

Director of Gaming Machines  
Department of Industry, Tourism and Trade | Northern Territory Government  
GPO Box 1154  
Darwin / Northern Territory / 0801  
By email: [DITT.LRASComplianceDWN@nt.gov.au](mailto:DITT.LRASComplianceDWN@nt.gov.au)

August 8, 2022

## OBJECTION TO THE APPLICATIONS BY THE IRIS GROUP FOR ELECTRONIC GAMING MACHINES IN ALICE SPRINGS (GAP VIEW, TODD TAVERN, DIPLOMAT AND MERCURE)

To the Director of Gaming Machines,

The Central Australian Aboriginal Congress wishes to express our **objection** to the applications made by the Iris Group to increase the number of electronic gaming machines ('poker machines') in Alice Springs by an additional 60 poker machines spread between the following venues:

- Todd Tavern (Iris Todd Operations Pty Ltd) – additional 10 poker machines;
- Gap View Hotel (Iris Gapview Operations Pty Ltd) – additional 10 poker machines;
- Uncles Tavern (Iris Diplomat Operations Pty Ltd) – 20 new poker machines; and
- Mercure Resort (Iris Stott Terrace Operations Pty Ltd) – 20 new poker machines.

The reasons for our objection are summarised below:

1. Alice Springs already has three times the national average of poker machines per person
2. There is a higher prevalence of problem gambling in Alice Springs compared with elsewhere in the NT
3. Gambling-related harms are more likely to impact individuals and their families in Alice Springs who are already vulnerable to social, economic, developmental and psychological stressors
4. The NT already has the lowest rates of gambling help-seeking behaviours compared with the rest of Australia
5. Inadequate consultation process lacking transparency, and failure to demonstrate support
6. Alice Springs community experiences substantially higher rates of crime, including domestic violence

### About Central Australian Aboriginal Congress

Congress is a large Aboriginal community controlled health services based in Mparntwe Alice Springs. Established almost 50 years ago, Congress is one of the most experienced organisations in the country in Aboriginal health, a national leader in primary health care (PHC), and a strong advocate for the health of our people. Congress delivers services to more than 16,000 Aboriginal people living in Alice Springs and remote communities across Central Australia including Ltyentye Apurte (Santa Teresa), Ntaria (Hermannsburg), Wallace Rockhole, Utju (Areyonga), Mutitjulu and Amoonguna.

Congress' 50-year history is grounded in advocacy in being a voice for the Aboriginal community of Alice Springs and Central Australia. In 2011, the Aboriginal community-elected Congress Board of Directors of formally adopted the position that Congress would oppose the introduction of all new poker machines in Alice

Springs. This decision was formed on the basis that there is a direct correlation between the number of poker machines with gambling-related harm.

### 1. Alice Springs already has three times the national average of poker machines per person

Nationally, it is estimated that there is **one poker machine for roughly every 110 to 114 adults**<sup>1,2</sup>. This places Australia as having more poker machines per person than any country in the world, excluding Macao and Monaco. This in itself is cause enough for concern.

However the rate of persons per poker machine in Alice Springs is already three times the national rate, with current numbers of poker machines in Alice Springs (n=510) producing a rate of **one poker machine per 37 adults** (based on an estimated adult population of 19,021<sup>3</sup>). An additional 60 poker machines (n=570) would mean that Alice Springs would be more than three times worse than the Australian average, with **one poker machine per 33 adults**.

This is both unnecessary and unacceptable.

### 2. There is a higher prevalence of problem gambling in Alice Springs compared with elsewhere in the NT

The Northern Territory has higher rates of gambling-related harm than other Australian jurisdictions,<sup>4</sup> with the highest estimates for all risk levels of problem gambling as measured by the Problem Gambling Severity Index (PGSI).<sup>5</sup>

In addition, it is estimated that almost a quarter (23%) of gamblers in Alice Springs are classified as at risk, compared with one-fifth (20%) for the NT overall.<sup>6</sup>

The *Northern Territory Gambling Prevalence and Wellbeing Survey Report, 2018* found that Alice Springs residents were the most likely in the NT to gamble on five or more activities, which is indicative of the greater level of accessibility of gambling options available here in Alice Springs.

Furthermore, this report found that Alice Springs residents recorded the greatest use of poker machines than residents of other NT regions, at 24.1% compared with the next highest being Darwin at 19.6%.<sup>7</sup> In its 2010 review of gambling, the Productivity Commission concluded that poker machines are the most dangerous form of gambling and are responsible for the vast majority of problem gamblers.<sup>8</sup>

Gamblers in Alice Springs were also found to be more likely to access an ATM two or more times in a gambling session, at 53.4% for Alice Springs compared with 28.1% in Darwin and 36.5% overall for the NT.<sup>9</sup>

---

<sup>1</sup> Georgatos, G (2019). *18 percent of world's pokies in Australia*, The Stringer, August 10th, 2019. Accessed from: <https://thestringer.com.au/18-percent-of-worlds-pokies-in-australia-12975#.Yuh8DnZByUK>

<sup>2</sup> Young, M and Markham, F (2017). *Three charts on: Australia's addiction to poker machines*, The Conversation. June 27th, 2017. Accessed from: <https://theconversation.com/three-charts-on-australias-addiction-to-poker-machines-78353#:~:text=Republish%20our%20articles%20for%20free,under%20a%20Creative%20Commons%20license.&text=Australia%20has%20more%20poker%20machines,one%20for%20every%20114%20people>

<sup>3</sup> Australian Bureau of Statistics (August 2022). *Alice Springs: 2021 Census All persons QuickStats* [https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA70200], ABS Website, accessed 04 August 2022.

<sup>4</sup> Gupta, H and Stevens, M (2021). "It started 30 years ago, and it still haunts me": an exploratory investigation of Territorians' gambling behaviours, harm, and help-seeking for gambling issues in an Australian jurisdiction'. *BMC Public Health* 21, 96 (2021). <https://doi.org/10.1186/s12889-020-10141-5>.

<sup>5</sup> Stevens, M, Gupta, H and Flack, M (2019). *Northern Territory Gambling Prevalence and Wellbeing Survey Report, 2018*. Darwin: Menzies School of Health Research and the Northern Territory Government. Accessed from: [https://industry.nt.gov.au/\\_data/assets/pdf\\_file/0010/959176/2018-nt-gambling-prevalence-wellbeing-survey.pdf](https://industry.nt.gov.au/_data/assets/pdf_file/0010/959176/2018-nt-gambling-prevalence-wellbeing-survey.pdf)

<sup>6</sup> Stevens et al (2019), Ibid.

<sup>7</sup> Stevens et al (2019), Ibid. <https://www.pnas.org/doi/10.1073/pnas.1010076108>

<sup>8</sup> Productivity Commission 2010, *Gambling*, Report no. 50, Canberra.

<sup>9</sup> Stevens et al (2019), Ibid.



This clearly demonstrates that additional poker machines in Alice Springs will only serve to further exacerbate a problem that is already far greater across a range of domains than elsewhere in the NT, including Darwin.

### **3. Gambling-related harms are more likely to impact individuals and their families in Alice Springs who are already vulnerable to social, economic, developmental and psychological stressors**

Many families in Alice Springs already face significant, multi-faceted and complex stressors in their everyday lives. For Aboriginal people in Alice Springs, there are a range of risk factors that could lead to an increased susceptibility to developing problem gambling issues, which include traumatic early childhood, unemployment, drug and alcohol use and social exclusion.<sup>10</sup>

The *Northern Territory Gambling Prevalence and Wellbeing Survey Report, 2018* found that Aboriginal people were more likely to be at risk of problem gambling (34.2%) than non-Indigenous gamblers (15.7%). Poker machines are significantly associated with high spend activity and problem gambling risk. Poker machines are also significantly associated with harm from gambling for at-risk gamblers, with 54.7% of at-risk gamblers using poker machines experiencing one of more harms.<sup>11</sup>

Problem gambling also causes harm for the people around the individual who participates in gambling activity. Gambling exacerbates stressors for individuals and families. These stressors include issues with money/finance, poverty, running out of money for food, placing or increasing pressure on relationships, and impacts on mental health, including feelings of stress, anxiety, depression and shame.<sup>12</sup>

In Australia, income and wealth are not distributed evenly and on average, Aboriginal and Torres Strait Islander people receive a personal income that is only two-thirds that of the non-Indigenous population.<sup>13</sup> This situation is considerably worse in Central Australia where both absolute poverty and relative inequality are worsening;<sup>14</sup> the median weekly personal income for Aboriginal people is barely more than a quarter of that of non-Indigenous people in the region.<sup>15</sup> Adding more poker machines to a town where there is already considerable socioeconomic inequality will only contribute further to the problem.

Children growing up in Alice Springs are already more likely than other Australian children to be developmentally vulnerable on one or more and two or more domains, as reported by the Australian Early Development Census. The latest data from 2021<sup>16</sup> shows that 33.3% of children in Alice Springs are developmentally vulnerable on one domain, compared with 22% of Australian children. For two or more domains, Alice Springs children are twice as likely (20.6%) than other Australian children (11.4%) to be developmentally vulnerable.

The unequal burden of problem gambling in our region is therefore not only due to the higher levels of access to electronic gaming machines but it also due to higher levels of population risk to the development of gambling addiction due to the greater impact of intergenerational trauma and other adverse early childhood events revealed in the Australian Early Development Census Scores for children in our region. It has been well described, especially in the Dunedin longitudinal study, that children who lack normal levels of self-control at age four are much more susceptible to the development of addictions in later life and there are a disproportionate number of children in our region in this category.<sup>17</sup>

---

<sup>10</sup> MacLean S et al. (2019). 'Gambling in Two Regional Australian Aboriginal Communities: A Social Practice Analysis'. *Journal of Gambling Studies*. *J Gambl Stud* 35, 1331–1345. <https://doi.org/10.1007/s10899-019-09858-9>

<sup>11</sup> Stevens et al (2019), *Ibid*.

<sup>12</sup> Stevens et al (2019), *Ibid*.

<sup>13</sup> Australian Bureau of Statistics (ABS) (2017) *Census 2016: what's changed for Indigenous Australians?*; Available from: <https://theconversation.com/census-2016- whats-changed-for-indigenoustralian-79836>.

<sup>14</sup> Markham F and Biddle N (2018). *Income, poverty and inequality*. Centre for Aboriginal Economic Policy Research, Canberra.

<sup>15</sup> Australian Bureau of Statistics (ABS) (2016). *2016 Census Community Profiles*. Available from: [http://quickstats.censusdata.abs.gov.au/census\\_services/getproduct/census/2016/communityprofile/7?opendocument](http://quickstats.censusdata.abs.gov.au/census_services/getproduct/census/2016/communityprofile/7?opendocument).

<sup>16</sup> Australian Early Development Census, 2021 Data Explorer. Accessed 5/08/22 from: <https://www.aedc.gov.au/data-explorer/?id=181853>

<sup>17</sup> Terrie E. Moffitt, Louise Arseneault, Daniel Belsky, Nigel Dickson, Robert J. Hancox, HonaLee Harrington, Renate Houts, Richie Poulton, Brent W. Roberts, Stephen Rossa, Malcolm R. Searse, W. Murray Thomson, and Avshalom Caspi, *A gradient of childhood self-control predicts health, wealth, and public safety*



**Increasing the number of poker machines in a town where too many children and families are already struggling is unacceptable.** There is an additional imperative to protect our more at risk community from gambling addiction rather than supersaturate an at risk population with the most addictive form of gambling – electronic gaming machines.

#### **4. The NT already has the lowest rates of gambling help-seeking behaviours compared with the rest of Australia**

Literature shows that help seeking behaviour within Aboriginal communities for at risk/problem gambling is low, and this is often due to a number of factors, including lack of awareness within the community as to the true extent of the issue, shame and stigma attached to seeking assistance, and lack of culturally appropriate services to provide support.<sup>18</sup>

This is supported by the *Northern Territory Gambling Prevalence and Wellbeing Survey Report, 2018* which found a very low prevalence of help seeking behaviour amongst monthly poker machine gamblers, regular gamblers and at-risk gamblers, with only 1.5% of people in these categories seeking help.<sup>19</sup>

#### **5. Inadequate consultation process lacking transparency, and failure to demonstrate support**

Under the *Guidelines for preparing a community impact analysis* set out by the Northern Territory Government,<sup>20</sup> applicants are required to demonstrate 'evidence of community attitudes towards the proposal, gained from direct discussions with a range of community representatives' which are expected to include health care providers, among other key stakeholders.

As the largest Aboriginal community controlled health service (ACCHS) in the Northern Territory and the major provider for Aboriginal health in Central Australia, Congress firstly would have expected to be consulted for each of the four applications in question, and secondly that other key Aboriginal community controlled organisations would have been included in the consultation process. Congress was only consulted as part of the Community Impact Analysis for Uncles Tavern, and not for the CIAs for the other three applications (Gapview, Todd Tavern, Mercure).

Congress is not aware of any public consultation sessions that have been held as part of these application processes. The 'targeted' consultation process outlined in the four CIAs show that the applicants clearly do not understand the make-up and dynamics of the local community.

Notably, the consultation process excluded key, relevant Aboriginal community controlled organisations such as Tangentyere Council Aboriginal Corporation, Lhere Artepe Aboriginal Corporation and the Central Land Council which collectively represent the interests of Aboriginal people across Alice Springs and Central Australia.

Notwithstanding the poor attempt to engage genuinely with the community, it is unsurprising that **none** of the responses to the survey as included in each of the four CIAs supported the applications for additional poker machines in Alice Springs.

---

<sup>18</sup> Cultural & Indigenous Research Centre Australia. *Development of culturally appropriate problem gambling services for Indigenous communities*. Occasional Paper No. 40

<sup>19</sup> Stevens et al (2019), *ibid*.

<sup>20</sup> Northern Territory Government, *Guidelines for preparing a community impact analysis*. NT.GOV.AU, accessed 4/08/22 from <https://nt.gov.au/industry/gambling/licences/gaming-machines-in-clubs-pubs/prepare-community-impact-analysis/guidelines-to-prepare-a-community-impact-analysis-for-gaming-machine-applications>

## 6. Alice Springs community experiences substantially higher rates of crime, including domestic violence

Congress does not support the addition of poker machines in Alice Springs at any point in time. Regardless of this, this particular point in time is a particularly bad time to be considering adding extra poker machines to the mix in a town where there is already escalating rates of domestic and family violence, changes in legislation that have increased access to alcohol across the NT,<sup>21</sup> and uncertainty in changes to income management.

Alice Springs has recorded significant increases across almost all types of crime, including domestic violence which has increased by more than 15% for the period 01/06/2021 to 31/05/2022.<sup>22</sup> Further, domestic violence related assaults occur in Alice Springs at more than twice the rate than the overall NT rate.<sup>23</sup> Aboriginal women are disproportionately represented in domestic violence statistics. Studies have shown that the correlation between poker machine density and domestic violence is statistically significant;<sup>24</sup> we know that Alice Springs has both unacceptably high rates of domestic violence and more poker machines per person than the rest of Australia so **the link between DV and gambling cannot be underestimated.**

In recognition of the negative impact of gambling on our families and community in Alice Springs, Congress has recently established a project within our Health Promotions unit aimed at ameliorating gambling-related harms. An increase in access to poker machines will counteract any gains we may achieve to the detriment of our community.

For further information regarding any of the points raised in this letter please contact Dr John Boffa, Chief Medical Officer Public Health on [john.boffa@caac.org.au](mailto:john.boffa@caac.org.au).

We urge you to consider these points and strongly object to the applications made by Iris Capital to increase the number of poker machines in Alice Springs.

Sincerely,

Dr Donna Ah Chee  
Chief Executive Officer

---

<sup>21</sup> Northern Territory Government, *Changes to alcohol restrictions in NT communities*. Accessed 5/08/22 from <https://nt.gov.au/law/alcohol/bans-and-dry-areas/changes-to-alcohol-restrictions-in-nt-communities#:~:text=On%2017%20July%202022%2C%20the,no%20longer%20have%20alcohol%20restrictions.>

<sup>22</sup> NT Police, Fire & Emergency Services, *Alice Springs Crime Statistics*. Accessed 5/8/22 from <https://pfes.nt.gov.au/police/community-safety/nt-crime-statistics/alice-springs>

<sup>23</sup> NT Police, Fire & Emergency Services. Ibid.

<sup>24</sup> Markham F, Doran B, Young M (2016). 'The relationship between electronic gaming machine accessibility and police-recorded domestic violence: A spatio-temporal analysis of 654 postcodes in Victoria, Australia, 2005–2014'. *Social Science & Medicine*, Vol 162. <https://doi.org/10.1016/j.socscimed.2016.06.008>.

