



14 February 2011

Committee Secretary
Joint Select Committee on Gambling Reform
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Sir

The RSL & Services Clubs Association Queensland Inc welcomes the opportunity to contribute this submission to the Parliamentary Joint Select Committee on Gambling Reform Inquiry into Pre-commitment. This Association also endorses the submissions of Clubs Australia and our sister organisation, the RSL & Services Clubs of NSW.

The RSL & Services Clubs Association ("Association") provides a link between its club members, the government and the community, while fostering the spirit and heritage of the ANZAC traditions.

In Queensland, there are approximately 100 RSL, Services & Memorial clubs located in city and regional areas. They are not for profit, community organisations that support the RSL movement as well as community and charitable organisations. These clubs range in size from small clubs with no gaming machines and a few hundred members to very large clubs with up to 280 gaming machines and tens of thousands of members, with the largest club having over 90,000 members.

RSL clubs embody the Australian tradition of mateship, loyalty and the Anzac Spirit which are highly valued attributes admired by Australian society as a whole. They provide facilities which include dining, bars, function rooms, gaming, TAB and Keno and in some cases, sporting facilities (eg bowls and golf).

Most RSL Clubs are separately incorporated from their local sub branches, but work in close co-operation with them. Approximately, sixty percent of RSL clubs pay rent to their sub branch which owns the buildings in which the club resides. This money is used to pay loans for improvements to the property and to carry out the purpose of the sub branch, ie in the area of welfare for veterans and for patriotic and commemorative purposes.

This Association recently commissioned Lawler Partners (an independent research and consulting firm) to conduct a survey of RSL & Services Club in Queensland over the period December 2010 and January 2011. The selection of an independent research firm was to ensure that there could be no challenges to the validity of the data should the Association undertake the survey in its own right.

There was a 37% response rate to the survey by clubs which represented 48% of gaming machines in RSL & Services Clubs in Queensland. Please refer to figure 1.

Figure 1

Categories of EGMs	All Qld RSL Clubs	Response to survey* %/No. Clubs
Less than 50 EGMs	61%	37.1% (13)
51-100 EGMs	18%	25.7% (9)
101-200 EGMs	13%	25.7% (9)
201-280 EGMs	9%	11.4% (4)

The Association appreciates the opportunity to provide the views of its members to the Joint Committee on Gambling and to share the findings that have emerged from this survey which we hope will give some insight into the possible consequences that are likely to occur should the proposed mandatory pre-commitment changes be implemented in the time frame suggested.

To quote Isaac Newton ***"For every action, there is an equal and opposite reaction."***

This quote is very relevant because this Association believes that in the absence of any cost/benefit analysis or evidence based research into mandatory pre-commitment, there has been no consideration given to what the economic and social ramifications will be if mandatory pre-commitment is introduced in the proposed form and within the proposed time frame.

The RSL & Services Clubs Association of Queensland is not opposed to a system of **voluntary** pre-commitment and as this Committee would be aware, such a scheme is already operating in several clubs and pubs in Queensland at this time. **It is not in the interests of RSL Clubs to place returned soldiers & their families or their members or the families of their members in financial jeopardy. The prime object of RSL Clubs is to look after**

returned soldiers & their families and their members and their families. As such RSL Clubs have placed significant emphasis on harm minimisation with some clubs already having introduced voluntary pre-commitment.

However, we are strongly opposed to pre-commitment becoming mandatory.

This Association believes there are some fundamental flaws in the proposed implementation of mandatory pre-commitment, not least of which is the absence of evidence based research or a cost benefit analysis.

We acknowledge that there are a small number of people (in Queensland the latest Queensland Household Survey estimates 0.37% of the adult population are 'problem gamblers') who may be positively impacted by the introduction of a pre-commitment scheme. Of course, in the absence of any meaningful research in this area, it is questionable to say the least, that a mandatory scheme would have much of an impact on their gambling expenditure. Many experts have predicted that problem gamblers will merely transfer their gambling addiction to other forms of gambling, which are not impacted by the proposed pre-commitment, eg Sports & TAB betting or to online gambling, where there is virtually no regulation.

Christian Capital Advisors have estimated that online gambling around the world has increased from \$US8.3B in 2001 to \$24.7B in 2010 and that Australia has the second highest expenditure of online gambling in the world after Africa.

It could be imagined that a person gambling on credit online in their own home could lose all their assets without getting out of bed in the morning. We don't hear any voices raised in protest at this scenario! It is a very real threat and one that deserves further investigation.

If the unintended consequence of mandatory pre-commitment did result in significant transfer to online gambling, the scenario above could proliferate.

In the club context, the following questions need to be answered in regard to the effects of mandatory pre-commitment:

- Will this have an impact on patronage and to what extent?
- If there is a significant downturn in revenue, what will this mean in terms of
 - Patronage
 - Employment
 - RSL activities
 - Entertainment
 - Impact on the Elderly
 - Community & Sporting Groups
 - Charities
 - Building works
 - Club viability

We will attempt to answer some of these questions by reference to our recently commissioned survey.

In regard to the impact on revenue, there is little doubt that mandatory pre-commitment will have a detrimental impact on revenue, with current estimates ranging from 30-50%.

Lawler's survey adopted a conservative approach in regard to the questions raised. Even though the predictions of reduction in revenue have been in the 30-50% range, we sought answers based on 10%, 20% or 30% reductions in revenue. **The responses are of grave concern.**

Patronage

Although the Lawler survey did not ask questions related specifically to the effect upon patronage if mandatory pre-commitment is introduced, the lessons learned from the introduction of smoking bans in Clubs provide a valid reference point. It is a documented fact (from OLGR statistics) that Clubs across the country suffered a significant downturn in revenue when smoking bans were introduced to hospitality venues.

Employment

The below table (Figure 2) illustrates the potential effect upon loss of employee wages, at the three revenue reduction levels:

- 10% revenue reduction
- 20% revenue reduction
- 30% revenue reduction

The question was asked in the survey as follows:

"This question is to understand how reduction in your club's revenue would affect your workforce. Please estimate how many total employee hours per week (for all club employees) you would need to reduce for each revenue impact listed below. Revenue reduction of 10% per week, total employee estimated hours per week would need to reduce by (number of hours)."

The same question as above was repeated for 20% and 30% reduction.

Assumptions:

- 94 clubs in total.
- 38 hour working week
- \$20 per hour average rate.
- The average number of employee hours that would need to be reduced on a weekly basis is based on the information gained from the Clubs who participated in the survey.

10% revenue reduction:

Clubs with less than 50 EGMs would lose on average 20.77 employee hours per week, per club. On an annualised basis this would be 1080 employee hours lost per club, and based on an average rate of pay of \$20 per hour would mean lost wages of \$21,601 p.a. per Club.

When calculating the impact across all 4 categories of Clubs (from small to large clubs) the total loss of employee wages for all QLD RSL clubs is estimated at \$8.4Million, which represents fulltime equivalent (FTE) staff losses of 213. (This calculation is based on the total estimated 94 RSL Clubs in Queensland).

20% revenue reduction

Estimated employee wages lost \$6.7Million and FTE staff losses of 341.

30% revenue reduction

Estimated employee wages lost \$19.5 Million and FTE staff losses of nearly 494 people.

The table below (Figure 2), explains the method of our estimations above:

Figure 2

# EGMs	0-50	51-100	101-200	201-280	TOTAL
Survey responses	13	9	9	4	35
Total Qld RSL Clubs	57	17	12	8	94
Revenue down 10%	0-50	51-100	101-200	201-280	TOTAL
Ave hours reduction/week/per club	21	232	77	255	
Per Club Hours/pa	1080	12087	4004	13260	30431
Per Club Dollars/pa	\$ 21,600.80	\$ 241,737.60	\$ 80,080.00	\$ 265,200.00	\$ 608,618.40
Dollars/pa/all clubs	\$ 1,231,245.60	\$ 4,109,539.20	\$ 960,960.00	\$ 2,121,600.00	\$ 8,423,344.80
FTE staff losses	31	104	24	54	213
TOTAL FOR SURVEY	\$ 280,810.40	\$ 2,175,638.40	\$ 720,720.00	\$ 1,060,800.00	\$ 4,237,968.80
Revenue down 20%	0-50	51-100	101-200	201-280	TOTAL
Ave hours reduction/week/per club	40	292	154	485	971
Per Club Hours/pa	2080	15184	8008	25220	50,492
Per Club Dollars/pa	\$ 41,600.00	\$ 303,680.00	\$ 160,160.00	\$ 504,400.00	\$ 1,009,840.00
Dollars/pa/all clubs	\$ 2,371,200.00	\$ 5,162,560.00	\$ 1,921,920.00	\$ 4,035,200.00	\$ 13,490,880.00
FTE staff losses	60	131	49	102	341
TOTAL FOR SURVEY	\$ 540,800.00	\$ 2,733,120.00	\$ 1,441,440.00	\$ 2,017,600.00	\$ 6,732,960.00
Revenue down 30%	0-50	51-100	101-200	201-280	TOTAL
Ave hours reduction/week/per club	55	416	239	712	1,422
Per Club Hours/pa	2860	21632	12428	37024	73,944
Per Club Dollars/pa	\$ 57,200.00	\$ 432,640.00	\$ 248,560.00	\$ 740,480.00	\$ 1,478,880.00
Dollars/pa/all clubs	\$ 3,260,400.00	\$ 7,354,880.00	\$ 2,982,720.00	\$ 5,923,840.00	\$ 19,521,840.00
FTE staff losses	83	186	75	150	494

TOTAL FOR SURVEY	\$ 743,600.00	\$ 3,893,760.00	\$ 2,237,040.00	\$ 2,961,920.00	\$ 9,836,320.00
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While there is a potential loss of approximately 500 FTE employees at a 30% revenue reduction level, the actual number of employees impacted will be significantly more.

The reasons for this are:

- It should be noted that 72% of employees in Queensland RSL clubs are either part time or casual. So the number of employees impacted will be significantly more than the FTE's detailed above. As a result one could expect that the number of employees that could potentially lose their jobs would be at least three to four times the FTE numbers.
- The above data assumes that the club remains viable (see below). A concerning outcome of the survey is that a number of clubs indicated that they would not be viable should revenue reductions occur to the various thresholds detailed above. The survey indicated that even a small revenue reduction of 10 % would threaten the financial viability of 26% of Qld RSL clubs

Should a club fail then the entire workforce of the club would lose their job and the additional redundancies would need to be added to the above statistics which would significantly increase the number of employees impacted. The impact on a 30% reduction in revenue is frightening.

- It should also be emphasised that the above results do not consider the multiplier effect of the flow on to suppliers to the industry.

As a result should a worst case scenario occur (ie a reduction in revenue of 30%) it is not unrealistic to expect that the number of employees that would lose their jobs in Queensland RSL clubs would be significant and if added to the remainder of the club & hotel industry in the state and the suppliers to the industry the outcome is of grave concern.

In the past many "prohibition supporters" have clearly stated that a change in regulation will improve the trading of the club when in fact

the opposite occurred. For example when the government introduced the smoking bans many "prohibitionists" supporting the smoking bans highlighted the fact that club revenue should increase as many people do not visit clubs because of smoking. This unfounded assumption clearly was proven to be incorrect and many jobs were lost in the industry with virtually all clubs experiencing reductions in revenue.

We would maintain that we know our members and guests better than anyone and we were well aware of how they will react to restrictions on their **liberty and right of choice**. As such we are clearly concerned that mandatory pre-commitment is not an **anti problem gaming solution** but an **anti gambling imposition** that will impact on the recreational gambler.

As a result the potential impact on the industry and the impact on employment in Queensland is a major concern; the potential loss of jobs in the Queensland RSL club sector alone, warrants the Government to conduct a proper cost/benefit analysis on mandatory pre-commitment, **as was recommended by the Productivity Commission.**

Aegrescit medendo – Latin Phrase – "The disease becomes worse for the remedies employed."

It is worth mentioning that the club industry employs a cross section of unskilled, semi skilled and skilled workers. Employment opportunities for unskilled and semi skilled workers have diminished considerably across all industries with the advent of technology. As it can be expected that many other establishments providing gaming facilities are similarly impacted, the increase in unemployment will be significant and the job opportunities will be minimal in the clubs and hotels sector. Consideration needs to be given to what impact that will have on the people who have no job and by extension, their families. It is a known fact that there is a strong correlation between the much higher incidence of suicide or attempted suicide amongst the unemployed. Other adverse health impacts are also well documented.

In attempting to solve one problem we may end up creating a much greater problem.

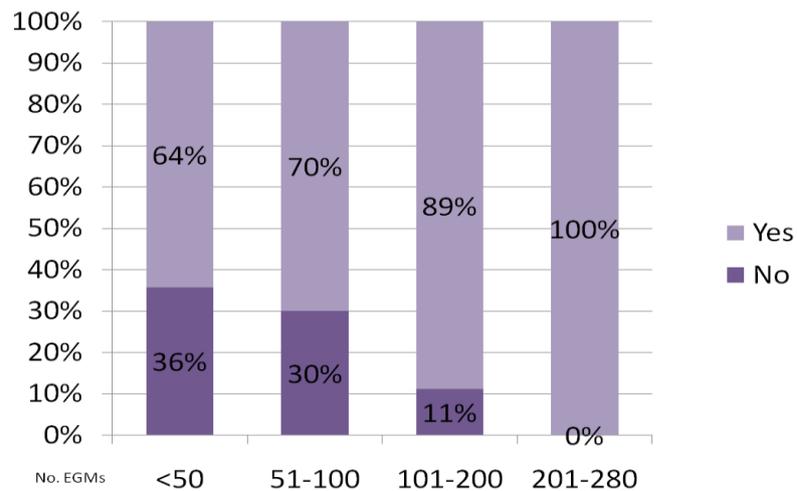
RSL Activities

As mentioned earlier in this submission, approximately sixty percent of RSL clubs pay rent to their RSL sub branches which use this money to service loans for expenditure on improvements to the property and to pursue the objects of the RSL. The sub branches, through their volunteers, provide assistance to veterans in regard to welfare, families in difficulty, attending funerals, assisting

the elderly with household repairs, gardening and the like and assisting ex-service personnel to access pension or health benefits. Most clubs that own their property still provide significant funding to their sub branches and although the survey did not address this point, anecdotally, even those clubs will have to reduce their sub branch funding.

According to our survey, 76% of clubs surveyed indicated that their loan repayments would be jeopardised if revenue fell by more than 10% (Figure 3).

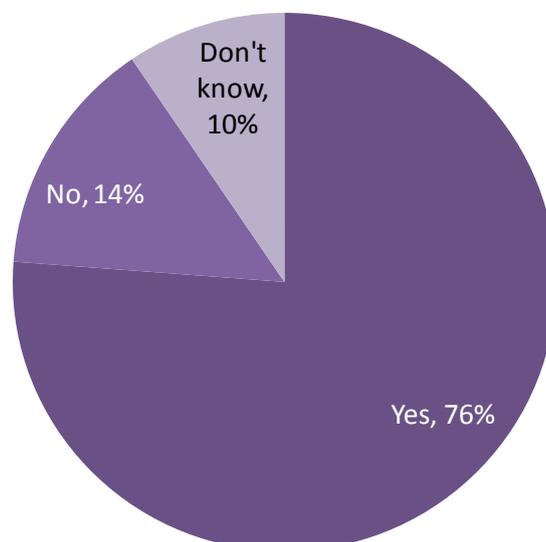
Figure 3



Q. If gaming revenue falls by more than 10%, will this jeopardise your Club's ability to make repayments for re-development or renovation programs?

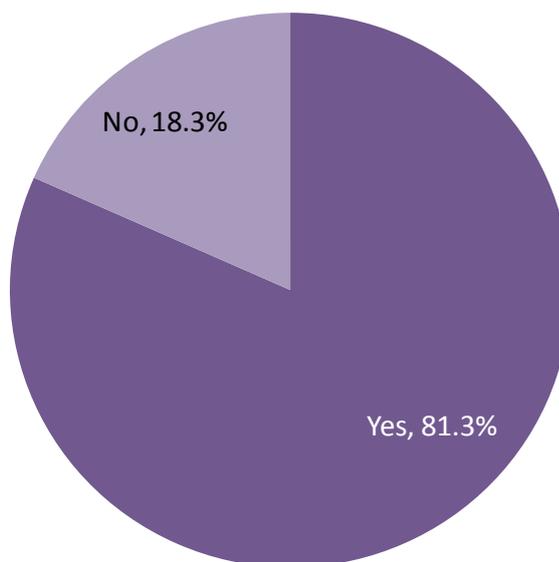
The same percentage said they would have to renegotiate their rent with the sub branch if revenue fell by 10%. (Figure 4).

Figure 4



Furthermore, 81.3% of clubs surveyed indicated that any reduction in rent would have a significant impact on their sub branch's ability to pursue their objects in the provision of welfare services and in some cases, could impact on their ability to service loans (Figure 5).

Figure 5



Examples provided by Clubs of the types of Sub-Branch activities affected are as follows:

"Reduced welfare commitments and reduction in home and hospital visits"

"Any reduction would curtail the expansion of Pension and Welfare Services plus support the for the Day Club (for house bound members etc)"

"Reduce pension and advocacy services to veterans and serving members"

"Veteran support centre activities would also need to be scaled back, including paid personnel and travel allowance paid to volunteers"

"Charity/Welfare work, visits to hospitals/homes/nursing homes, running of Anzac Day"

The ramifications of even a 10% reduction in revenue are extremely serious.

Impacts on the Elderly and on the Entertainment Industry

RSL clubs are renowned for providing safe, welcoming environments to the aged community. They are places where the older members of the community can congregate, meet up with friends, enjoy a cup of coffee (often at no cost) or an affordable meal (maybe the only meal of the day). These clubs also provide entertainment in the form of live music, line dancing, pool, darts and other activities. Some elderly members will enjoy a flutter on the TAB or put a few dollars through the pokies. A visit to their local club often represents the only form of entertainment they may have in a given week. Many clubs provide free door to door transport via their courtesy buses. This is a great service to people who would otherwise be housebound.

The entertainment provided is paid for by the club and provides employment to a wide range of Queensland entertainers.

Most RSL clubs operate on a fine margin of profitability. Consequently, even a relatively small reduction in revenue will have significant consequences. At the rate of decline in revenue that has been predicted, it will have catastrophic impacts on clubs and certainly will put free entertainment, free buses and affordable meals in jeopardy. If revenue losses are to the extent predicted, there will be numerous club closures.

If these services are lost to the community, will the Government make up the short fall? We know that they will not. These are the types of considerations that need to be taken into account in a cost benefit analysis.

Community & Sporting Groups and Charities

RSL & Services Clubs main focus is in supporting the RSL movement. However, they also support many charitable, sporting and community groups in their local communities.

The clubs surveyed by Lawler have revealed that over the past year they have donated in cash and in kind a total of \$5.6m to their local communities. We have chosen not to extrapolate the overall RSL & Services Clubs donations because of the differences in the levels of donations across the different sized clubs and even amongst clubs of similar size. Suffice to say, the survey revealed that 88% of clubs surveyed indicated that a 10% reduction in gaming revenue would adversely impact on their community donations.

It is obvious that if RSL clubs lose significant revenue, other community, sporting and charity groups will also be adversely impacted. Again the question arises - who will make up the shortfall?

Comments from the survey related to the effect upon the community as follows:

"Obviously in these uncertain times any sort of change regarding gaming could have an adverse effect on our businesses and other clubs ability to service their debts and continue to support the community not only in local employment but also in community donations."

"Our club donates a lot back to the community both in sporting, local events and charities, being a small town who will then fund these? Local and federal government don't now so I assume they will not start. Our town will struggle to raise the kind of money our club puts in the local community."

Building Works

RSL & Services clubs are keen to keep their premises in good order and are proactive in improving their facilities for the enjoyment of members and the broader community.

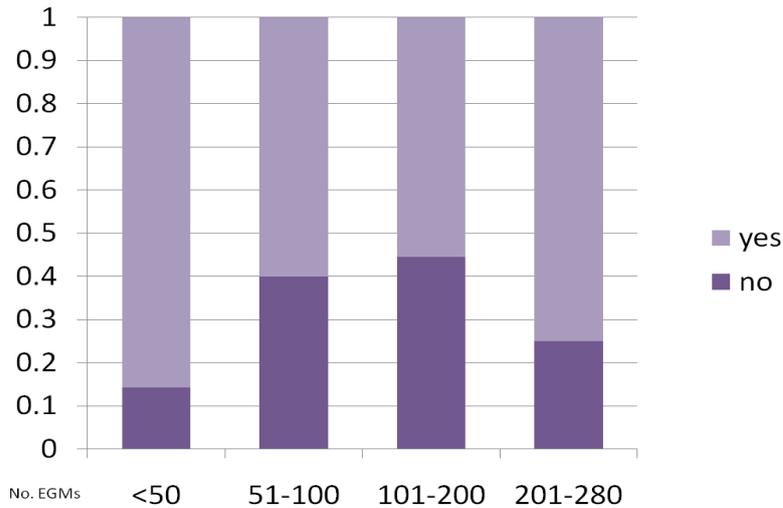
As a consequence, they are often undergoing renovations. It is a known fact that in periods of economic downturn, clubs have often provided much needed work for the building industry.

It is recognised that keeping up to date with new trends is essential to maintaining or improving a club's financial performance.

Since the introduction of gaming machines in 1992, clubs in Queensland have been transformed providing great community facilities, including improved dining, bar and function facilities. They are places where members are proud to visit "my local RSL club". RSL clubs of old were generally rundown, non air conditioned and drab! Compare that to the clubs of today. There is no comparison!

The Lawler's survey has revealed that 76% of clubs indicated that their ability to service loans for renovations would be impacted if the downturn was 10% or greater and 71% of clubs surveyed indicated that they had already put renovation plans on hold until there is some greater revenue certainty (Figure 6).

Figure 6



Q. Has your Club placed redevelopment or renovation plans on hold pending greater revenue certainty?

"A reduction of any amount in income would definitely affect our ability to service debts, maintain employment levels and have a negative impact on our contributions to the local community. It would also impact our future plans"

RSL Club Viability

Alarm bells should be ringing! It is no exaggeration to say that the viability of a whole industry may be at stake. It is a unique industry. Nowhere in the world do we have not for profit clubs of the nature we have in Australia.

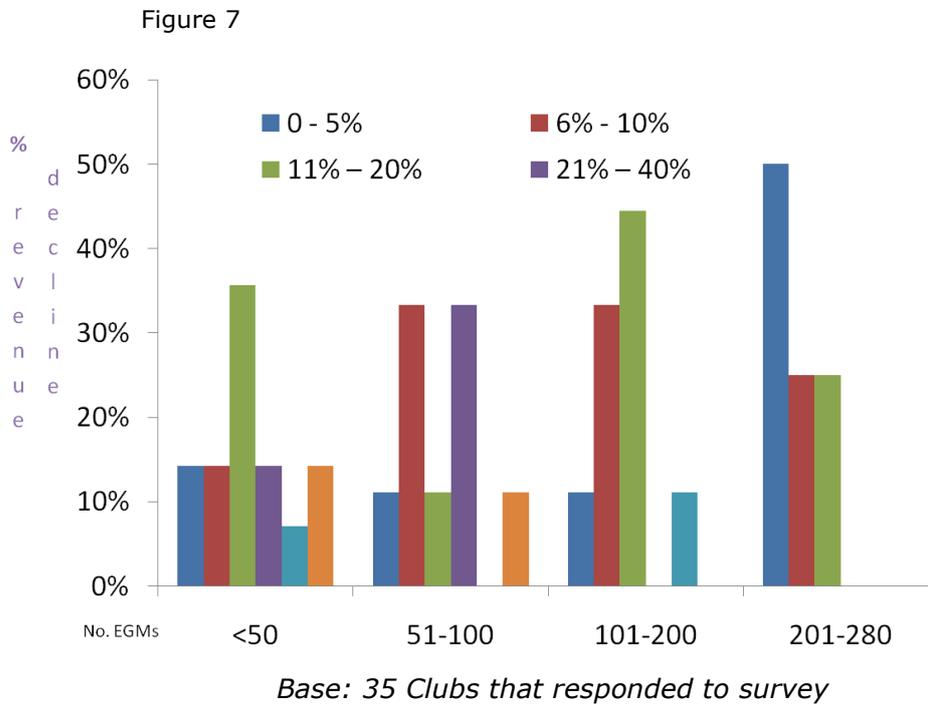
Other countries have social clubs, country clubs, golf clubs etc. Many are privately owned and exclusive – out of the reach of the average consumer.

Not for profit clubs in Australia provide world class facilities at affordable cost. They allow families, the young, the elderly, the disabled – everyone who wants to belong – community facilities that are the envy of the world!

It is not surprising that some in the Australian community, after being bombarded by the media and others about the perceived evils of poker machines, favour mandatory pre-commitment. However, if these same people find that they cannot afford to pay their children’s sporting affiliation fees, or lose their local RSL club, or have no affordable venue to have a meal or a drink with their mates, or find that their child, mother, father or other close friend or relative no longer has a job, that may give them some cause for concern and to question the cost/benefit of such a measure.

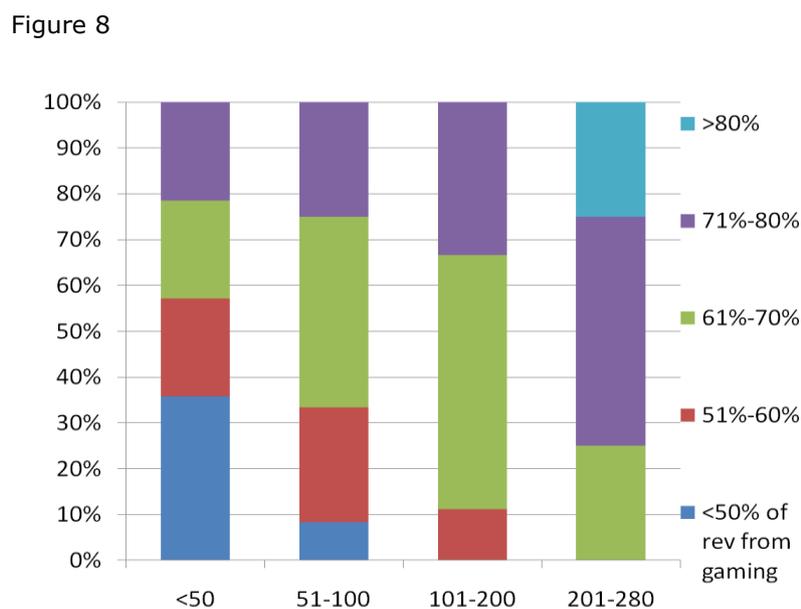
As mentioned previously, most RSL clubs run very marginal businesses. As evidenced by the Lawler’s survey, even a very moderate reduction (up to 10%)

in revenue will threaten the viability of 26% of clubs that responded to the survey (Figure 7).



"We are struggling at the moment to meet our loan repayments and any decrease in profits would make it extremely difficult to service those debts."

According to the Lawler survey, there is a varying level of club revenue attributable to gaming. In large clubs (201-280 machines), 75% reported that revenue from gaming was at 70% or higher (Figure 8).



In reading transcripts from the Committee's recent hearings in regard to the possible need for biometric solutions including eye recognition or finger prints should give cause for concern to all members of the Australian community. This would be a gross invasion of privacy and likely cause embarrassment and ridicule to the Government. The Australian community should be outraged by the suggestion that to be able to play a gaming machine in Australia, which is a lawful activity, a person will not only have to provide their personal details, but possibly have their fingerprints taken or as has been suggested, have a third party determine another individual's level of expenditure on gaming machines. If this becomes reality, it will send shock waves throughout the community.

The Australian community will not tolerate a Nanny State and this is where we seem to be heading.

In regard to problem gambling, we should be empowering people to take control of their lives and to take responsibility for their actions. **Voluntary pre-commitment will offer that option.**

Limits on ATM withdrawals

Many RSL & Services Clubs provide ATM facilities in their clubs. It is a service they provide to their members and guests. Often clubs, unlike many hotels, are situated in areas that are remote from town centres where alternative ATM facilities are located. Many club patrons enter the club for the sole purpose of withdrawing cash for other purposes. Clubs provide a safe environment for making cash withdrawals and we are unaware of any robberies that have taken place from people using ATM machines in clubs. We understand that there are some places where the club ATM is the only ATM for many kilometres, especially in more regional and remote areas of Queensland.

All banks already impose a default limit for daily withdrawals. Reducing withdrawals to \$250 will grossly inconvenience club members.

Most people have multiple accounts with different banks and hold multiple ATM cards. Consequently, any limits will be of no consequence as multiple accounts will be accessed and any limit effectively circumvented.

The RSL & Services Clubs Association strongly oppose such a measure.

Harm Minimisation

Clubs in Queensland have been proactive in following the Responsible Gambling Code of Practice, many going beyond the basic requirements. One RSL club funds a counselling service (\$30,000 per annum). Every Wednesday, the counselling service visits the club and conducts a group meeting (along the lines

of an AA meeting). On Fridays, two counsellors come to the club for individual meetings. On Fridays, ninety-five percent of attendees come to discuss problems other than gambling, eg financial problems, relationship breakdowns, family issues etc.

Responsible Service of Gambling training is mandatory in all Queensland gaming venues. That training now includes signs to look out for in identifying problem gamblers and how to monitor such patrons and what actions should be employed to assist such persons.

Summary

In summary, the Association makes the following points:

- The RSL & Services Clubs Association of Queensland strongly opposes the introduction of a **mandatory** pre-commitment scheme.
- The RSL & Services Clubs Association of Queensland supports the trialling of a **voluntary** pre-commitment scheme.
- The Parliamentary Select Committee on Gambling should recommend to the Government that before the introduction of a mandatory pre-commitment scheme, there should be research undertaken to ascertain whether the proposed system will in fact have the desired outcome of reducing the incidence of problem gambling.
- Before a mandatory pre-commitment scheme is introduced, a cost benefit analysis should be undertaken.
- By all measures, the proposed timeframe for the introduction of a national pre-commitment scheme is completely unrealistic and the Government should follow the Productivity Commission's recommendations in regard to timeframe and the actual implementation (ie a voluntary pre-commitment scheme should be trialled to determine whether a mandatory pre-commitment scheme is justified.)
- Changes to gambling policy should be less subjective and should be evidence based following rigorous research especially in regard to economic impacts.

- This Association believes that the introduction of a mandatory pre-commitment scheme with no evidence based research is likely to seriously interfere with the entertainment value experienced by recreational gamblers, without any proof that problem gamblers will embrace the pre-commitment scheme.
- The playing of gaming machines is a legal activity that should not require players to register before play and also raises a number of issues relating to the Privacy Act.
- RSL Clubs will incur additional costs associated with the introduction and ongoing operation of a mandatory pre-commitment scheme, whilst also incurring an expected significant downturn in revenue associated with the decline in recreational play.
- Problem gamblers will find ways to circumvent the pre-commitment scheme and may turn to other less regulated forms of gambling such as online gambling. As this form of gambling allows for use of credit cards, their financial situation will be further adversely affected.
- Placing a limitation on cash withdrawals from ATMs ignores the fact most people have multiple ATM cards from different banks and therefore such a limitation will be easily circumvented. The Association believes there should be no limit placed on the withdrawals of cash from ATMs located in gaming venues. (The Productivity Commission suggested that any ATM limit could be repealed with the introduction of a mandatory pre-commitment scheme).

Policy driven by political expediency will result in a disastrous outcome for the club and hospitality sector, will greatly inconvenience and impact the enjoyment of gambling by recreational gamblers with no evidence that it will actually lessen harm to people with gambling addictions.

The RSL & Services Clubs Association of Queensland urges the Committee to seriously re-consider the introduction of a mandatory pre-commitment scheme and rather recommend a voluntary scheme which will better target those people who want to control their expenditure on gaming machines.

In closing, we thank the Committee for extending the deadline for submissions to allow this Association to share with you the recently completed industry survey of RSL & Services Clubs in Queensland.

Yours sincerely

Penny Wilson
CEO – RSL&SCA