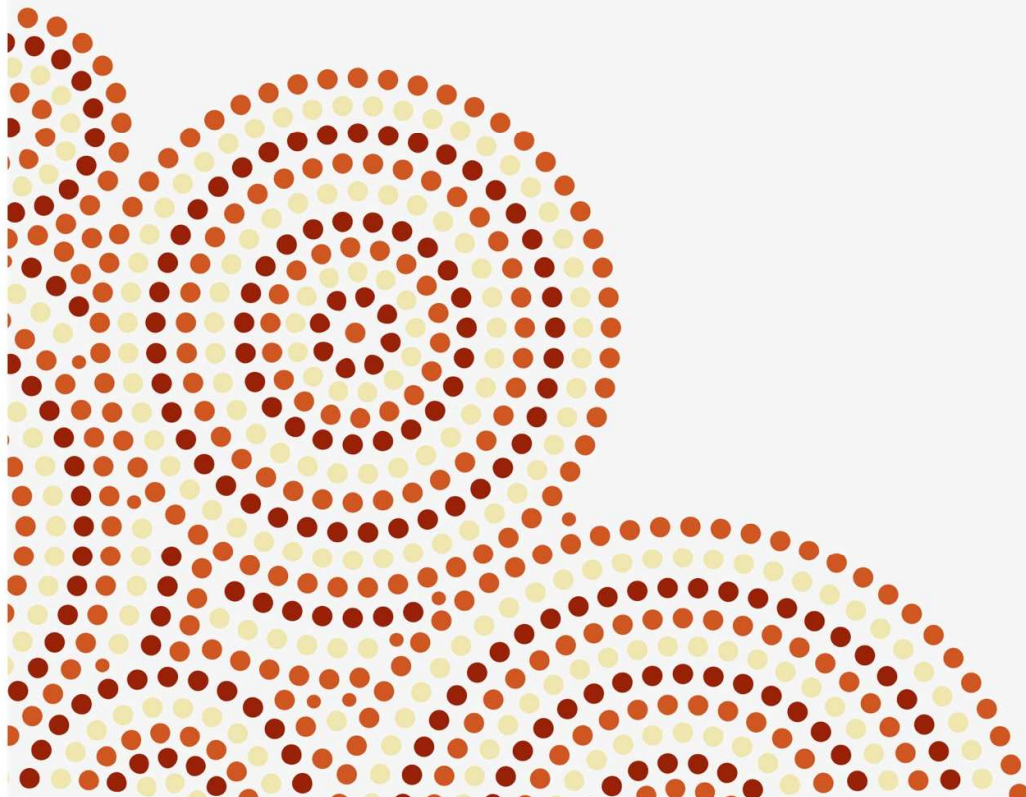


TANGENTYERE  
COUNCIL  
SUBMISSION



# Proposed New Gaming Machines and gaming machine Venues in Mparntwe

Director of Gaming Machines



WORKING  
TOGETHER  
WALKING  
TOGETHER

## 1. Citation

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## 2. Summary

Iris Capital and its subsidiaries: The Trustee for Iris Gap View Operations Trust; The Trustee for Iris Todd Operations Trust; The Trustee for Iris Diplomat Operations Trust; and The Trustee for Iris Stott Terrace Operations Trust are seeking to increase the number of gaming machines and gaming machine venues in Mparntwe/Alice Springs.

In addition to the venues that are subject to proposed increases in gaming machines, Iris Capital, and its subsidiary The Trustee for Alice Springs Casino Operations Trust owns and operates the Lasseters Hotel Casino.

Iris Capital and subsidiaries commenced local operations with the acquisition of Lasseters Hotel Casino in November 2021. Subsequent venues have been acquired more recently.

The following table outlines the current and proposed gaming machine venues held by Iris Capital and subsidiaries:

Entity	ABN	Business	From	Gaming Machines	
				Current	Increase
Trustee for Iris Gap View Operations	<a href="#">74 797 358 952</a>	Gap View Resort	6/07/22	10	10
Trustee for Iris Todd Operations Trust	<a href="#">48 745 288 287</a>	Todd Tavern	7/07/22	10	10
Trustee for Iris Diplomat Operations Trust	<a href="#">99 800 422 176</a>	Uncles Tavern	30/07/22	0	20
Trustee for Iris Stott Terrace Operations	<a href="#">91 227 482 707</a>	Alice Springs Resort	19/07/22	0	20
Trustee for Alice Springs Casino Operations	<a href="#">42 551 060 580</a>	Lasseters Casino	10/11/21	380	
Total				400	60
Gaming Machines (Other Venues)				110	

Iris Capital and subsidiaries have procured the services of an interstate consultant- DNS Specialist Services to develop Community Impact Assessments for the proposed expansions.

Tangentyere Council Aboriginal Corporation (TCAC) opposes the proposed increases to gaming machines and gaming machine venues.

Please accept this as a combined submission in opposition to applications for additional gaming machines and new gaming machine venue licences for (1) Gap View Resort; (2) Todd Tavern; (3) Uncles Tavern; and (4) Mercure.

## 3. Background

TCAC is an Aboriginal Community Controlled Organisation (ACCO) delivering human services for the benefit of Aboriginal people from Alice Springs, its Town Camps and Central Australia.

TCAC has 16 Town Camp Corporate Members, over 600 Individual Members and provides services to more than 10,000 people from a region that covers approximately 873,894 km<sup>2</sup>. The TCAC Board of Directors is composed of the elected Presidents of the 11 Associations and 5 Aboriginal Corporations

The work undertaken by TCAC is aligned with action on the social, environmental, and behavioural determinants of health and wellbeing. Programs delivered throughout Central Australia include: (1) Child Protection and Wellbeing; (2) Children and Schooling; (3) Community Safety; (4) Alcohol and Other Drugs; (5) Tenancy Support; (6) Employment; (7) Aged and Disabled; (8) Chronic Disease Care Coordination; (9) Family Violence Prevention; (10) Housing Maintenance; (11) Municipal and Essential Services; (12) Construction and (15) Art and Culture.

The 16 Alice Springs Town Camp Associations/Aboriginal Corporations and TCAC were formed by Town Campers to support their efforts to gain access to Land; Housing; Infrastructure; and Municipal and Essential Services. TCAC was incorporated in 1979 as an Aboriginal Community Controlled Housing Organisation (ACCHO).

Between 1979 and December 2009 TCAC was an ACCHO for the Town Camps. Since December 2009 the Territory has been the Housing Authority for the Town Camps.

The Corporate Membership of TCAC includes the Associations/Aboriginal Corporations that hold Special Purpose and Crown Leases in Perpetuity over the Town Camps. These Associations/Aboriginal Corporations entered Tripartite Alice Springs Living Area Subleases with the Commonwealth Executive Director of Township Leasing (EDTL) and the Territory CEO of Housing (CEOH) in December 2009. The EDTL subsequently entered into Housing Management Agreements (HMAs) with the Territory. The Territory has been the Housing Authority since December 2009.

TCAC and its Subsidiary, Tangentyere Constructions and Related Party, Community Housing Central Australia (CHCA) continue to deliver Housing Related Services under contract from the Territory.

TCAC and the Territory executed a Local Decision-Making (LDM) Agreement in July 2020. One key element of the LDM Agreement between TCAC and the Territory is to transition from Public Housing to Community Housing on the Alice Springs Town Camps. The development of a Community Housing Model is on track for this transition to coincide with the expiration of the current Housing Management Agreements between the EDTL and the CEOH.

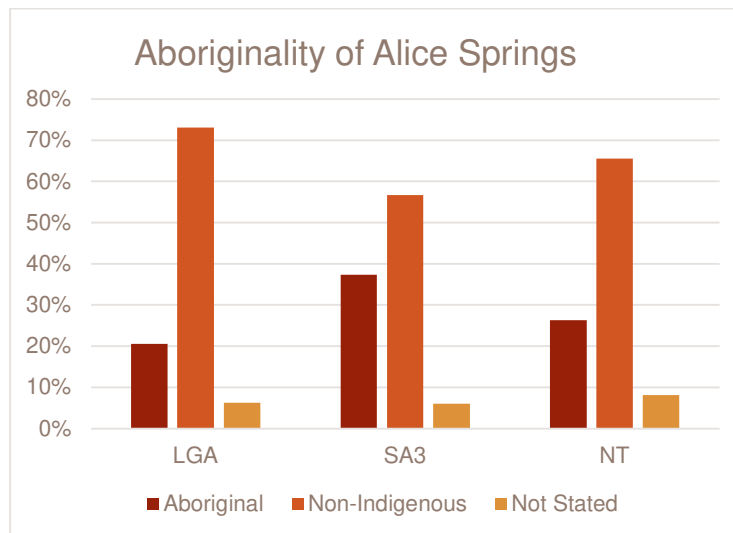
#### 4. Community Impact Statements

There are several key themes in the individual Community Impact Statements that TCAC would like to address. These relates to assumptions about demography, harm, local experience, and consultation.

##### 4.1. Demography

The first issue relates to the interpretation of the Aboriginality of Mparntwe. The Community Impact Statements make the comparison between the Alice Springs Local Government Area and the Northern Territory.

The consultant reaches the following conclusion ‘the LGA has a lower percentage of Indigenous Australians in comparison to the NT (20.6% compared to 26.3%), this is likely due to the city centre nature of the LGA, and the large proportion of Aboriginal Communities located in the wider region’. A truer reflection of the population is obtained when reflecting upon Mparntwe as the major service centre for the Alice Springs SA3 Region. 37% of the Alice Springs SA3 Region is Aboriginal.



##### 4.2. Productivity Commission Interpretation

The Community Impact Statement also includes the following statement that “according to the Productivity Commission (2010) Inquiry Report non-Indigenous residents are less likely to show signs of pathological gambling when compared to Indigenous residents. The LGA appears less likely to be at risk of problem gambling those other areas of the NT”.

The Community Impact Statement could have included other quotes from the Productivity Commission Report including the following: (1) ‘the risks of problem gambling are low for people who only play lotteries and scratchies but rise steeply with the frequency of gambling on table games, wagering and, **especially, gaming machines**’; (2) ‘15% of regular players are problem gamblers. Their share of total spending on machines is estimated to range around 40%’; (3) there is ‘a significant social cost of problem gambling estimated to be at least \$4.7 billion per year’ nationally; and (4) that greater accessibility of gaming machines is linked to higher levels of problem gambling- i.e., the ‘extensive liberalisation of gaming machines in the eastern states had a marked impact on problem gambling’.

Ultimately the Productivity Commission provides an outline of different groups that have a vulnerability to problem gambling and that the impacts of problem gambling extend beyond problem gamblers themselves. Problem gambling has a demonstrably negative impact on public health outcomes and can be considered both social determinants and symptom of health.

#### 4.3. Local Experience

Another inaccuracy of the Community Impact Statements is the claim that ‘the applicant has significant experience in the management of licenced venues in the Alice Springs Region’. Iris Capital purchased the Lasseters Casino 8 months ago in November 2021. The applicants acting on behalf of the other 4 venues were registered in April 2022. The registration of the applicants and their purchase of these venues in July 2022 is very recent. Iris Capital has extensive experience elsewhere but not here.

#### 4.4. Consultation

The Community Impact Statement provides an outline of attempts at consultation with stakeholder organisations. The consultant invited 10 stakeholders to participate in a short survey, this included- Aboriginal Hostels Limited; Alice Springs Men’s Hostel; Alice Springs Youth Centre; Amity; Anglicare NT; CatholicCare NT; Lutheran Care; Multicultural Community Services of Central Australia; Relationships Australia; and Flynn Memorial Uniting Church. Stakeholders including all local Aboriginal Community Controlled Aboriginal Corporations; Central Land Council; Registered Native Title Bodies and Health Services were excluded.

It seems like little feedback that was received indicated a strong opposition to more gaming machines and venues.

### 5. Gaming Machines and Venues

Australia has the 11<sup>th</sup> highest prevalence of gaming machines per adult. The national prevalence of 123 adults per gaming machine is dwarfed by the Alice Springs prevalence of 37 adults per gaming machine.

The following table outlines this issue:

Entity	Business	Current	Gaming Machines	
			New	Increase
Trustee for Iris Gap View Operations	Gap View Resort	10	10	20
Trustee for Iris Todd Operations Trust	Todd Tavern	10	10	20
Trustee for Iris Diplomat Operations Trust	Uncles Tavern	0	20	20
Trustee for Iris Stott Terrace Operations	Alice Springs Resort	0	20	20
Trustee for Alice Springs Casino Operations	Lasseters Casino	380	0	380
Gillen Club Inc.	Gillen Club	55	0	55
Club Eastside Inc.	Club Eastside	55	0	55
Total		510	60	570
Adults/Gaming machine (Mparntwe)		37		33
Adults/Gaming machine (National)		123		

Nb- Iris Capital and subsidiaries has 400 gaming machines in Alice Springs. If the applications are successful, they will have 460 gaming machines. At present Iris Capital has 3 gaming machine venues but this will become 5 if their applications are successful.

An excerpt from Ziolkowski (2017), World Count of Gambling Machines has been included overleaf.

**Table 1: Top 11 countries by prevalence of gaming machines**

Rank	Country	People per gaming machine	People per poker machine
1	Sint Maarten	13	N/A
2	Åland Islands	16	449
3	Japan	28	N/A
4	Monaco	31	31
5	Aruba (Netherlands)	32	N/A
6	Macao (China)	43	43
7	Curacao	64	N/A
8	United States Virgin Islands	79	N/A
9	Antigua and Barbuda	115	N/A
10	St Kitts and Nevis	118	N/A
11	Australia	123	124

Source: Ziolkowski (2017) *World Count of Gaming Machines 2016*, p 10, 13

At present there is gaming machine venue in the centre of Alice Springs. If the applications for Uncles and Mercure are successful, the geographical spread of outlets will be more persuasive. Accessibility is a significant issue for problem gambling.

## 6. Local Social and Environmental Determinants

Service delivery by TCAC has been developed in collaboration with our stakeholders to address a range of social and environmental determinants.

The following list of factors is not exhaustive but does reflect key areas that have been identified by our stakeholders as significantly impacting on their health and wellbeing. These factors are directly relevant to the proposed expansion of gaming machines and gaming venues.

### 6.1. Homelessness

In the Northern Territory has the highest rate of homelessness in Australia at a rate of 599 people per 10,000 people compared to the national rate of 50 people per 10,000 people nationally (ABS, 2016).

Homelessness includes persons living in improvised dwellings, tents, or sleeping out and other forms of homelessness.

### 6.2. Overcrowding

The Northern Territory (NT) has a well-publicised shortfall of social housing stock, reflected in its public housing waitlist times, homelessness statistics and measures of unmet housing. The now disbanded National Housing Supply Council reported an overall shortfall of 10,300 dwellings to meet demand in the in June 2010, for an estimated resident population of 229,700 (Tangentyere Design, 2017)<sup>i</sup>.

The Alice Springs Town Camps are part of the NPA Footprint. The NPA Footprint includes 73 remote communities and 18 Alice Springs Town Camps (Klerck, 2020)<sup>ii</sup>. The total number of dwellings in this region is 5,100 including 4,646 that are occupied and 454 that are vacant (Klerck, 2020). The NT Estimated Resident Population (ERP) for this region is 36,327 or approximately 8 people per dwelling (Klerck, 2020). The Australian Bureau of Statistics 2016 Census estimates that the population for this region is 33,519 or approximately 7 people per dwelling (Klerck, 2020). TCAC conducted a Town Camp Population and Mobility Study in 2005 that estimated the resident population to be 1,950 and the service population to be 3,300 (Foster et al, 2005)<sup>iii</sup>. Noting that the 2005 figures were based on 199 dwellings, they indicate

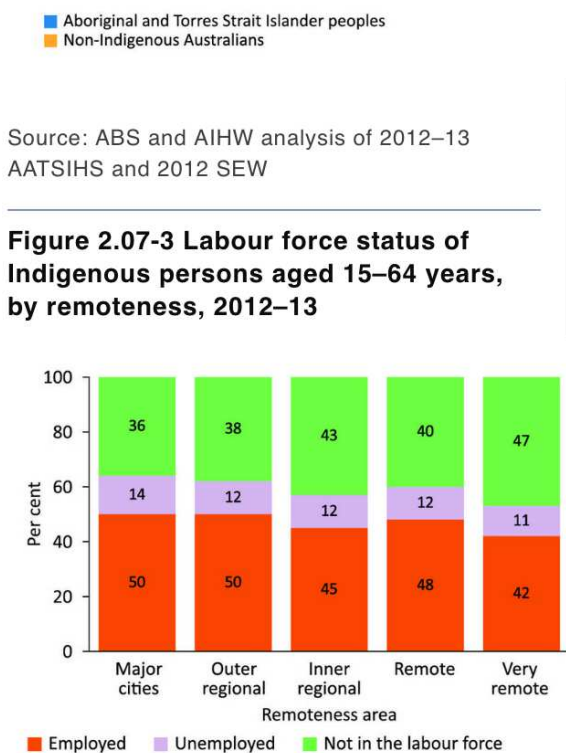
that the level of overcrowding was far higher than the current DLGHCD and ABS figures. The unique aspect of the Population and Mobility Study is that it attempted to quantify the impact of mobility between remote Central Australia and Alice Springs. Much has been written about the issue of mobility and/or urban drift, but most fails to provide a grassroots perspective.

### 6.3. Poverty

A significant proportion of the residents of Alice Springs and Central Australia receive income support payments. TCAC is concerned that a proportion of the population that is entitled to receive income support payments does not.

According to the following table only 48% of Aboriginal people aged 15-64 from remote areas including Alice Springs are employed, 12% are unemployed and the 40% are not in the labour force. TCAC is concerned that many people designated as 'not in labour force' simply don't receive any income.

The data from very remote communities in the Alice Springs SA3 Region is more confronting with only 42% of Aboriginal people aged 15-64 from very remote areas are employed, 11% are unemployed and 47% are not in the labour force. Once again TCAC is concerned that many people designated as 'not in labour force' simply don't receive any income.





#### 6.4. Prepayment Power Meter Disconnections

Prepayment Meter (PPM) Self-Disconnections are an indicator of multidimensional disadvantage and poverty. Energy insecurity undermines outcomes aligned to housing and health. Jacana Energy provided TCAC with consolidated PPM Self-Disconnection data for Darwin, Katherine, Alice Springs, and Tennant Creek.

Self-Disconnection means and interruption to the supply of energy because the PPM system has no credit (including emergency or friendly credit) available.

The data includes: (1) Number of PPMs; (2) Number of PPMs that Self-Disconnected; (3) Total Number of PPM Self-Disconnections; and (4) Duration of Self-Disconnections.

The data is outlined in the following figures:

Figure: Number of PPMs	PPM				
2019/2020	Q1	Q2	Q3	Q4	Q Mean
Darwin	480	478	483	478	480
Katherine	624	623	618	607	618
Alice Springs	424	427	430	424	426
Tennant Creek	552	557	550	540	550
Total	2080	2085	2081	2049	2074

Nb- this data provided by Jacana Energy (Jacana Energy 2021, pers. comm., 20 February). The Q Mean is the average number of PPMs across Q1, Q2, Q3 and Q4.

Figure: Individual PPMs Disconnecting	Individual PPMs Disconnecting				%
2019/2020	Q1	Q2	Q3	Q4	Q Mean
Darwin	240	353	359	304	65%
Katherine	393	526	513	449	76%
Alice Springs	327	410	413	402	91%
Tennant Creek	260	358	368	312	59%
Total	1220	1647	1653	1467	72%

Nb- this data provided by Jacana Energy (Jacana Energy 2021, pers. comm., 20 February). The % Q Mean is the % of PPMs that Self-Disconnected (>1 time) as an average across Q1, Q2, Q3 and Q4.

Figure: Total PPM Disconnections	Total Disconnections				
2019/2020	Q1	Q2	Q3	Q4	Q Mean
Darwin	1247	4569	4929	3506	3563
Katherine	1539	5431	5429	3495	3974
Alice Springs	2635	6463	7184	6981	5816
Tennant Creek	1641	5383	5542	3914	4120
Total	7062	21846	23084	17896	17472

Nb- this data provided by Jacana Energy (Jacana Energy 2021, pers. comm., 20 February). The Q Mean is the total number of Self-Disconnections as an average across Q1, Q2, Q3 and Q4. The Q Mean across all sites was 17,472 Self-Disconnections.



Figure: Average Duration Disconnection	Average Duration Disconnection Events (Minutes)				
2019/2020	Q1	Q2	Q3	Q4	Q Mean
Darwin	319	336	362	235	313
Katherine	396	460	385	330	393
Alice Springs	349	433	496	331	402
Tennant Creek	258	382	488	272	350

Nb- this data provided by Jacana Energy (Jacana Energy 2021, pers. comm., 20 February).

On average PPMs Self-Disconnected for between 313 and 402 minutes per site across the period.

Based on the values calculated for the quarterly mean for PPMs, PPMs Self-Disconnecting, Total PPM Self-Disconnections, and the Duration of Self-Disconnections in Alice Springs- 91% of PPMs Self-Disconnected on 58 occasions per annum for an average incident duration of 6 hours and 42 minutes.

### 6.5. Rent Debt

The prevalence of rental debt in Remote and Town Camp Public Housing is a systemic issue. Rental debt in Urban Public Housing is also chronic but to a lesser extent than Remote and Town Camp.

The Department of Local Government, Housing and Community Development (DLGHCD) provided the following information during November 2019.

The following table outlines the number of dwellings, the proportion of tenanted dwellings and the proportion of tenanted houses with a rent related debt. This data is for Alice Springs and its Town Camps, and NT Urban and Remote Public Housing:

		Town Camp		Urban		Total	
Location	Dwellings	%	#	%	#	%	#
Alice Springs	Total		284		773		1057
	Tenanted	89%	253	92%	711	91%	964
	Rent Debt	62%	176	34%	263	42%	439
		Remote		Urban		Total	
NT	Total		5209		4914		10123
	Tenanted	93%	4844	96%	4717	94%	9562
	Rent Debt	85%	4428	25%	1229	56%	5656

The DLGHCD was not able to provide a monetary average value for these debts. TCAC understands that this reflects several interrelated challenges. Each tenancy with rent related debt is vulnerable with its occupants at risk of rooflessness.

The DLGHCD provided some additional information tracking changes in the % of households with debt as a function of time.

		30th June				
		2015	2016	2017	2018	2019
Alice Springs	Town Camp	74%	69%	65%	63%	62%
	Urban	30%	26%	33%	31%	36%
NT	Remote	78%	87%	85%	83%	84%

This information is a snapshot in time. It is noted that the Remote Rent Framework is likely to change. The purpose of including this data is to highlight that there is significant poverty in this region. New gaming machine are not required.

#### 6.6. Proposed New Remote Rent Framework

The Department of Territory Families, Housing and Communities (DTFHC) is proposing to implement a new Remote Rent Framework from 5 September 2022. Under the new Remote Rent Framework, Rental Rebates will be removed for Remote Public Housing.

Changes including the introduction of fixed dwelling-based rent and the cessation of Rent Rebates for Remote Public Housing will result in significantly increased rent for most remote households. This will increase disadvantage and reduce tenancy sustainability. Remote Rent will increase, and Remote Rental Rebates will cease.

According to the NTG most remote households will be impacted.

The following tables summarises the data provided by the DTFHC in its stakeholder briefing:

Region	Households	Households	Tenants with Increased Rent	
	No Increase	Increase	Adults	Children
Arnhem	411	511	2113	814
Arafura	474	946	2989	1206
Barkly	69	290	821	517
Big Rivers	289	520	1782	960
Central Australia	211	868	2368	1188
Total	1454	3135	10073	4685
	32%	68%		

## 7. Conclusion and Recommendations

The 2010 Productivity Commission Report highlights the risk of gaming machines to problem gamblers, that 15% of regular gamblers are problem gamblers, that the social cost of gaming machines is significant (\$4.7 billion per annum nationally), and that the extensive liberalisation of gaming machines has had a marked impact on problem gambling.

Ultimately the Productivity Commission provides an outline of different groups that have a vulnerability to problem gambling and that the impacts of problem gambling extend beyond problem gamblers themselves. Problem gambling has a demonstrably negative impact on public health outcomes and can be considered both social determinants and symptom of health.

TCAC is not calling for an immediate reduction in gaming machines or a reduction in gaming venues, but it is our recommendation that no new gaming machines be permitted in current gaming venues and that no new gaming venues be approved.

TCAC recommends that the NTG review and update governing legislation and reduce the maximum number of gaming machines in clubs and Casinos. At present the number of gaming machines in Casinos is not capped.

Our recommendations are summarised below:

- 1) That the application to increase gaming machines at Gap View Resort be rejected.
- 2) That the application to increase gaming machines at Todd Tavern be rejected.
- 3) That the application for a gaming machine venue licence for Uncles Tavern be rejected.
- 4) That the application for a gaming machine venue licence for Mercure Resort be rejected.
- 5) That details of gaming machine venues be published online.
- 6) That the governing legislation (Gaming Machine Act, 1995) for gaming machines in pubs and clubs be updated.
- 7) That the maximum number of gaming machines in clubs be reduced from the current maximum of 55.
- 8) That the governing legislation (Gaming Control Act, 1993) for gaming machines in Casinos be updated.
- 9) That a maximum number of gaming machines for Casinos be set.

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<sup>i</sup> Tangentyere Design. (2017). Apmere-arenye Interrentye/Accessibility Matters Project Proposal. Alice Springs, NT: Tangentyere Design.

<sup>ii</sup> Klerck, M. (2020). Tangentyere Council, Supplementary Submission to the House of Representatives Inquiry into Homelessness in Australia. Alice Springs, NT: Tangentyere Council Aboriginal Corporation.

<sup>iii</sup> Foster, D, Mitchell, J, Ulrik, J and Williams, R 2005, Population and Mobility in the Town Camps of Alice Springs, A report prepared by Tangentyere Council Research Unit, Desert Knowledge Cooperative Research Centre, Alice Springs.