

02 March 2020

Victorian Commission of Gambling and Liquor  
Regulation  
GPO 1988, Melbourne, Victoria, 3001  
[contact@vcglr.vic.gov.au](mailto:contact@vcglr.vic.gov.au)

To whom it may concern,

**Application to install and operate 60  
electronic gaming machines at  
Mt Atkinson Hotel, McKinley Drive, Truganina, Victoria**

cohealth is concerned about the application by Zahav (Aust) Pty Ltd to install 60 electronic gaming machines at the proposed new Mt Atkinson Hotel.

We recommend that the VCGLR **declines** this application.

cohealth is one of Australia's largest not-for-profit community health services, operating across nine local government areas in Victoria, including the City of Melton. Our mission is to improve health and wellbeing for all, and to tackle inequality in partnership with people and the communities they live in.

cohealth provides integrated medical, dental, allied health, mental health and community support services, and delivers programs to promote community health and wellbeing. Our service delivery model prioritises people who experience social disadvantage and are consequently marginalised from many mainstream health and other services – such as people who are experiencing homelessness or mental illness, Aboriginal and Torres Strait Islanders, refugees and asylum seekers, people who use alcohol and other drugs, recently released prisoners and LGBTIQ communities.

cohealth provides a number of services within the City of Melton:

- Mental health programs co-located at Melton Health and Community Services where we work collaboratively with allied health services, alcohol and drug services and clinical mental health providers to provide a holistic model of care.
- The Mobile Health Access Point - a mobile health clinic for people aged 12-25 with outreach locations including in the City of Melton. It provides access for alcohol and other drug, health and social support needs.
- A Victims Assistance Program worker is co-located at Melton police station.

Our health, social support and counselling services regularly see people who have experienced the harmful impacts of problematic gambling, particularly from electronic gaming machines. The financial losses incurred from using pokies place household

finances under significant strain. We see the detrimental effect this has on the mental and physical health of individuals, their families and children as well as on their engagement with community and employment.

Given that income is a key social determinant of health these health impacts are to be expected. The link between poverty and health is clear, with people with lower incomes experiencing worse health outcomes than those with higher incomes. Financial losses from gambling exacerbate this inequity and place the health and wellbeing of individuals and families at further risk.

cohealth is concerned that increasing the number of poker machines within the City of Melton area has the potential to increase the harm on people in the area. While the future socio-economic profile of the Mt Atkinson development area is unclear, it is reasonable to anticipate that many residents will have substantial mortgages, relative to income, with the potential to lead to mortgage stress. Housing stress is experienced by 12.9 per cent of households in Melton, and is already higher than the Victorian average of 11.4 per cent of households.<sup>1</sup> Combined with commuting costs and pressures, and limited local services, facilities and social spaces, at least in the early stages of the development, the possibility of gambling harm increases.<sup>2</sup>

Research is unequivocal about the harms caused by gambling. I draw your attention to the work of the Responsible Gambling Foundation, specifically *Assessing gambling-related harm in Victoria: a public health perspective*.<sup>3</sup>

Key findings from this research include that:

- Gambling causes widespread, significant direct and indirect harm to individuals and non-gamblers, particularly through electronic gaming machines
- The harms to Victorians are large and diverse, including; violence, relationship breakdown, family breakdown, lack of essential items for children, social exclusion of children, neglect, depression, anxiety, suicide, fraud, other criminal activity, loss of housing, loss of assets, and intergenerational harms.
- The cumulative harm experienced by Victorians was equivalent in harm to either diabetes or to arthritis.
- At a population level, harm from gambling is very significant – nearly of the same magnitude as harm from alcohol or major depressive conditions.

Research has also demonstrated the link between gambling and family violence, with people who have gambling problems being more likely than people without gambling problems to be victims and perpetrators of family violence.<sup>4</sup> Family violence is three times

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<sup>1</sup> <https://atlas.id.com.au/melton/maps/housing-stress>

<sup>2</sup> The lack of alternative social spaces has been demonstrated to be a contributor to problem gambling <https://aifs.gov.au/agrc/publications/gambling-suburban-australia>

<sup>3</sup> Browne, M, Langham, E, Rawat, V, Greer, N, Li, E, Rose, J, Rockloff, M, Donaldson, P, Thorne, H, Goodwin, B, Bryden, G & Best, T 2016, *Assessing gambling-related harm in Victoria: a public health perspective*, Victorian Responsible Gambling Foundation, Melbourne.

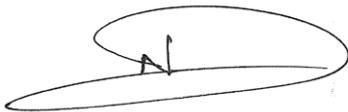
<sup>4</sup> <https://www.whin.org.au/wp-content/uploads/sites/2/2018/01/Family-Violence-and-Gambling-Information-for-Local-Government.pdf>

more likely to occur in families where there is problem gambling than in families in which there are no gambling problems.

Problem gambling exacerbates existing health inequities and further burdens social services. As such, cohealth is concerned that granting a licence for 60 electronic gaming machines at the Mt Atkinson Hotel will have a detrimental impact on the local community, particularly on those already experiencing disadvantage.

**We recommend that the Commission denies this licence application.**

Yours sincerely

A handwritten signature in black ink, appearing to be 'Nicole Bartholomeusz', written over a horizontal line.

Nicole Bartholomeusz  
Chief Executive