

14 August 2025

Committee Secretariat
Governance and Administration Select Committee
Parliament Buildings
Wellington

Submission on the Online Casino Gambling Bill

Tēnā koutou

Age Concern New Zealand welcomes the opportunity to submit comments on the *Online Casino Gambling Bill*. This Bill is relevant to all New Zealanders as well as Age Concern New Zealand and many other charities providing essential services within local communities throughout Aotearoa New Zealand.

Gambling harm affects many New Zealanders. Data shows that one in five New Zealand adults experience gambling harm across their lifetime.¹ This can be the result of their own gambling behaviour or that of their whānau members and friends. Older people within New Zealand Aotearoa may experience gambling harm either directly through their own gambling habit or that of their spouse, adult children or grandchildren. Age Concern elder abuse social workers encounter the harm experienced by older people which can be through family members pressing them for money to support their gambling addiction or to pay off gambling debt. This can include the family member using the older person's credit or eftpos card for their gambling against the older person's wishes. We also hear of family members moving in with their ageing parent or grandparent, contributing very little toward household costs, in order to fund their own gambling addiction.

Reaching out for help to manage the impact of problem gambling is challenging. It can be embarrassing for any person to acknowledge they personally have a gambling problem or are being pressured to help fund a family member's gambling or pay off their debts.

We are concerned about the addictive nature of online casino gambling and the kind of harm that results from this particular mode of gambling which involves instant gratification. It is vital that any changes to the gambling operator environment prioritises reducing gambling harm and protecting consumers.

¹ <https://www.pgf.nz/knowledge-hub/gambling>

We are submitting on the *Online Casino Gambling Bill* primarily because of the increased harm that will result for individuals, whānau and communities. We are also concerned that there is currently no requirement in the Bill for licensed online casinos to provide community grants from their profits. Community grants are essential to the sustainable delivery of many social services, sports clubs and other not-for profits. We see no reason for licensed online casinos to be exempt from providing community grants for New Zealand charities. We believe gambling operators have a social responsibility to individuals and communities to help fund community groups that provide much needed services to New Zealanders impacted by the social issues created by gambling addiction.

We are also concerned about money from New Zealanders going offshore to the benefit and profit of offshore online gambling providers. We support any measures the Government can put in place to regulate and limit that outcome.

About Age Concern New Zealand

Age Concern New Zealand is a trusted charity working in local communities throughout Aotearoa New Zealand 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, social connection, health promotion, elder abuse and neglect prevention, and providing support through expert information, advice and referrals.

We are proud of our heritage in standing up for the rights of older New Zealanders for more than 50 years. As an organisation, our focus is on contributing to the overall wellbeing of older New Zealanders.

Our Comments

1. Age Concern New Zealand is concerned at the negative impact of online casinos which increase access to gambling and inevitably result in increased harm. Many New Zealanders are currently struggling with high living costs. Greater access to online casinos will mean individuals and whānau are pushed beyond the financial distress they are already in, especially those living on low fixed incomes, including some superannuitants.

2. We understand the Bill does not currently require licensed online casino operators to provide community grants with a percentage of their profits, in the same way as the Lotteries Commission and the TAB. If the Bill proceeds, we strongly recommend adding a requirement for licensed online casino operators to provide community grants at the same rate that the Lotteries Commission and the TAB are required to do. The not-for-profit sector is operating in a very constrained funding environment. We see the opportunity for any new gambling providers to help fund charities and not-for-profits that achieve significant benefit to communities throughout New Zealand Aotearoa.
3. We are concerned at the additional risk presented by online gambling because of how readily accessible and invisible it is. Online gambling is available anywhere, anytime on any device. This means it will potentially cause considerable harm that is out of sight, and which may not easily be picked up by family members or problem gambling services. Older people for example, if they lose their mobility as they age, may access online gambling as a form of entertainment. Social isolation and boredom can be drivers for older people engaging with gambling. Unfortunately, if they get into debt and have little other than their New Zealand Superannuation to live on, they cannot easily get out of that debt. They may well go without heating and healthy food to fund their own or a family member's gambling addiction. From our experience working with older adults, recovering from events such as later life shocks, severe weather events or getting out of debt is hugely problematic for many.
4. Currently gambling harm disproportionately affects Māori, Pasifika, Asian populations and young people which Government and operators must specifically address.^{2 3} We understand these groups are more than twice as likely to experience gambling harm than the general population. This issue is not addressed in the *Online Casino Gambling Bill* and we would like to see it covered explicitly.
5. We are concerned that data shows that “gambling causes over twice the amount of harm as chronic diseases and three times the amount of harm from drug use disorders”.⁴ This level of harm is alarming and again calls in to question the logic of introducing and mandating more online gambling operators. A licensing regime and strict regulation will go some way to mitigating the harm, but we remain concerned about how effectively harm will be minimised and consumers protected.

² <https://www.dia.govt.nz/Gambling-territorial-authorities-policy-review-process-understanding-gambling-community>

³ <https://www.pgf.nz/knowledge-hub/gambling>

⁴ <https://www.pgf.nz/knowledge-hub/gambling>

Our Recommendations

Age Concern New Zealand offers the following recommendations:

1. Prioritise protecting people and communities from gambling harm in government decision-making about online casinos.
2. Establish and rigorously implement the licensing regime along with robust regulations around online casino gambling. We further recommend the hours of operation are limited given how accessible online gambling is for people, especially those at highest risk of harm.
3. Add a requirement to the Amendment Bill that all licensed online casinos provide community grants within Aotearoa New Zealand from their profits in the same way that existing online gambling operators are required to do, such as the Lotteries Commission. This puts at least a portion of their revenue into achieving public good.
4. Provide greater clarity in the Bill around what licensed online casino operators would need to do to reduce gambling harm and protect consumers. These are positive concepts but are open-ended and generic. We would like to see the Amendment Bill being more prescriptive about what should be written in gambling operators' plans and actioned by them. We expect that licensed online casino operators' actions to reduce harm and protect consumers will be closely monitored.
5. Add a section to the Amendment Bill about how people most at risk of gambling harm would be specifically protected. Currently gambling harm disproportionately affects Māori, Pasifika, Asian populations and young people which Government and operators must explicitly address.⁵ These groups are more than twice as likely to experience harm than the European and other population groups.⁶
6. Prohibit unlicensed online casinos from advertising and limit advertising by licensed online casino operators.
7. Significantly reduce the maximum number of online casino licenses from 15 so that the impact of further online casinos can be monitored and problems identified and addressed. We would suggest a maximum of three to five licenses initially.

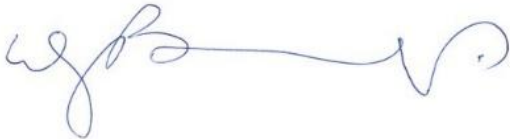
⁵ <https://www.dia.govt.nz/Gambling-territorial-authorities-policy-review-process-understanding-gambling-community>

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Closing Comment

Thank you again for the opportunity to provide our submission on the *Online Casino Gambling Bill*, we are very interested to hear the outcome of the consultation process.

Nāku noa, nā,



Karen Billings-Jensen
Chief Executive
Age Concern New Zealand