	Potential impact	Weighting
Community contribution		
<p>79. Community contributions have the potential to support social vitality and social cohesion in the community served by the recipient organisations.</p> <p>80. The Urbis SEIA (page 36) states the “...there is no specific commitment to increase the contributions based directly on the outcome of this application.” The proposal therefore does not secure an increase in the value of the community contributions the venue has made over the past two years.</p> <p>81. The value of the community contributions in the 2024-25 Financial Year was lower than the value of the community contributions for the 2023-24 Financial Year. The applicant does not provide the value of community contributions in the years previous to the two last years. It is therefore possible that the value of the proposed community contributions is lower than the community contributions made in the years between 2016 when the venue commenced operations and the 2022-23 Financial Year.</p> <p>82. Analysis of the venue’s community benefits for the 2018-19, and 2022-23 to 2024-25 Financial Years (refer to Section 2.6) identifies a very limited community benefit associated with the venue’s operations as identified by the following factors:</p> <ul style="list-style-type: none"> • The vast majority of claims are attributed to the venue’s operating expenses. • There has been an increase in the proportion of claims attributed to venue operating expenses and a reduction in the proportion of claims attributed to donations, gifts and sponsorships over this time. <p>83. There is no information in relation to the following:</p> <ul style="list-style-type: none"> • The nature or value of the in-kind contributions. • The proportion of the existing and/or proposed community contributions associated with cash or in-kind contributions. • Whether the recipient community organisations would be located in Cardinia Shire. 	Positive	Negligible

Social impact consideration and discussion	Potential impact	Weighting
<ul style="list-style-type: none"> Specific or direct support from organisations currently receiving, or potentially receiving, the cash and in-kind community contributions. Some organisations and agencies do not accept funds generated from gambling activities. The governance arrangements supporting the distribution of these contributions. <p>84. The Urbis SEIA (page 12) indicates the proposal involves maintaining 'this level of support' [around \$210,000 to \$260,000]. It is assumed these values are inclusive of both cash and in-kind contributions. This is confirmed on page 36 of the Urbis SEIA which indicates 'there is no specific commitment to increase contributions based directly on the outcome of this application.' This indicates that proposed community contribution arrangements would:</p> <ul style="list-style-type: none"> Only result in a condition securing the level of community contributions which have been made over the past two years rather than an increase in community contributions as a result of the additional twenty EGMs. Potentially result in a net reduction in the total value of the community contributions and the value of the cash contributions allocated since the venue commenced operations in 2016. Potentially support organisations not located within Cardinia Shire. 		
Increased access to and quality of non-gambling social, leisure, entertainment and recreation facilities		
<p>85. The proposal would result in a new function facility.</p> <p>86. The other works relate solely to refurbishments and an increase in the gaming floor area.</p> <p>87. The new function centre and enlargement of the gaming area are contingent on the approval of the amended gaming licence.</p> <p>88. There are two existing cafés/informal lounge areas adjoining the gaming area.</p> <p>89. The Cardinia Club, which is operated by the applicant, provides a function facility just beyond the venue's secondary catchment.</p> <p>90. There are several Council owned and managed function facilities in/just beyond the proposal site's secondary catchment that provide function rooms available for events. This point was noted by the [then] VGCLR in its decision to refuse the application for an additional 20 EGMs in 2017.</p>	Positive	Negligible

Social impact consideration and discussion		Potential impact	Weighting
91. The proposal would not result in a significant increase in access to and quality of non-gambling social, leisure, entertainment and recreation facilities.			
Access to EGMs for people not directly or indirectly affected by gambling harm			
92. Consumer surplus in the gambling context refers to the entertainment value derived from people using EGMs from losses. Consumer surplus associated with player loss for people not directly affected by gambling harm is a social benefit.		Positive	Negligible
93. The social benefit derived from the consumer benefit resulting from the increased access to EGMs for those not affected by gambling harm is limited as there are currently six gaming venues in Cardinia Shire, two others (excluding the venue) located within the proposal site’s secondary catchment.			
Access to EGMs for those directly or indirectly affected by gambling harms			
94. The proposal has the potential to cause and exacerbate gambling harm due to the following risk factors (refer to Sections 5.2 and 5.3 for greater details): <ul style="list-style-type: none">Increased access to opportunities to use EGMs and increased EGM player loss are recognised by the Commission as determinants of gambling harm.In its decision to refuse the application to increase the number of EGMs in 2017, the Commission noted the following factors which are still relevant in the application under consideration (refer to Section 2.1):<ul style="list-style-type: none">The community in the secondary catchment is socio-economically disadvantaged. Communities experiencing socio-economic disadvantage are at an elevated risk of gambling harm.The venue is in a growth area and therefore the exact risk profile of future patrons is unclear.The gaming area is ‘middle to upper middle, verging on a large venue’.Expenditure resulting from the additional EGMs would come from new expenditure.There is limited access to engage in non-gambling activities in the surrounding area.The existing EGMs at the venue have historically and are currently being used very intensely.		Negative	Moderate

Social impact consideration and discussion	Potential impact	Weighting
<ul style="list-style-type: none"> The venue's design and layout, and location of internal and external entrances increase exposure to gambling activities for both gambling and non-gambling patrons. The venue's operating hours do not align with best practice. 		

5.5 Potential economic impacts

Table 13 – Potential economic impacts

Economic impact consideration and discussion	Potential impact	Weighting
Community contributions		
95. In principle, community contributions have the potential to support the financial viability of the recipient organisations.	Positive	Negligible
96. The factors discussed under the social benefits of the community contributions limit potential economic benefit of the community contributions. Further, there is no certainty the cash contributions would support welfare and support agencies addressing gambling harm in the community in the future.		
Capital investment		
97. The proposal involves a capital expenditure of \$6.1 million.	Positive	Negligible
98. There is no indication in the application documentation that the capital investment will be of benefit to Cardinia Shire’s economy.		
99. The value of the capital expenditure is marginal in the context of Cardinia Shire’s economy.		
Employment generation		
100. The proposal will result in an increase of 32 short term jobs and 5.5 FTE employees across the venue, of which 1.9 FTE would be associated with the increase in the number of EGMs.	Positive	Negligible
101. Net municipal employment benefits are uncertain due to the potential transfer of jobs from other sectors and gaming venues in the catchment.		

Economic impact consideration and discussion	Potential impact	Weighting
102. There is no information regarding the proponent's strategy to fill the additional jobs by residents of Cardinia Shire. There is therefore a lack of certainty that these jobs would be filled by local residents.		
Economic stimulus		
<p>103. The proposal would result in approximately \$1,271,000 in supply contracts and internal complementary expenditure.</p> <p>104. Internal complementary expenditure is a potential economic benefit to the operator.</p> <p>105. There is insufficient information on the following:</p> <ul style="list-style-type: none"> • The value of external complementary expenditure. • The potential net economic benefit to the economy in Cardinia Shire associated with the supply contracts and internal complementary expenditure. • The source of transferred expenditure or the potential economic benefit arising from a reduction in leakage from the Cardinia Shire economy. <p>106. The impact of internal complementary expenditure on the local economy is discussed further under competition below.</p>	Positive	Negligible
Competition		
<p>107. Enhanced competitiveness is one of the objectives of the <i>Gambling Regulation Act 2003</i>.</p> <p>108. The increased revenue associated with the additional EGMs would result in improved competitiveness for the proponent.</p> <p>109. The proposal has the potential to enhance the competitiveness of the two other venues in the catchment.</p> <p>110. Any enhanced competitiveness would be distributed between the two gaming venues in the proposal site's secondary catchments.</p>	Positive	Negligible
<p>111. The proposal has the potential to divert gaming and complementary expenditure away from the two other venues in the catchment.</p> <p>112. In its decision to refuse the application for an additional 20 EGMs at the venue in 2017 the Commission noted that the applicant's share of EGM entitlements in the municipality is large (para 84). The proposal would result in an increase in the applicant's already large share of EGMs in the municipality (from 165 or 41 per cent to 185 or 44 per cent).</p>	Negative	Negligible

Economic impact consideration and discussion		Potential impact	Weighting
Tourism			
113. Promotion of tourism is one of the objectives of the <i>Gambling Regulation Act 2003</i> .		Neutral	
114. The proposal does not involve the provision of any tourist or cultural activities.			
Player loss from those not directly or indirectly affected by gambling harm			
115. In Victoria the theoretical return to player must not be less than 85 per cent. This is a long-term average, calculated over millions of spins.		Positive	Negligible
116. Over time patrons not affected by gambling harm may derive a financial benefit. However, a notable proportion of people using EGMs is likely to lose more than they win in the short and medium term.			
Player loss from those directly and indirectly affected by gambling harm			
117. More than half of the player loss associated with the additional EGMS will be new player loss.		Negative	Moderate
118. Any net increase in player loss is associated with gambling harm. As discussed under ‘Player loss from those not directly or indirectly affected by gambling harm’, it is more likely a gaming patron will lose more than they win.			
119. The negative impacts of gambling harm are exacerbated in communities vulnerable to the impacts of gambling harm. The community in the proposal site’s catchment is considered at an elevated risk of gambling harm.			
120. The extent of player loss per attached EGM at the venue is indicative of gambling harm among its patrons.			
121. The potential increase in gambling harm resulting from the proposal has the potential to increase the demand for health, welfare and support services in Cardinia Shire. This is associated with a potential cost to be borne by service providers. The economic impact of the additional costs borne by services providers addressing gambling harm would be negative.			

5.6 Alignment with Council's strategic framework

5.6.1 Cardinia Shire Liveability Plan 2017-2029

122. Given the multiple risk factors associated with the proposal, it does not align with Outcome 7 of which is a reduction in harm from gambling or the objective to decrease exposure to gambling

5.6.2 Cardinia Shire Gambling Harm Prevention and Minimisation Policy 2024

123. Action 1.2 in this Policy is to oppose applications for new EGMs if the proposal has the potential to elevate the risk of gambling harm within vulnerable communities (Planning and Regulation Pillar).

124. The discussion under Sections 5.3, 5.4 and 5.5 indicate the proposal has the potential to elevate the risk of gambling harm within vulnerable communities.

5.6.3 Clause 52.28 Gaming, Cardinia Planning Scheme

125. The extent to which the proposal aligns with the provisions in the schedule to Clause 52.28 Gaming in the Cardinia Planning Scheme is discussed in Table 14. The assessment is based on the risk and protective factors, and potential social and economic impact assessment in Sections 5.3, 5.4 and 5.5.

126. Where relevant, separate provisions with the same intention have been assessed together.

Table 14 – Alignment with Cardinia Planning Scheme

Provision	Alignment
Clause 1 Objectives	
To discourage new gaming machines in vulnerable or disadvantaged areas.	Does not align
To achieve positive social, economic and environmental outcomes in the location and relocation of gaming machines and avoid exacerbating the risk of problem gambling.	Does not align
To minimise opportunities for convenience gaming.	Aligns
To locate gaming machines where the community has a choice of non-gambling entertainment or recreation activities within the gaming venue and the local area.	Does not align
To protect the amenity of areas surrounding gaming venues.	Aligns
To avoid the establishment of gaming machines in the growth area ahead of sufficient population growth	Partially aligns
To protect the rural townships in the municipality from the negative impacts of gaming.	Not applicable
Clauses 2 and 3 – Prohibition in strip shopping centres and shopping complexes	
EGMs prohibited in strip shopping centres and shopping complexes.	Aligns
Clause 4 Locations for gaming machines	
Community has a choice of non-gaming entertainment and recreation activities and established social infrastructure, some of which operate during the times that the proposed gaming machines will operate in the local area.	Does not align
Make a positive contribution to the redistribution of gaming machines away from relatively disadvantaged areas.	Does not align

Provision	Alignment
Facility is removed from day-to-day convenience activities.	Aligns
In growth areas, where the Electronic Gaming Machine (EGM) density cap does not exceed 10 EGMs per 1,000 persons over the age of 18 as set by the State Government.	Aligns
More than 400 meters walking distance of a concentration of social housing.	Aligns
More than 400 metres walking distance from the 20 per cent most disadvantaged statistical areas in Cardinia Shire.	Aligns
At the periphery of activity centres removed from land zoned for a commercial purpose or at a sports or recreation club.	Aligns
5 Venues for gaming machines	
That offer and promote a range of other forms of recreation and entertainment other than gambling based activities and which are located in spaces completely divorced from the presence of EGMs.	Partially aligns
That promote non-gaming activities that increase the choice of activities and attractions available to patrons.	Aligns
That limit play by condition of approval to times when alternative entertainment and recreation is also operating and available.	Does not align
That already have gaming machines (in preference to the establishment of a new gaming.	Aligns
That are designed to comply with best practice and the full ambit of the VCGLR Venue Manual or any regulatory successor.	Partially aligns
Promote responsible gaming practices.	Partially aligns
Allow for a substantive period of time whereby gaming machines are non-operational.	Does not align
7 Decision guidelines	
The relative vulnerability to problem gaming within a 5 kilometre radius of the proposed venue, or alternative catchment area where appropriate.	Does not align
Net community benefit derived from the application, aside from any community contribution scheme.	Does not align
Whether approval is likely to increase the social disadvantage or vulnerability of the local community.	Does not align
Whether the location of the gaming machines or gaming premises will facilitate or discourage convenience gaming.	Aligns
Whether the venue is accessible by a variety of transport modes.	Aligns
Whether residents will have a choice between entertainment and recreation venues with and without gambling in the local area.	Does not align
The impact of the proposal on the amenity of the area and surrounding land uses.	Aligns

127. Summary:

- The proposal aligns with provisions seeking to avoid the establishment of a new gaming venue, prevent convenience gambling and protect the amenity of the area and surrounding land uses.
- Although the proposal site is not within 400 metres walking distance of concentrations of socio-economic disadvantage and social housing, its catchment incorporates communities at an elevated risk of gambling harm. On balance, the proposal does not align with provisions seeking to protect vulnerable communities from gambling harm.
- The proposal does not align with provisions seeking to maximise access to non-gambling social, leisure, entertainment and recreation facilities and activities or achieve a net community benefit.
- The design and some of the venue's operations do not align with provisions seeking to achieve best practice.

6 Summary, conclusion and recommendations

6.1 Summary

6.1.1 Impact on community wellbeing

128. The proposal is associated with the following **protective factors**:

- The community in Cardinia Shire as a whole would not be considered vulnerable to gambling harm.
- The physical location of the proposal site limits the potential for convenience gambling.
- The gaming area is visually separated from the bistro, children's play area.
- Certain aspects of the venue's operations reduce the risk of gambling-harm.

129. The proposal is associated with the following **risk factors** for gambling harm and compromised community wellbeing:

- The venue is a medium to large which would become even larger.
- Player loss and player loss per EGM at Club Officer is significantly higher compared to the other venues in Cardinia Shire, and clubs in metropolitan municipalities and Victoria.
- Pockets of socio-economic vulnerability to gambling harm of the community in the proposal site's catchment increases the potential for the proposal to compromise the health and wellbeing of the community.
- The venue's trading hours do not align with the Productivity Commission's recommendations.
- The design of the gaming area and potential for the function room to be functionally integrated with the gambling facilities have the potential to increase exposure to gambling activities and minimise the opportunity for staff to monitor people affected by gambling harm.

130. The main **social benefit** is the inclusion of a function area.

131. Due to the multiple socio-economic and venue-related risk factors, the proposal has the potential to result in gambling-harm within a community already considered to be vulnerable to gambling harm.

132. Overall, the proposal has the potential to increase gambling harms and compromise the wellbeing of the community in the proposal site's catchment which is at an elevated risk of gambling harm.

6.1.2 Alignment with Cardinia Shire's strategic framework

133. The proposal does not align with the provisions in Cardinia's strategic framework that seek to protect the community from gambling harm.

6.2 Conclusion

134. In conclusion:

- The proposal has the potential to increase gambling harm and compromise the wellbeing of the community in the proposal site's catchment.
- The proposal is associated with multiple risk factors that reduce the potential for the protective factors to adequately mitigate against the potential increase in gambling harms.
- The proposal is associated with minimal benefits.

6.3 Recommended mitigation measures

135. Should the Commission be of mind to approve the proposal to increase the number of EGMs by 20 from 60 to 80 at the proposal site, it is recommended the following mitigation measures be included by way of condition of approval:

6.3.1 Venue design

1. Amend the layout to reduce exposure to gambling for gambling and non-gambling patrons by:
 - a. Redesigning the entrance to the gaming area to allow for a single entrance.
 - b. Ensuring the rear entrance to the function room off the eastern car park is only operational during times when the function room is being used.
 - c. Repositioning the reception centre to ensure patrons using the function room are monitored and required to sign into the venue before using the gaming area.
 - d. Fitting the remaining single entrance to the gaming area with a floor to ceiling self-closing door constructed from wood or opaque glass.
 - e. Installing a screen behind the self-closing door at the remaining single entrance to reduce sights and sounds into the gaming area when the door is open.
 - f. Ensure there are no views into the gaming area from the external areas.
2. Design the layout of EGMs in the gaming area to ensure direct lines of sight from the cashier's desk to each EGM.

6.3.2 Venue operations

3. Ensure the reception centre is operational during the gaming room operating hours.
4. Reduce the operating hours in order that the gaming area closes at 2am seven days a week.
5. Provide food and beverages at all times in other parts of the venue while the gaming area is operating.
6. Prohibit the consumption of food and beverages to patrons while seated at an EGM.
7. Prohibit the reservation of EGMs.

6.3.3 Community contributions

8. Ensure the value of the cash community contributions per additional EGM are in line with industry practices.
9. All cash contributions are to be allocated to organisations located in Cardinia Shire.
10. Ensure the proposed cash contributions are allocated in consultation with key stakeholders (including Council if appropriate) and service providers. These cash contributions should be allocated in accordance with the priorities identified in the *Cardinia Liveability Plan 2017-2029* and *Cardinia Shire Council Plan 2025-2029*.
11. Ensure the governance arrangements associated with the allocation of the proposed cash community contributions and the nature of the in-kind contributions are transparent and equitable.

Appendix 1– Bibliography

Alliance For Gambling Reform – Position Paper *A Mandatory Registered Cashless Gambling Card System to Address gambling harm and criminal gaming activity* January 2023

Andrew Harris & Mark D. Griffiths, (2017), A Critical Review of the Harm-Minimisation Tools Available for Electronic Gambling, *Journal of Gambling Studies*, March Vol.33 Issue 1 pp.187-221

Australian Government Productivity Commission (2010) *Productivity Community Inquiry Report, Gambling*

Australian Institute of Health and Welfare 2021 *Gambling in Australia*

Beresford, K., & Blaszczynski, A. (2020). *Return-to-Player Percentage in Gaming Machines: Impact of Informative Materials on Player Understanding*. *Journal of Gambling Studies*, 36, 825–843. <https://doi.org/10.1007/s10899-019-09854-z>

Blaszczynski, A et al (2001) *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

Brett Hetherington and Tony Phillips (2023), *Discussion paper: Gambling harm and the online gambling environment*, Victorian Responsible Gambling Foundation, Melbourne

Browne M, Tulloch C, Rawat V, Dellosa G, Russell AMT, Hing N, Rockloff M and Doran C (2025) *The social costs of gambling to Victoria, 2023*, State Government of Victoria, Melbourne

Browne, B. Delfabbro. P; Thorne. H.; Tulloch, C; Rockloff, M; Hing, N; Dowling, N; and Stevens M (2023) “Unambiguous evidence that over half of gambling problems in Australia are caused by electronic gambling machines. Results from a Large-scale composite population study” *Journal of Behavioral Addictions* 2 (2023) 1, 182–193 DOI: 10.1556/2006.2022.00083

Browne, M, Greer, N, Armstrong, T, Doran, C, Kinchin, I, Langham, E & Rockloff, M (2017), *The social cost of gambling to Victoria*, Victorian Responsible Gambling Foundation, Melbourne.

Equity Economics (2025), *Gambling in Australia’s cost-of living crisis. The Black Hole in Household Budgets* <https://www.equityeconomics.com.au/report-archive/gambling-in-australias-cost-of-living-crisis-the-black-hole-in-household-budgets>

Hing, N et al (2022) *NSW Youth Gambling Study 2022: Qualitative Research* NSW Government

Hing, N. and Haw, J (2010) *The Influence of Venue Characteristics on a Player’s Decision to Attend a Gambling Venue* Centre for Gambling Education and Research

Hing, N., O’Mullan, C., Mainey, L. et al. “Intimate partner violence linked to gambling: cohort and period effects on the past experiences of older women”. *BMC Women's Health* **23**, 165 (2023).

Hing, N., O’Mullan, C., Nuske, E., Breen, H., Mainey, L., Taylor, A., Rawat, V. (2020). *The relationship between gambling and intimate partner violence against women* (Research report, 21/2020). Sydney: ANROWS.

Johnson, R. H., Pitt, H., Randle, M., & Thomas, S. (2023). *A scoping review of the individual, socio-cultural, environmental and commercial determinants of gambling for older adults: implications for public health research and harm prevention*. *BMC Public Health*, 23, 362.

Kinetica and K2 Planning (2021) *Building Resilience in New and Emerging Communities* Northern Metropolitan Partnership Group

Leino, T. et al (2017) ‘Gambling behavior in alcohol-serving and non-alcohol-serving-venues: a study of electronic gaming machine players using account records’ *Addiction Research & Theory* 25.:3, 201-297

Markham, F, Doran, B & Young, M (2016), 'The relationship between electronic gaming machine accessibility and police-recorded domestic violence: a spatio-temporal analysis of 654 postcodes in Victoria, Australia, 2005–2014', *Social Science & Medicine*, vol. 162, pp. 106–14.

Marko, S. et al. (2023). The lived experience of financial harm from gambling in Australia. *Health Promotion International*.

McCarthy S, Thomas SL, Pitt H, Bellringer ME. (2021) "You don't really see the dangers of it at the time." Risk perceptions and behaviours of older female gamblers. *Soc Sci Med*. 2021

McCarthy, S, Thomas, S, Bellringer, M and Cassidy, R (2019) *Harm Reduction Journal* Women and gambling-related harm: a narrative literature review and implications for research, policy, and practice 16.18

Palmer du Preez et al. (2021) 'Theoretically informed gender analysis for gambling harm reduction: a New Zealand study' *Harm Reduction Journal* 18:111

Pickernell, D. et al (2013) 'Taking the Gamble: Local and Regional Policy Issues of access to Electronic Gaming Machines (EGMs): A Case Study in Victoria, Australia.' *Australasian Journal of Regional Studies*

Productivity Commission Inquiry Report into Gambling (2010), Australian Government

Public Accounts and Estimates Committee (2023) Gambling and liquor regulation in Victoria: a follow up of three Auditory-General reports Parliament of Victoria

Raybould, J.N., Larkin, M. & Tunney, R.J. Is there a health inequality in gambling related harms? A systematic review. *BMC Public Health* **21**, 305 (2021).

Rockloff, M (2010) *The impact of an audience and venue size on poker machine gambling* Central Queensland University Institute of Health and Social Science Research

Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K (2020) *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne.

Roger Wilkins, Ferdi Botha, Inga Laß and Kyle Peyton (2024) *The Household, Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 22*. Melbourne Institute of Applied Economic and Social Research, The University of Melbourne.

Storer, J, Abbot, M and Stubbs, J (2009) 'Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australian and New Zealand with respect to concentration of electronic gaming machines' *International Gambling Studies* Volume. 9, No. 3, December 2009, p238

Suicide Prevention Australia (2022) Inquiry into online gambling and its impacts on those experiencing gambling harm, Submission 41

Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State of Victoria, Melbourne.

Thomas, S et al (2023) *Health Promotion International* 'Protecting children and young people from contemporary marketing for gambling' Volume 38 pp1-14

Thomas, S, Pitt, H, Randle, M, McCarthy, S, Daube, M, Bestman, A & de Moel, C (2020), Australian young women's gambling behaviours: A socio-cultural investigation of gambling attitudes, beliefs, and consumption intentions, Victorian Responsible Gambling Foundation, Melbourne.

Thomas, S.L., Crawford, G., Daube, M., Pitt, H., Hallett, J., McCarthy, S., Francis, L. and Edmunds, M. (2023), Time for policies on gambling to benefit health - not the gambling industry. *Health Promot J Austral*, 34: 267-271.

Tirachaimongkol, L. , Jackson, A. and Tomnay, J. (2010) 'Pathways to Problem Gambling in Seniors', *Journal of Gerontological Social Work*, 53: 6, 531 — 546

Victorian Competition and Efficiency Commission (2012). *Counting the Cost: Inquiry into the Costs of Problem Gambling*.

VicHealth Coronavirus Victorian Wellbeing Impact Study: Follow-up survey (2020), Victorian Health Promotion Foundation, Melbourne <https://doi.org/10.37309/2020.PO1011>

Victorian Responsible Gambling Foundation (2015) *Background Paper – Risk factors for problem gambling: environmental, geographic, social, cultural, demographic, socio-economic, family and household*

Victorian Responsible Gambling Foundation (2013) *The Responsible Gambling Guide*

Appendix 2 – Social impact assessment framework

Social impacts

Social impacts have been defined as ‘the consequences to human populations of any public or private actions that alter the ways in which people live, work, play, relate to one another, organise to meet their needs and generally cope as members of society. The term also includes cultural impacts involving changes to the norms, values and beliefs that guide and rationalize their cognition of themselves and their society’.²⁷

In the context of applications for EGMs and gaming venues, social impacts include changes to the following:²⁸

- *People’s way of life* – how they live, work, play and interact with one another on a day to day basis.
- *Their culture* – their shared beliefs, customs and values in relation to gambling and EGMs.
- *Their community* – its cohesion, stability, character, services and facilities.
- *Their health and wellbeing* – the impact of gambling harm on mental and physical health and wellbeing; health has been defined as a state of complete physical, mental, social and spiritual wellbeing and not merely the absence of disease or infirmity.²⁹
- *Their personal and property rights* – particularly whether people are economically affected, or experience personal disadvantage.
- *Their fears and aspirations* – their perceptions about their safety, their fears about the future of their community, and their aspirations for their future and the future of their children.

Social impact assessment

Social impact assessment has been defined as follows:³⁰

The processes of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions (policies, programs, plans, projects) and any social change processes invoked by those interventions. Its primary purpose is to bring about a more sustainable and equitable biophysical and human environment.

The core international values of impact assessment include:³¹

- People have a right to live and work in an environment which is conducive to good health and to a good quality of life and which enables the development of human and social potential.
- Social dimensions of the environment are important aspects of people’s health and quality of life.
- People have a right to be involved in decision-making about the planned interventions that will affect their lives.

²⁷ The Interorganizational committee on Principles and Guidelines for Social Impact Assessment (2003) *US Principles and guidelines*. “Principles and guidelines for social impact assessment in the USA” *Impact Assessment and Project Appraisal*, Volume 21, Number 3, September 2003, p231Beech Tree Publishing, Surrey, UK

²⁸ Planning Institute of Australia *Social Impact Assessment Policy Position Statement 2006*, International Association for Impact Assessment (2003) *Social Impact Assessment. International Principles* Special Publication Series No.

²⁹ World Health Organisation

³⁰ IAIA (2003) *Social Impact Assessment International Principles* Special Publication Series No. 2

³¹ Vanclay, F. (2003) ‘International Principles for Social Impact Assessment’ *Impact Assessment and Project Appraisal Vol. 21*, number 1, March 2003, pp 5-11, Beech Tree Publishing, UK

- Mitigation measures can be implemented to minimise the harm and maximise the benefits from a specific planned intervention or related activity.

The following international guiding principles underpinning social impact assessment are relevant:³²

- The diversity of stakeholder interests needs to be recognised and valued.
- In order to protect the environment, a concept which includes people's ways of life and the integrity of their communities, the precautionary approach should be applied. Where there are threats or potential threats of serious social impact, lack of full certainty about those threats should not be used as a reason for approving the planned intervention or not requiring the implementation of mitigation measures and stringent monitoring.
- The benefits from a range of planned interventions should address the needs of all, and the social impacts should not fall disproportionately on certain groups of the population.
- It is generally preferable and cheaper in the long run to prevent negative social impacts from happening than having to rectify damage after the event.
- The discussion of the proposal includes a description of any policy or plan that is relevant.³³

An important feature of social impact assessment is that social, economic and biophysical impacts are inherently and inextricably interconnected. Social impact assessment must therefore develop an understanding of the impact pathways created when change in one domain triggers impacts across other domains and the iterative or flow-on consequences within each domain.³⁴

The Planning Institute of Australia's *Social Impact Assessments Policy Position Statement 2006* recommends the application of social impact assessment as a tool to support better development outcomes. This Statement also:

- highlights the critical contribution social impact assessment makes to sound decision-making processes and the achievement of equitable and sustainable development
- affirms the need to include consideration of community concerns and the participation of stakeholders in the process
- affirms the need for a description of the local cultural context
- recommends mitigation measures

³² Vanclay, F. (2003) 'International Principles for Social Impact Assessment' *Impact Assessment and Project Appraisal* Vol. 21, number 1, March 2003, pp 5-11, Beech Tree Publishing, UK

³³ The Interorganizational committee on Principles and Guidelines for Social Impact Assessment (2003) *US Principles and guidelines. "Principles and guidelines for social impact assessment in the USA"* *Impact Assessment and Project Appraisal*, Volume 21, Number 3, September 2003, p231Beech Tree Publishing, Surrey, UK p234

³⁴ International Association for Impact Assessment (2003) *Social Impact Assessment. International Principles* Special Publication Series No.

Appendix 3 - Theoretical framework

Gambling harm

Definition

Problem gambling has been defined as:

*Difficulties in limiting money and/or time spent on gambling, which leads to adverse consequences for the gambler, others, or for the community.*³⁵

Gambling harm has been defined as:

*Any initial or exacerbated adverse consequence due to an engagement with gambling that leads to a decrement to the health or wellbeing of an individual, family unit, community or population.*³⁶

Prevalence of gambling harm

Research has identified the following indicators of gambling harm in Victoria:³⁷

- 53 per cent of adults
- 11 per cent of adults gamble on EGMs
- Of those who gamble, 5.3 per cent fall into the low risk category, 2.3 per cent fall into the moderate risk category and 0.9 per cent are considered 'problem gamblers' who fall into the high risk category.
- 13 per cent of all gamblers experience some sort of harm
- 10 per cent of people have who had a close relationship with someone who gambled was personally affected by that person's gambling
- 5 per cent of people are personally affected by someone else's gambling

Determinants of vulnerability to gambling harm

Socio-economic	<ul style="list-style-type: none">• low educational attainment³⁸• people earning less than \$20,799 per annum³⁹• relative socio-economic disadvantage⁴⁰• unemployment⁴¹• residents of social housing⁴²
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³⁵ Victorian Auditor-General's Report (2010) 11:2 p3

³⁶ Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T 2016, Assessing gambling-related harm in Victoria: a public health perspective, Victorian Responsible Gambling Foundation, Melbourne.

³⁷ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State of Victoria, Melbourne.

³⁸ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

³⁹ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁴⁰ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁴¹ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁴² VCGLR decision on the proposed increase of EGMS at the Braybrook Hotel, September 2013.

Club Officer Proposed Increase in Electronic Gaming Machines
Social and Economic Impact Assessment

Socio-demographic	<ul style="list-style-type: none"> • males⁴³ • aged 18-24 years⁴⁴ • older adults⁴⁵ • older women⁴⁶ • not speaking English at home⁴⁷ • Aboriginal and Torres Strait Islanders⁴⁸ • migrants and people from CALD communities⁴⁹, particularly Asian groups⁵⁰ • living in a group household⁵¹
Health and wellbeing status	<ul style="list-style-type: none"> • Chronic health conditions⁵² • experiencing low social capital⁵³ (using volunteering rate as a proxy) • experiencing psychological distress or compromised mental health and wellbeing⁵⁴ • smoke^{55, 56, 57} risky levels of alcohol consumption⁵⁸ and become intoxicated while gambling;^{59; 60}

⁴³ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁴⁴ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁴⁵ Johnson, R. H., Pitt, H., Randle, M., & Thomas, S. (2023). A scoping review of the individual, socio-cultural, environmental and commercial determinants of gambling for older adults: implications for public health research and harm prevention. *BMC Public Health*, 23, 362.

⁴⁶ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁴⁷ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁴⁸ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁴⁹ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁵⁰ Rowlatt, V Wraith, D Doan, T and Matlatzky C (2023) "Culturally and Linguistically diverse Gamblers of East Asian Descent in Australia: A comprehensive Review of Current Evidence *Journal of Gambling Studies* 39:947-969

⁵¹ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁵² Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁵³ Awaworyi Churchill, S., & Farrell, L. (2020). *Social Capital and Gambling: Evidence from Australia*. *Journal of Gambling Studies*, 36, 1105–1127.

⁵⁴ Håkansson, Anders; Fernández-Aranda, Fernando; Menchón, Jose M.; Potenza, Marc N.; Jiménez-Murcia, Susana, Gambling During the COVID-19 Crisis – A Cause for Concern, *Journal of Addiction Medicine: July/August 2020 - Volume 14 - Issue 4 -*

⁵⁵ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne

⁵⁶ <http://www.tobaccoinaustralia.org.au/15-4-overview-of-key-public-areas-and-environments>

⁵⁷ Butler N, Quigg Z, Bates R, Sayle M, Ewart H. Gambling with Your Health: Associations Between Gambling Problem Severity and Health Risk Behaviours, Health and Wellbeing. *J Gambl Stud.* 2020 Jun;36(2):527-538. doi: 10.1007/s10899-019-09902-8. PMID: 31705379; PMCID: PMC7214382.

⁵⁸ Suomi, A., Kim, J., Biddle, N., Dowling, N. A., Hahn, M., Cowlshaw, S., Butterworth, P., Thomas, A., Hodgins, D., Heywood, W., Scott, P., Myers, P., 2024, *Victorian population gambling and health study 2023*, State Government of Victoria, Melbourne.

⁵⁹ Rockloff, M, Browne, M, Hing, N, Thorne, H, Russell, A, Greer, N, Tran, K, Brook, K & Sproston, K 2020, *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne

⁶⁰ Leino, T. et al (2017) 'Gambling behavior in alcohol-serving and non-alcohol-serving-venues: a study of electronic gaming machine players using account records' *Addiction Research & Theory* 25.:3, 201-297 https://www.academia.edu/32303619/Leino_T._Sagoe_D._Griffiths_M.D._Mentzoni_R.A._Pallesen_S._and_Molde_H._2017_.Gambling_behavior_in_alcohol-serving_and_non-alcohol-serving_venues_A_study_of_electronic_gaming_machine_players_using_account_records._Addiction_Research_and_Theory_25_201-207

Life experiences	<ul style="list-style-type: none"> people with higher number of negative life experiences affecting themselves and their families e.g. divorce, legal difficulties and financial issues;⁶¹ people experiencing trauma, social isolation,⁶² and loneliness⁶³
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Social and economic impacts of EGM gambling

Table 15 summarises the social and economic impacts (benefits and disbenefits) associated the use of EGMs.

Table 15 - Summary of social and economic impacts of EGM gambling

Social	Economic
Benefits⁶⁴	
Access to entertainment for those not affected by harm	Cash and in-kind community contribution (additional source of revenue for recipients)
Cash and in-kind community contribution (social capital)	Employment (temporary and permanent)
Increased access to social, leisure, entertainment and recreation facilities	Source of revenue for operators
Improved quality of social, leisure, entertainment and recreation facilities	Economic stimulus (investment, supply contracts and complementary expenditure)
	Competition (improved competition)
	Tourism
	EGM player loss for people not affected by gambling harms
Disbenefits⁶⁵	
Impact on people directly and indirectly affected by gambling harm such as relationship breakdown, mental and physical illness, crime, family violence, loss of employment	Competition (transfer of revenue from other gaming venues, food and beverages)
	Cost of service provision
	Financial hardship
	Unemployment

Social impact considerations

Community contribution

Applications for additional EGMs are often associated with cash and in-kind community contributions.

Cash community contributions typically involve a fund allocated annually to community organisations. Cash contributions support programs and activities delivered by these organisations. In-kind community contributions involve providing community organisations with free and ready access to non-gambling facilities such as meeting and function rooms, discounted food and beverages and, vouchers. Cash and in-kind community contributions can have a positive social impact on the participating community organisations if they support the provision of additional services and activities to people located in the municipality. The social benefits to beneficiaries of discounted food

⁶¹ VAGO (2010) *Taking Action on Problem Gambling*

⁶² Håkansson, Anders; Fernández-Aranda, Fernando; Menchón, Jose M.; Potenza, Marc N.; Jiménez-Murcia, Susana, Gambling During the COVID-19 Crisis – A Cause for Concern, *Journal of Addiction Medicine: July/August 2020* - Volume 14 - Issue 4 -

⁶³ Miller, H. (2015) *Background Paper. Risk Factors for Problem Gambling: Environmental, geographic, social, cultural, demographic, socio-economic, family and household*. Victorian Responsible Gambling Foundation

⁶⁴ Adapted from Productivity Commission (2010) and VCGLR application forms

⁶⁵ Adapted from VCEC Inquiry into Costs of Problem Gambling (2012), VCGLR forms and independent research

and beverages, facility hire and vouchers may lead to increased participation and engagement in social activities.

The Gaming Commission has found the benefits associated with community contributions are contingent on their outcomes rather than their magnitude.^{66, 67}

The extent of the social impact of cash and in-kind community contributions schemes is influenced by the following factors:

In some instances community organisations, health agencies and Councils are unwilling to participate in community contributions schemes associated with the operation of gaming venues.

The clubs and community organisations that will be the recipients of these community contributions may not necessarily be used by people experiencing gambling harms who tend to be socially isolated. The community organisations supported by the increased contributions are therefore unlikely to satisfy the social needs of people who are isolated and therefore at risk of and vulnerable to the impacts of gambling harms.

Access to social, leisure, entertainment and recreation facilities

EGMs provide a legal and legitimate form of entertainment in Victoria. Participation in this form of entertainment is a social benefit for people not affected by gambling harm.

Gaming venues typically provide non-gambling facilities such as meeting and function rooms, bistros, cafes, lounges, smoking areas, sports and recreation facilities, and gambling facilities such as gaming areas and sports lounges.

Health and wellbeing impacts of EGM player loss

EGM player loss not associated with gambling harm is a consumer surplus.

EGM player loss is one of the determinants of gambling harms. The Productivity Commission (2010 p5.1) estimated that 'problem gamblers'⁶⁸ account for between 22 per cent and 60 per cent (averaged at 41 per cent) of total EGM spending and the likely range for moderate risk and problem gamblers together is 42 to 75 per cent (average 58.5 per cent) of total EGM spending.⁶⁹ Other research estimates 36 per cent of player loss on EGM gambling is sourced from people classified as 'problem gamblers' with a further 23.6 per cent coming from people classified as 'moderate risk gamblers'.⁷⁰

The Commission has noted that wherever accessibility to EGMs is increased, there is always a risk of an increase in gambling harms which can lead to other costs such as lost productivity, increased health and social service requirements and other social costs.⁷¹ This is because EGMs are recognised as posing the greatest risks to existing and potential problem gamblers⁷² for the following reasons:

- Around 80 per cent of presentations to counselling agencies relate to problems associated with EGMs.⁷³
- For each additional EGM introduced into an area, there will be an increase of between 0.6 and 1 'problem gamblers', with an average of 0.8 problem gamblers per EGM.⁷⁴

⁶⁶ Commission Decision Berwick Springs Hotel 2017

⁶⁷ Commission Decision, Lynbrook Hotel, 2018

⁶⁸ As defined by the Problem Gambling Severity Index (PGSI)

⁶⁹ Productivity Commission (2010)

⁷⁰ Browne, M, Greer, N, Armstrong, T, Doran, C, Kinchin, I, Langham, E & Rockloff, M 2017, *The social cost of gambling to Victoria*, Victorian Responsible Gambling Foundation, Melbourne.

⁷¹ Commission Decision, Croydon Hotel, paragraph 90; Commission Decision, Dromana Hotel, paragraph 59, Commission Decision, Mornington on Tanti, paragraph 94, Commission Decision, Zagame's Berwick, paragraph 53

⁷² Australian Government Productivity Commission (2010) *Productivity Community Inquiry Report, Gambling* p5.22

⁷³ Australian Government Productivity Commission (2010) *Productivity Community Inquiry Report, Gambling* p5.26

⁷⁴ Storer, J, Abbot, M and Stubbs, J (2009) 'Access or adaptation? A meta-analysis of surveys of problem gambling prevalence in Australian and New Zealand with respect to concentration of electronic gaming machines' *International Gambling Studies* Volume. 9, No. 3, December 2009, p238

- Under the *Gambling Regulation Act 2003 (Vic)* and the *Gambling Regulation Regulations 2015 (Vic)*, EGMs must comply with technical standards approved by the regulator. The *Victorian Gaming Machine Technical Standards* specify that the theoretical return to player must not be less than 85 per cent. Return to player percentage is a theoretical calculation over the lifetime of an EGM and is unlikely to be achieved for a single player in a single session of EGM use.⁷⁵ The payout rate varies substantially due to chance, with no requirement for the EGM to return the expected rate within any given session of play⁷⁶. The average return to player within a session may depart from the theoretical figure by around 60–70 per cent, while the average return across multiple sessions may be as low as 40 per cent.⁷⁷ Some EGM users do not understand the concept and role played by the return to player percentages and some who understand it may choose to ignore it.⁷⁸

The Commission recognises the association between EGM player loss and family violence.⁷⁹ Gambling problems are clearly and strongly linked to being a perpetrator, victim or survivor of domestic and family violence.^{80, 81}

Each person with gambling problems has 5 to 10 people in their lives who are affected by their gambling.⁸²

Economic impact considerations

Community contribution

Cash and in-kind community contributions may supplement the income of the beneficiaries and support their financial viability.

The Victorian Competition and Efficiency Commission Inquiry into the costs of problem gambling (December 2012, p 1) found the costs of gambling harms are borne not by individual organisations and beneficiaries of community contributions but by the health and human services sectors within the broader community.

Employment generation

Proposals may be associated with an increase in temporary jobs during construction and permanent jobs during operation. They may also be associated with an increase in permanent jobs, both directly and indirectly associated with the operation of EGMs in the venue.

The economic benefit associated with employment to be generated by a proposal is influenced by the following factors:

- The Productivity Commission found the employment and economic benefits of gambling are less than they might appear to be.⁸³

⁷⁵ Beresford, K., & Blaszczyński, A. (2020). *Return-to-Player Percentage in Gaming Machines: Impact of Informative Materials on Player Understanding*. Journal of Gambling Studies, 36, 825–843.

⁷⁶ Beresford, K., & Blaszczyński, A. (2020). *Return-to-Player Percentage in Gaming Machines: Impact of Informative Materials on Player Understanding*. Journal of Gambling Studies, 36, 825–843.

⁷⁷ Beresford, K., & Blaszczyński, A. (2020). *Return-to-Player Percentage in Gaming Machines: Impact of Informative Materials on Player Understanding*. Journal of Gambling Studies, 36, 825–843.

⁷⁸ Beresford, K., & Blaszczyński, A. (2020). *Return-to-Player Percentage in Gaming Machines: Impact of Informative Materials on Player Understanding*. Journal of Gambling Studies, 36, 825–843.

⁷⁹ Commission decision, Altona RSL, 2018

⁸⁰ Hing, N., O'Mullan, C., Nuske, E., Breen, H., Mainey, L., Taylor, A., ... Rawat, V. (2020). *The relationship between gambling and intimate partner violence against women* (Research report, 21/2020).

⁸¹ Rockloff, M., Browne, M., Hing, N., Thorne, H., Russell, A., Greer, N., Tran, K., Brook, K & Sproston, K (2020), *Victorian population gambling and health study 2018–2019*, Victorian Responsible Gambling Foundation, Melbourne.

⁸² Victorian Responsible Gambling Foundation (2013) *The Responsible Gambling Guide*

⁸³ Gretton, P. (2013) *On input-output tables: uses and abuses*, Staff Research Note, Productivity Commission, Canberra.

- The Commission has found the transfer of EGM player loss from elsewhere in the municipality may also be associated with a transfer of employment.⁸⁴ As a result, the stated additional jobs at the proposal site may not necessarily be associated with a net increase of jobs in the municipality.
- There is no certainty regarding extent to which the additional jobs will be filled by members of the community in the municipality,⁸⁵ including those experiencing unemployment.

Economic stimulus

Economic stimulus can result from supply contracts and internal and external complementary expenditure.

The economic flow on effects associated with supply contracts, and internal and external complementary expenditure associated with goods and services is an economic benefit if they occur within the municipality.⁸⁶

The Tribunal found that the economic benefits of gaming player loss by non-problem gamblers are of less benefit to the community than other forms of discretionary expenditure and that expenditure multipliers applicable to player loss on EGMs are among the lowest of all industry sectors, in terms of flow on benefits to the regional economy. The Tribunal also accepted that player loss on EGMs is less of an economic benefit compared to expenditure on meals in a pub, restaurant or café.⁸⁷

EGM gambling inputs into the economy as a whole are largely, but not wholly, cancelled out by the multiplied negative effects on other areas of consumption.⁸⁸

Investment

Proposals for new gaming venues and top ups are typically associated with capital expenditures and investment. This is an economic benefit if the investment supports the local economy.

Competition

Enhanced competitiveness is one of the objectives of the *Gambling Regulation Act 2003*.

This increased competitiveness may encourage gaming operators in the primary and secondary catchments to enhance the quality of offer in other gaming venues.

Increased competition may compromise the financial viability of competing gaming venues as a result of the transfer of EGM and non-gambling expenditure.⁸⁹

Tourism

Promotion of tourism is one of the objectives of the *Gambling Regulation Act 2003*.

Tourism and related cultural activities may assist in creating economic growth, if aligned with gambling activities. There is a need to capitalise on synergies of clubs, tourism, cultural experiences and retail to improve, rather than diminish, local trade.⁹⁰

⁸⁴ Commission Decision Berwick Springs Hotel 2017

⁸⁵ Commission Decision Berwick Springs Hotel 2017

⁸⁶ Commission Decision Berwick Springs Hotel 2017, Commission Decision Robin Hood Hotel 2021, ALH Group Property Holdings Pty Ltd v Whittlesea CC [2017] VCAT 2164 [at 101]

⁸⁷ ALH Group Property Holdings Pty Ltd v Whittlesea CC [2017] VCAT 2164 at 86 and 87

⁸⁸ Department of Justice (2011) *Socio-economic impacts of access to electronic gaming machines in Victoria* State Government of Victoria

⁸⁹ Pickernell, D. et al (2013) 'Taking the Gamble: Local and Regional Policy Issues of access to Electronic Gaming Machines (EGMs): A Case Study in Victoria, Australia.' *Australasian Journal of Regional Studies*

⁹⁰ State Government of Victoria (2011) *Socio-economic impacts of access to electronic gaming machines in Victoria – Effects on demand and communities* Department of Justice

There is a substitution effect between gambling and other forms of entertainment which may include tourism.⁹¹

Gaming venues operating out of hotels and clubs in suburban locations are less likely to stimulate tourism compared with other gambling venues such as large casinos.

EGM player loss

Gaming venues are associated with EGM player loss by people both not affected by gambling harms, and those directly and indirectly associated with gambling harms.

The economic benefits associated with net winnings from EGM use accrue to the gambler.

Economic costs of gambling harms include direct costs to state and local government; indirect costs associated with job change, unemployment, bankruptcy, relationship breakdown; costs to the justice system due to criminal incidents; costs to business; and costs of expenditure to the gambler and others.⁹²

Research has found the closure of one venue reduced personal insolvencies by around two.⁹³

While councils do not directly fund services used by people directly and indirectly affected by gambling harms, some incur costs associated with research and policy development, promoting alternatives to gambling and responding to applications for the expansion of gaming activity.⁹⁴

Protective and risk factors

Protective factors may prevent or minimise gambling harms while risk factors may increase the risk or exacerbate existing levels of gambling harms.

Proposal features

The Gaming Commission has found that wherever accessibility to EGMs is increased, there is always a risk of an increase in gambling harms which can lead to other costs such as lost productivity, increased health and social service requirements and other social costs.⁹⁵

Proposals for top ups are typically considered to have a smaller impact on exposure to EGMs than proposals for new gaming venues as a new gaming venue has a larger impact on a community's accessibility to EGMs.

Proposals associated with the closure of a gaming venue reduce the exposure to EGMs as they reduce accessibility to EGMs.

Proposals that enlarge the proportion of the floor area allocated to gambling activities increase exposure to gambling and potentially reduce the proportion of the venue available to patrons to participate in non-gambling alternatives.

Venue features

Availability and quality of non-gambling activities and facilities

There is evidence indicating gambling in 'diffused sites', i.e. venues where gambling is not the main activity within the venue is less intense than gambling within concentrated sites i.e. those venues

⁹¹ State Government of Victoria (2011) *Socio-economic impacts of access to electronic gaming machines in Victoria – Effects on demand and communities* Department of Justice

⁹² Victorian Competition and Efficiency Commission (2012) *Counting the Cost: Inquiry into the Costs of Problem Gambling*, final report, December

⁹³ Badji, S, Black, N, Johnston, D, (2019), *Personal insolvencies and the availability of neighbourhood gaming venues*, Victorian Responsible Gambling Foundation, Melbourne.

⁹⁴ Victorian Competition and Efficiency Commission *Counting the Cost: Inquiry into the Costs of Problem Gambling* 2012

⁹⁵ Commission Decision, Croydon Hotel, paragraph 90; Commission Decision, Dromana Hotel, paragraph 59, Commission Decision, Mornington on Tanti, paragraph 94, Commission Decision, Zagame's Berwick, paragraph 53

where gambling is the primary activity in the venue.⁹⁶ There is also evidence that the presence of a wide range of non-gambling activities is a protective factor.⁹⁷

One of the decision guidelines in Clause 52.28 Gaming of the Victoria Planning Provisions is the range of services and 'offer' provided by the gaming venue. The availability of non-gambling activities and facilities in a proposal site may be a protective factor if they operate at the same time as the gambling facilities and activities.

Type

In some instances, the Tribunal and the Commission have regarded hotel venues as riskier than club venues for the following reasons:

- Club activities, including the use of EGMs, are typically restricted to members of the club rather than the broader public, hence reducing overall exposure within the community. This membership arrangement has the potential to build community networks and enable patrons to develop long term relationships with staff and other patrons.⁹⁸
- Clubs tend to offer a broader range of non-gambling social, leisure, sport and entertainment activities which provide diversionary activities other than gambling.⁹⁹

Other factors that may make hotels riskier than clubs is if they are associated with higher intensity alcohol consumption, and higher player loss (total and per EGM) than clubs.

Size

The maximum number of EGMs permitted in Victorian gaming venues (clubs and hotels) is 105.

Larger gaming venues are considered riskier than smaller gaming venues.^{100, 101, 102, 103, 104}

Design

The design of the venue affects exposure to gambling activities for both gambling patrons and patrons of the non-gambling activities.

The following design features of a gaming venue act as protective factors as they reduce exposure to gambling:

- Location of the gaming area is such that gaming patrons are required to pass through non-gambling activities to enter the gaming area.
- Self-closing doors at the entrance to the gaming area.

⁹⁶ Leino, T. et al (2017) 'Gambling behavior in alcohol-serving and non-alcohol-serving-venues: a study of electronic gaming machine players using account records' *Addiction Research & Theory* 25.:3, 201-297

⁹⁷ Hing, N. and Haw, J (2010) *The Influence of Venue Characteristics on a Player's Decision to Attend a Gambling Venue* Centre for Gambling Education and Research

⁹⁸ Thomas, A. Et al (2010), *Problem gambling vulnerability: The interaction between access, individual cognitions and group beliefs/preferences* Victorian Government, Office of Gaming and Racing, Department of Justice pxiii

⁹⁹ Hing, N. and Haw, J. (2010) *The Influence of Venue Characteristics on a Player's Decision to Attend a Gambling Venue* Gambling Research Australia

¹⁰⁰ Hing, N. and Haw, J (2010) *The Influence of Venue Characteristics on a Player's Decision to Attend a Gambling Venue* Centre for Gambling Education and Research

¹⁰¹ Rockloff, M (2010) *The impact of an audience and venue size on poker machine gambling* Central Queensland University Institute of Health and Social Science Research,

¹⁰² Blaszczynski, A et al (2001) *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 p17

¹⁰³ Rockloff, M; Greer, N and Evans, L (2012) "The Effect of Mere Presence on Electronic Gaming Machine Gambling" *Journal of Gambling Studies*, October 2012, Issue 27

¹⁰⁴ Leino, T. et al (2017) 'Gambling behavior in alcohol-serving and non-alcohol-serving-venues: a study of electronic gaming machine players using account records' *Addiction Research & Theory* 25.:3, 201-297
https://www.academia.edu/32303619/Leino_T._Sagoe_D._Griffiths_M.D._Mentzoni_R.A._Pallesen_S._and_Molde_H._2017_.Gambling_behavior_in_alcohol-serving_and_non-alcohol-serving_venues_A_study_of_electronic_gaming_machine_players_using_account_records._Addiction_Research_and_Theory_25_201-207

- Screening behind self-closing door at the entrance to the gaming area.
- Access to natural light from the gaming area.
- Lines of sight from the cashier's office to all EGMS.
- Screening of external windows with obscure glass to minimise exposure of the EGMS to passers-by.
- Noise attenuation measures in the gaming area to absorb sounds.
- Visual and functional separation of children's play areas from the gaming area.

The following design features of a gaming area act as risk factors:

- Entrance to the gaming area directly off the car park or street.
- Location of smoking area off a gaming area.
- Multiple entrances to the gaming area.
- Lines of sight into the gaming area from entrances and windows.
- Multiple lines of sight into a gaming area from non-gambling facilities.

Venue operations/harm minimisation

Responsible service of gambling refers to harm minimisation practices used in gambling venues and businesses. It includes both responsible service and consumption of gambling, enabling consumers in a regulated environment to make informed decisions about their participation in gambling.¹⁰⁵ These measures are required by law and are a statutory protective factor.

The Productivity Commission found "even policy measures with modest efficacy in reducing harm will often be worthwhile".¹⁰⁶

The presence of highly trained staff in the gaming area can be a protective factor against gambling harms.

There is limited evidence available to confirm the effectiveness of most individual responsible gambling measures which are implemented in a gaming venue.¹⁰⁷ Policy measures implemented outside the control of venues (such as ATM removal, reduction in bet limits, EGM features and the prohibition of smoking) are effective.¹⁰⁸

The limited potential for responsible service of gambling measures to prevent and minimise harms associated with problem gambling has been acknowledged by the Tribunal. It has been determined that an applicant's commitment to responsible service of gambling and implementation of other harm minimisation measures is 'in itself not a panacea for dealing with problem gambling'¹⁰⁹ and harm minimisation measures are not a 'silver bullet to the ills of problem gaming'.¹¹⁰ This is because, despite the implementation of these measures over a number of years, "the issue of problem gaming remains a very live and serious one, despite greater awareness and effort in the gaming industry regarding responsible gaming in recent years".¹¹¹

¹⁰⁵ Livingstone C. Rintoul A. & Francis L. (2014) *What is the evidence for harm minimisation measures in gambling venues?* Evidence Base 2: 1-24 p2

¹⁰⁶ Productivity Commission (2010) p2

¹⁰⁷ Livingstone C. Rintoul A. & Francis L. (2014) *What is the evidence for harm minimisation measures in gambling venues?* Evidence Base 2: 1-24

¹⁰⁸ Livingstone C. Rintoul A. & Francis L. (2014) *What is the evidence for harm minimisation measures in gambling venues?* Evidence Base 2: 1-24 p17

¹⁰⁹ Melbourne City Council v Kingfish Victoria Pty Ltd (2013) VCAT 371 Paragraph 170

¹¹⁰ Mt Alexander Shire Council v Victorian Commission for Gambling and Liquor Regulation Ltd (Red Dot) [2013] VCAT 101(14 February 2013)

¹¹¹ Melbourne City Council v Kingfish Victoria Pty Ltd (2013) VCAT 371 Paragraph 170

From 30 August 2023 the statutory trading hours for Victorian venues is 10 am and 4 am, and in line with hours specified in their liquor licence.¹¹²

The Productivity Commission (2010) identified opening hours as a risk factor and has therefore recommended shutdown periods of at least 6 hours commencing no later than 2am.¹¹³ Recent research has found that the use of EGMs in the late night (12am to 8am) is associated with higher intensity gambling and an increased risk of gambling harm.¹¹⁴

Employees in gaming venues are at risk of gambling harms.¹¹⁵ Some Responsible Service of Gaming Codes of Conduct prohibit their staff from using EGMs at their place of employment.

Rewards programs associated with the accrual of rewards from player loss on EGMs may encourage people to gamble.

Venue operations permitting the serving and/or consumption of food and beverages at EGMs and the reservation of EGMs discourage breaks of play.

Locational features

Availability of non-gambling activities and facilities

Availability of non-gambling activities and facilities in the surrounding area that operate at the same time as the gaming area is a protective factor as they provide patrons with alternatives to gambling activities. These facilities may include cinemas, community centres, restaurants and cafes, pubs, sport and recreation centres and clubs.

Convenience gambling

Convenience gambling involves the provision of gambling opportunities in local community settings that are easily accessible and frequently visited.¹¹⁶ They are typically geographically accessible, integrated into routine social environments, and available with minimal planning or effort, leading to spontaneous and impulse gambling. Venues associated with predetermined decisions to travel, i.e. destination gaming venues, are considered to pose lower risks than convenience gaming venues.

The location of the venue in relation to other land uses and activities in the surrounding area, is one factor influencing spontaneous and impulse gambling. Functional and visual integration with, and proximity to the following land uses and activities have the potential to result in or exacerbate convenience gambling:

- Residential land uses
- Facilities associated with people's day to day activities such as train stations and transport interchanges, civic buildings, shopping strips and shopping centres.
- Services and facilities used by people experiencing gambling harms (gambling-sensitive uses).

Groups at an elevated risk of gambling harm

Proposals that relocate EGMs away from areas of relatively high socio-economic disadvantage reduce the impact of EGM player loss on the incidence of gambling harms among groups in the community at an elevated risk of gambling harm. The potential for this protective factor to mitigate the impact of gambling harms depends on the extent of socio-economic disadvantage and vulnerability in the community within which the EGMs have been relocated.

¹¹² Pursuant to the Gambling Legislation Amendment Bill 2023

¹¹³ Australian Government Productivity Commission (2010) p14.35

¹¹⁴ Stevens, M and Roy Morgan Research (2023) Impact of electronic gaming machine (EGM) late night play on EGM player behaviours Commissioned by NSW Responsible Gambling Fund

¹¹⁵ Hing, N and Gainsbury, S (2011) 'Risky business: Gambling problems amongst gaming venue employees in Queensland, Australia' *Journal of Gambling Issues* Issue 25, June 2011

¹¹⁶ Victorian Competition and Efficiency Commission (2012). *Counting the Cost: Inquiry into the Costs of Problem Gambling*.

New and emerging communities

Melbourne's interface councils experience significant service deficits and social isolation. New residents face challenges such as establishing a new home, changing work or community patterns, getting to know their new recreational environment, making new connections and building a sense of community. They are also characterised by high car dependency, lower job provision ratios, limited access to non-gambling facilities and activities and poor work life balance.¹¹⁷

¹¹⁷ Kinetica and K2 Planning (2021) *Building Resilience in New and Emerging Communities* Northern Metropolitan Partnership Group

Appendix 4 – Vulnerability to gambling harm, proposal site's catchment

Locality in catchment	SEIFA score	One parent families with children %	Lone person households %	Aboriginal and Torres Strait Islander %	Speaks a language other than English %	Recent arrivals %	People not fluent in English %	Medium lowest individual income quartile	Low income households %	Unemployment rate %	Rent social housing	Households with mortgage stress % (> 30% of income)	Households with rental stress % (>30 % income)	People with a long term health condition %	People with a mental health condition (including %)	People with below Year 11 schooling %	People with no qualifications %
Officer Precinct*	1056	11.3	15.4	0.4	28.2	16.7	2.4	21.1	11.4	4.1	0.1	14.0	25.6	27.5	7.8	20.5	33.3
Pakenham Balance*	1047	9	13.8	1.1	9.0	11.3	1.5	24.7	14.3	4.9	0	21.7	11.9	28	6.9	32.7	42
Pakenham Precinct*	983	14	22.7	1.2	20.7	17.0	2.8	27.8	21.4	5.4	1.5	17	35	33.7	11	31.5	40.9
Berwick**	1055	10.7	16.9	0.5	28.5	13.3	3.0	23.1	15.3	4.9	0.8	14.2	27.7	30.9	8.1	22.8	37.2
Cardinia Shire***	1021	11.7	18.5	1.0	17.8	15.1	2.1	24.5	16.7	4.3	0.8	15.1	31.4	31.1	9.3	28.2	38.1
City of Casey***	995	11.6	15.0	0.7	41.8	16.0	6.0	23.5	15.4	5.7	1.4	18.3	29.9	27.1	7	25.7	40.7
South East Metropolitan Region	1003	10.1	24.2	2.3	31.7	17.1	4.2	23.5	20.1	6	3.5	14.3	28.2	28.1	7.7	24.6	35.9

* Vulnerable relative to Cardinia Shire

** Vulnerable relative to City of Casey

*** Vulnerable relative to South East Metro Region

Source: ABS Census of Population and Housing, sourced by .id consulting