

4/10/2024

Ministry of Health - Manatū Hauora
PO Box 5013
Wellington 6140

Submission on the Draft Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28

Tēnā koutou katoa

Age Concern New Zealand (ACNZ) welcomes the opportunity to submit comments on the Draft Strategy to Prevent and Minimise Gambling harm 2025/26 to 2027/28. We have a vital interest in preventing harm caused by problem gambling. Much of the social, economic and health harms impact whānau/families across the generations and negatively impact our most vulnerable people and communities.

Overall, we see the Draft Strategy as a positive step forward, however we have some comments and recommendations to offer that are primarily to do with older New Zealanders and problem gambling harm.

About Age Concern New Zealand

Age Concern New Zealand is a trusted charity working in local communities to support older people, their friends and whānau. We have 29 local Age Concerns operating in 40 locations throughout the country and a national office based in Wellington.

Our strategic goal is:

Every older person feels connected, has positive choices and can age well."

Our values of Dignity, Wellbeing, Equity, and Respect for older people are our guiding lights and underpin everything we do.

Our core services include advocacy and public awareness, health promotion, social connection, elder abuse and neglect prevention, and providing support through expert information, advice and referrals.

Our key recommendations for your consideration:

- 1. Acknowledge Te Tiriti o Waitangi as Aotearoa New Zealand's founding document and its role in underpinning the strategy.** The draft strategy speaks of a system focus on those most at risk of harm from gambling and data tells us that Māori are disproportionately harmed by problem gambling. The Draft Strategy, for example, states

on page 7 that Māori are 3.13 times more likely to be moderate risk or problem gamblers than non-Māori and non-Pacific peoples. The intent to provide Kaupapa Māori services is also outlined in the strategic framework. We recommend the strategy is explicit about Te Tiriti o Waitangi rather than implicit in its approach.

2. We recommend a stronger emphasis on priority populations and communities. This includes significantly and speedily reducing the number of Class 4 Gaming Machines in more deprived areas and providing increased culturally responsive problem gambling support services directly within these neighbourhoods.

Evidence tells us that gambling harm impacts not only the person with the gambling problem, but also their whānau and friends, and potentially workmates and employers. Ultimately problem gambling significantly harms our neighbourhoods and communities.

We are extremely concerned that it is more deprived communities that experience greater harm, in part due to the on-going disproportionate and significantly higher number of high-risk electronic gaming machines or pokies in these neighbourhoods.

The Draft Strategy states that one in five or 20% of New Zealanders experience harm because of their own or someone else's gambling. This is an alarming figure. Māori, Pacific people, Asian and young people are at greater risk of gambling harm. This is consistent with Māori and Pacific people living in New Zealand commonly experiencing poorer outcomes across a wide range of social and economic measures including housing, income, employment and health.

People living on fixed incomes, including those reliant almost solely on New Zealand Superannuation, have few if any options to get out of gambling debt and will also be forced to make choices about what they spend their limited income on. If they have a gambling addiction, buying nutritious food or keeping warm are likely to be sacrificed to remain able to gamble.

These figures are even more disturbing when we factor in Aotearoa New Zealand's changing demographics. Within ten years the over 65 population is expected to reach 1.2 million, with the over 85 age group being the fastest growing.¹

Over 65s are also increasingly diverse with Māori, Pasifika and Asian populations growing at a much faster rate than European/Pakeha seniors. These are the very groups that are currently experiencing the most gambling harm. Without determined multi-level and targeted interventions, these factors are likely to lead to an increasing number of those aged 65 and older experiencing problem gambling harm.

¹ <https://officeforseniors.govt.nz/better-later-life-strategy/>

A 2008 New Zealand study into gambling and older adults found their motivation for gambling was typically to achieve rewards, boredom and the desire to socialise.² There appears to be very little research into gambling harm specifically around prevalence and impact for older New Zealanders, this would be a useful focus in the future.

The Ministry of Health has indicated that 25 to 44 year olds and 45 to 64 year olds experience the most gambling harm.³ As these cohorts continue to age, they are likely to take their patterns of gambling behaviour into older age, especially as their digital literacy to engage with online gambling will be significant.

We recommend that:

- More research is carried out to determine the gambling harm caused to older New Zealanders
- Initiatives are developed to raise awareness of gambling harm amongst older people
- Health and social services increase screening for gambling harm when working with older clients

3. Increase the funding available for effective prevention and support services such as the Problem Gambling Foundation, kaupapa Māori, Pacific, Asian and youth focused services

We acknowledge that the funding to address gambling harm has increased under the Draft Strategy but consider that it is insufficient to meet the demand. Given the amount of profit made by gambling providers we would like to see the proportion reinvested into preventing gambling harm increased. Support agencies are typically non-government organisations, and we would like to see their workforce and services properly resourced and expanded.

We are also aware that many New Zealanders are struggling in the current economic climate. There are growing numbers of unemployed, and the cost of housing, food, rates, insurance, energy and transport are hitting hard. This may lead to increased gambling, rather than less, in the hope of escaping day-to-day hardship.

² <https://www.psychology.org.nz/journal-archive/NZJP-Vol371-2008-3-Clarke.pdf>

³ https://www.youtube.com/watch?v=ENX1RjqJyOA&embeds_referring_euri=https%3A%2F%2Fwww.health.govt.nz%2F&source_ve_path=OTY3MTQ

4. Regulate online gambling which provides an invisible and easily accessible avenue for gambling harm

We understand that an increasing number of online gambling options are available, which are unmonitored and unregulated, including overseas online gambling sites. These are easy to access any time of the day or night, and the amount of harm caused will be unknown.

We support the licensing of online gambling operators and the establishment of high penalty fees for non-compliance with regulations.

New Zealand, along with many countries, has seen the harm caused by unregulated social media and other online platforms, it is important that we act quickly to reduce the risk of online gambling exponentially increasing gambling harm.

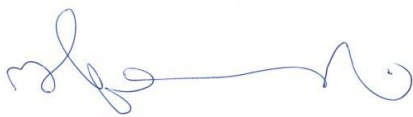
5. Prohibit advertising by gambling operators including online gambling sites

Although we recognise that the majority of people who gamble do so without experiencing harm, for the wider public good, we recommend that advertising by gambling operators is prohibited. The availability and visibility of a product or service influence its acceptability and uptake. The ending of tobacco advertising and sponsorship, for example, has had a positive influence on reducing smoking uptake so addiction to gambling would likely be similarly reduced.⁴

Closing comment

Thank you again for the opportunity to provide our submission on the Draft Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28. We look forward to hearing the outcome of the consultation process.

Nāku noa, nā,



Karen Billings-Jensen
Chief Executive
Age Concern New Zealand

⁴ https://cancercontrol.cancer.gov/sites/default/files/2020-06/m19_7.pdf