**Submission Guide:**

**Gambling (Gambling Harm Reduction) Amendment Bill**

Public submissions are now being invited on the Gambling (Gambling Harm Reduction) Amendment Bill.

The National Sports Organisations Leadership Group (NSO) is encouraging all sports organisations to make a submission and to motivate their constituent clubs to also make a submission on the Bill to the Commerce Committee.

The closing date for submissions is **Thursday, 21 June 2012.**

**What is a submission?**

A submission is the presentation of views or opinions on a matter currently under consideration by a select committee – in this instance, the Gambling (Gambling Harm Reduction) Amendment Bill.

By writing or presenting a submission, you are providing the committee with your own insights, observations and opinions. Giving reasons for any changes to the Bill that you believe should or should not be made, will give validity to your submission.

**How do I make a submission?**

Submissions are made in written form, and they can be reinforced through making an oral presentation if you choose to speak directly to the committee. You may make a written submission by sending it to the committee or online via the parliament website by clicking [here](http://www.parliament.nz/en-NZ/PB/SC/MakeSub/5/0/3/50SCCO_SCF_00DBHOH_BILL10323_1-Gambling-Gambling-Harm-Reduction-Amendment.htm) (and scrolling to the very bottom of the webpage). A more detailed guide to making a submission is available [here](http://www.parliament.nz/NR/rdonlyres/ACB8A16D-D905-416C-AE98-A6BFB07E34B5/163597/makingasubmission2010_1.pdf).

**How do I write a submission?**

There are four key principles that apply when making a submission:

* Be relevant – Your submission must be relevant to the matter before the committee. A committee may decide not to receive a submission it considers off-subject.
* Be clear – Arrange your sentences and paragraphs in a logical order. Present a clear and logically developed argument. A submission that jumps from one issue to another and back again or jumbles unrelated issues together may confuse members and reduce its impact.
* Be concise – Be simple and direct. Do not write more than is necessary. Members want to know what you think and the evidence or arguments you have that support your view.
* Be accurate and complete – Include all relevant information. It will only confuse the committee if, in your submission, you refer to evidence or information that is not included. You must also ensure that your facts are correct. An error-ridden submission will greatly reduce its impact and credibility.

At the end of your submission it is advisable to restate your recommendations in a conclusion. Consider listing your submission’s recommendations or summing up its main points.

**General approach:**

The NSO has determined to focus its response to the Bill on the impact it will have on sport in the community, an impact that in all likelihood will be profoundly damaging and do more harm to the community that it will do good for the community.

The focus of the NSO is on the proposed changes to the funding mechanism for sport, those clauses that hand the distribution of net proceeds from non-casino gaming machine to dozens of small committees of local councils. This will fragment and politicise sports funding, making it impossible to apply for funding on a national basis on merit.

Sections the NSO believes are problematic for sport are:

* Clause 6 and clause 9 which require net proceeds to be distributed for purposes in the same territorial authority district in which the class 4 venue from which the proceeds originated is located;
* Clause 10 which replaces corporate societies and trusts with committees of territorial authorities with the purpose of distributing net proceeds.

**What to write in the submission**

First, give brief details of your sports organisation’s aims, membership and structure. Make sure that you have the authority to represent the organisation and note your position within the organisation.

Second, you should then state your general position on the bill, whether you support or oppose the measure being proposed, and give brief reasons.

Third, in the body of the submission you can make more detailed comments on the Bill in general and on any clauses of the Bill that are of concern to you, and the effect these provisions will have on your organisation.

It is for submitters themselves to decide what points they wish to emphasise, and the weight they wish to attach to the issues raised by the Bill. You need to state whether or not you wish to appear before the committee to give an oral presentation, and if you do, make sure you provide contact phone numbers and an email address. This is optional and up to the submitter to decide.

*Note: A suggested SAMPLE SUBMISSION is provided in the appendix.*

**Sending your submission:**

Unless you are making an online submission, you must send **two copies** of each written submission to the select committee secretariat before the closing date for submissions – **21 June 2012**.

Address your submission to:

*Secretariat*

*Commerce Committee*

*Select Committee Office*

*Parliament Buildings*

*WELLINGTON 6011*

You will need to pay postage to send your submission.

**Appendix: SAMPLE SUBMISSION**

**SUBMISSION ON THE GAMBLING (GAMBLING HARM REDUCTION) AMENDMENT BILL**

**TO THE COMMERCE COMMITTEE**

**FROM** *[insert name of sports organisation or sports club]*

Contact: *[insert contact person name, daytime phone and email address]*

*[Note whether you wish to appear before the Committee to speak to your submission – this is optional]*

**SUBMISSION**

We recommend that the Gambling (Gambling Harm Reduction) Amendment Bill not proceed due to the damage it will do to sport in New Zealand.

This submission is made in support of the submission by the National Sports Organisations Leadership Group and the *[insert name of relevant national sports organisation if a sports club].*

We believe the Bill is ill-conceived because in the cause of gambling harm reduction it will deliver the perverse outcome of doing profound damage to sport in New Zealand.

We believe the changes to the mechanism for distributing net proceeds from non-casino gaming machines proposed in the Bill will:

* Do lasting and widespread harm to sports organisations and sports clubs in New Zealand;
* Harm community health and wellbeing, community cohesion and connection;
* Reduce support for clubs from national sports organisations impacting on volunteers, officials, coaches, administrators, athletes and sportspeople;
* Undermine the tremendous work done by sports organisations and sports clubs to get more people active and engaged in community sports;
* Significantly increasing the cost of participation and reduce access to participation in community sport;
* Jeopardise a number of future national, regional and club sports events and cause some to cease altogether;
* Reduce transparency by fragmenting funding amongst local Councils and politicise the funding process;
* Hinder the future development of sport and efforts to grow the sporting success and reputation of New Zealand.

We believe that proposals to reduce gambling harm would be better served through a comprehensive and considered review of gambling harm.

We believe that proposals to strengthen compliance and transparency in the distribution of net proceeds from non-casino gaming machines would be better served through working with the sector to tighten exiting legislation and regulation where necessary.

We recommend that the Bill not proceed.