

Making a submission

Your feedback

The Ministry of Health (the Ministry) welcomes your thoughts and feedback on this draft strategy, which outlines the proposed strategic direction and services to prevent and minimise gambling harm, and the associated gambling levy rates, to apply from 1 July 2025 to 30 June 2028.

Your feedback is vital to help us develop the final strategy.

How to provide feedback

You can provide feedback by:

- making an online submission at <https://consult.health.govt.nz>
- filling in this form and emailing it to gamblingharm@health.govt.nz
- attending a consultation meeting (meeting details will be made available at <https://consult.health.govt.nz>).
- emailing your thoughts to gamblingharm@health.govt.nz.

Closing date for submissions

The Ministry must receive your submission by 5pm on **6 October 2024**. Any submissions received after this due date may not be included in the analysis of submissions, even if they were posted earlier. You might prefer to email your submission to ensure that the Ministry receives it on time.

Information about the person/organisation providing feedback

We encourage you to fill in this section. The information you provide will help us analyse your feedback. However, your submission will still be accepted if you do not fill in this section.

This submission was completed by: *(name)* _____

Address: *(street/box number)* _____

(town/city and postcode) _____

Email: _____

Organisation *(if applicable)*: _____

Position *(if applicable)*: _____

This submission (*tick one box only*):

- is made by an individual or individuals (not on behalf of an organisation nor in their professional capacity)
- is made on behalf of a group or organisation(s).

What ethnic group/s do you belong to? (*you may tick more than one box*)

- Māori
- NZ European/Pakeha
- Samoan
- Tongan
- Niuean
- Cook Islands Māori
- Chinese
- Indian
- European
- Middle Eastern, African, Latin American
- Other (*please specify*) _____

Please indicate which perspectives your submission represents (*you may tick more than one box*):

- | | | | |
|---------------------------------------|--------------------------|----------------------------------|--------------------------|
| Māori | <input type="checkbox"/> | Family/whanau | <input type="checkbox"/> |
| Pacific | <input type="checkbox"/> | Lived experience/Tangata Whaiora | <input type="checkbox"/> |
| Asian | <input type="checkbox"/> | Local government | <input type="checkbox"/> |
| Service provider | <input type="checkbox"/> | Central government | <input type="checkbox"/> |
| Gambling industry (levy payer) | <input type="checkbox"/> | Researcher | <input type="checkbox"/> |
| Children / Young people | <input type="checkbox"/> | Disability | <input type="checkbox"/> |
| Other (<i>please specify</i>) _____ | | | |

Summary of submissions

If you wish to be notified when a summary of submissions is available, please ensure your contact details are provided above and tick the box below.

- I wish to be informed when the summary of submissions is available.

Publishing submissions

We may publish all submissions or a summary of submissions on the Ministry's website, unless you ask us not to include details from your submission.

If you are submitting as an individual, we will automatically remove your personal details and any identifiable information. You can also choose to have your personal details withheld if your submission is requested under the Official Information Act 1982.

Privacy

We may publish all submissions, or a summary of submissions, on the Ministry's website. If you are submitting as an individual, we will automatically remove your personal details and any identifiable information.

If you do not want your submission published on the Ministry's website, please tick this box:

Do not publish this submission.

Your submission may be subject to requests made under the Official Information Act 1982. If you want your personal details removed from your submission, please tick this box:

Remove my personal details from Official Information Act responses.

If your submission contains commercially sensitive information, please tick this box:

This submission contains commercially sensitive information.

Consultation questions

The following questions about the *Strategy to Prevent and Minimise Gambling Harm 2025/26 to 2027/28: Consultation document* (the draft Strategy) are designed to help you prepare your feedback. However, you do not have to answer the questions if you prefer to structure your submission in some other way.

Please include or cite relevant supporting evidence in your submission if you can.

You are also welcome to provide any other feedback on the draft strategy or more generally any ideas on preventing or minimising gambling harm in New Zealand.

Note: The Gambling Act 2003 defines harm, the purpose of the strategy (to prevent and minimise gambling harm) and key components that a strategy must include.

Neither these legislative provisions nor the content of the other strategic documents and frameworks with which the proposed strategy is expected to align are under consideration in this consultation.

Questions on the strategic plan (pages 10-12 and Appendix Four refer)

The following questions relate to the strategic direction, outcomes and associated actions.

1. Do you agree with the proposed strategic goal, outcomes, actions and system priorities?

- Yes
 No. If no, please explain why in the space below.

2. Does the draft strategic plan adequately reflect changes in the gambling environment?

- Yes
 No. If no, what else should be included and why? Please explain in the space below.

3. Do you have any comments to make on the work to support priority populations?

- Yes. Please add any comments in the space below.
 No

Questions on the service plan (pages 13-17 and Appendix Five refer)

The Gambling Act 2003 requires the service plan and, by implication, the indicative budget appropriations to have a focus on public health. **Note: The legislation is not under review.**

The following questions relate to the content of the service plan and indicative budgets.

4. Does the draft service plan adequately cover what it needs to cover, for example, does it include the right types of services and activities?

- Yes
 No. If no, what is not adequately covered and why? Please explain in the space below.

5. Do you consider the proposed funding levels, mix of services and service supports appropriate?

- Yes
 No. If no, what changes should be made and why? Please explain in the space below.

6. Do you agree with the proposed new services and investments?

- Yes
 No. If no, what changes should be made and why? Please explain in the space below.

7. Do you agree with the priorities for research and evaluation that have been outlined in the draft service plan?

- Yes
- No. If no, what changes should be made and why? Please explain in the space below.

Questions on the levy formula and levy rates (pages 18-21 and Appendix Six refer)

Note: The levy formula is prescribed in legislation and is not under consideration in this consultation.

The figures for variables A, B and R are derived from data held by the Ministry, Health New Zealand, Te Tari Taiwhenua | Department of Internal Affairs and Inland Revenue and are a matter of record. The variable C (the funding appropriation proposed for the strategy) is discussed in the service plan and funding questions above.

The following questions relate to the other components of the levy formula.

8. Are the player expenditure forecasts for each gambling sector (D) realistic?

- Yes
- No. If no, please explain why not in the space below.

9. Are there realistic pairs of expenditure/presentation weightings (W1 and W2) other than those discussed in this consultation document?

- Yes. If yes, please explain what and why in the space below.
- No

10. Which pair of weighting options for W1 and W2 do you prefer, if any, and why? Please explain in the space below. Please keep in mind that the levy weighting options only affect the proportion of levy to be paid by each gambling sector and do not affect the total amount of the levy.

11. Do you have any comment on the estimated levy rates for each sector, keeping in mind that the levy formula itself is set in legislation and is not under consideration in this consultation? Please add any comments in the space below.

Anything else?

12. Is there anything else you would like to tell us about the draft strategy or preventing and minimising gambling harm more generally? Please add any comments in the space below.

Additional questions about the future Strategy development process under the Gambling Act 2003

This work is separate to consideration of the draft strategy for 2025/26 to 2027/28, but we are using the same consultation process to seek feedback on questions related to two specific proposals below.

The Ministry of Health is considering whether to progress two minor amendments to section 318 of the Gambling Act 2003 (the Act), designed to reduce duplication and administrative costs of developing the strategy in the future. We are not proposing any changes to section 317 of the Act that provides for a public health focus, or to the purpose and required components of the integrated strategy.

Should the Government decide to proceed, these changes would require legislative amendments introduced for Parliament to consider and there would then be an opportunity for further public comment at Select Committee. We estimate that any changes would be unlikely to come into effect until the strategy cycle starting in July 2028.

Proposal 1

Changing the frequency of revising the strategy costs and levy funding from every three to every five years (moving from the current three-year strategy cycle to a five-year strategy cycle).

This would reduce development overheads so more resources could be spent on services and allow more effective management of service delivery, research, and evaluations. The Act's provisions to adjust for over or under recovery of the levy, or due to significant changes to the gambling environment at any time, would not be changed.

13. Do you agree that the strategy should be developed every five years instead of three?

- Yes
- No

If No, do you have another time period you would recommend? If so, please explain what and why in the space below.

Proposal 2

Simplifying the strategy consultation requirements from two phases to one phase (the Gambling Commission would undertake its role as part of the general consultation phase).

A single consultation phase would remove the need to prepare separate strategy proposals for the Gambling Commission and the time and cost of an additional round of consultation. The strategy development and consultation processes are resource and time intensive and duplicating these steps under the current arrangements effectively takes away funds that could be directed to delivering gambling harm services. The Gambling Commission would still be consulted and could provide a report to responsible Ministers as part of a single consultation phase, but it would not be required to consult separately in addition to the initial consultation as occurs now.

14. Do you agree that the legislation should not require separate strategy proposals and further consultation by the Gambling Commission, but it should allow for the Gambling Commission to give its own view on the proposed funding and problem gambling levy as part of the general consultation phase?

- Yes
- No

If No, do you have any comments on simplifying the existing consultation requirements? Please explain in the space below.

Thank you for your submission.