



28 April 2006

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

Dear Ms Walter

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely



**Cheryl Vardon**  
**Chief Executive Officer**  
**Australian Gaming Council**