

02 March 2021

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 70 electronic gaming machines  
at proposed Club Tarneit, 115 Woods Road, Truganina, Victoria**

cohealth is concerned about the application by Werribee Football Club to install 70 new electronic gaming machines at the proposed new venue Club Tarneit in Tarneit/Truganina.

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

cohealth is one of Victoria's largest not-for-profit community health services, operating across nine local government areas in Victoria, including the City of Wyndham. 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 Wyndham:

- Mental health programs in Werribee, co-located at Victoria University Interprofessional Clinic, 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 Wyndham. It provides access for alcohol and other drug, health and social support needs.
- A Victims Assistance Program worker is co-located at Werribee police station.

- Services provided via outreach in the City of Wyndham, including homelessness, school readiness, family support, family violence and Aboriginal and Torres Strait Islander health program.

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 within the City of Wyndham area has the potential to increase the harm on people in the area. The City of Wyndham already has 903 electronic gaming machines (EGMs) across 13 venues and is ranked 8<sup>th</sup> highest of 70 local government areas for EGM losses in Victoria.<sup>1</sup>

The location of the proposed venue is in close proximity to a retirement village, a main train line and a major shopping precinct. This location may encourage impulsive gambling.

The Social and Economic Impact Statement prepared for the City of Wyndham identified that the location of the proposed venue is in a growth area that will experience rapid population growth in the coming years.<sup>2</sup> It is reasonable to anticipate that many residents will have substantial mortgages, relative to income, with the potential to lead to mortgage stress. Combined with commuting costs and pressures, and limited local services, facilities and social spaces the possibility of gambling harm increases.<sup>3</sup>

The unemployment rate for the City of Wyndham has been above the state average for most of the past decade,<sup>4</sup> and this difference has increased due to the impact of COVID-19. JobSeeker payment data confirms this, showing that by January 2021 the number of recipients has more than doubled in the City of Wyndham compared to March 2020. The increase is even more pronounced in Truganina, where the number of

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<sup>1</sup> <https://responsiblegambling.vic.gov.au/resources/gambling-victoria/pokies-across-victoria/#spent-per-year>

<sup>2</sup> SGS, 2021 Club Tarneit: Social and Economic Impact Assessment for New Gaming Machine Venue. Retrieved 25 Feb 2021 <https://www.wyndham.vic.gov.au/about-council/your-council/council-and-committee-meetings/council-and-committee-meeting-agendas-and>

<sup>3</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>4</sup> <https://economy.id.com.au/wyndham/unemployment>

JobSeeker and Youth Allowance recipients tripled.<sup>5</sup> The financial vulnerability of this community would be exacerbated by the introduction of more EGMs in the area.

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>6</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>7</sup> Family violence is three times more likely to occur in families where there is problem gambling than in families in which there are no gambling problems.

Gambling harm exacerbates existing health inequities and further burdens social services. As such, cohealth is concerned that granting a licence for 70 electronic gaming machines to the Werribee Football Club at the proposed Club Tarneit 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



Jane Stanley  
Advocacy and Policy Manager

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<sup>5</sup> <https://profile.id.com.au/wyndham/job-seeker>

<sup>6</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>7</sup> <https://www.whin.org.au/wp-content/uploads/sites/2/2018/01/Family-Violence-and-Gambling-Information-for-Local-Government.pdf>