



GAMBLING HARM LIVED EXPERIENCE EXPERTS

PO Box 384 Hall ACT 2618

www.ghlee.org

info.ghlee@gmail.com

[Language Guide](#)

Submission to the Victorian Gambling and Casino Control Commission (VGCCC)

Re: Application for Additional Electronic Gaming Machines – Club Officer

Introduction

Gambling Harm Lived Experience Experts (GHLEE) strongly opposes the application by Club Officer for an additional 20 electronic gaming machines (EGMs).

GHLEE is a lived and living experience-led organisation, comprised of individuals who have directly and indirectly experienced gambling industry harm, including severe financial hardship, mental health impacts, family breakdown, suicidality and broader social harm associated with gambling.

Our position is clear and consistent:

- no new EGM applications should be approved;
- EGM numbers should be progressively reduced over time; and
- gambling harm prevention must be the determinative consideration in regulatory decision-making.

This position has been consistently advanced by GHLEE in previous submissions to the Victorian Government and the Victorian Gambling and Casino Control Commission.

1. GHLEE position on electronic gaming machines

GHLEE maintains that electronic gaming machines are a high-risk gambling product associated with disproportionate and well-documented harm.

These harms extend far beyond individual users and impact families, children, workplaces, communities, social systems and broader public health outcomes.

Electronic gaming machines are specifically designed to encourage prolonged play, repetitive gambling behaviour, dissociation (“the zone” or “dark flow”), continuous losses and impaired decision-making.

Accordingly, GHLEE’s position is that:

- no additional EGMs should be approved;
- no increases in machine numbers should occur; and
- a staged reduction in EGM accessibility should instead be prioritised.

The approval of an additional 20 machines would directly contradict any stated commitment to gambling harm reduction.

2. Existing harm is already significant

Victoria already experiences substantial gambling-related harm and losses associated with EGMs.

The Victorian Government's own research, including the [Social Costs of Gambling to Victoria 2023](#), identifies widespread and serious impacts associated with gambling harm, including financial devastation, mental illness, depression, relationship breakdown, family violence, suicidality and broader social and economic harm.

Against this backdrop, increasing the number of machines cannot reasonably be characterised as harm reduction.

Rather, it represents an expansion of access to a product already associated with substantial and preventable harm.

More specifically and from the most recent data published; Club Officer losses from its current 60 EGM's during the period 1 July 2025 to 31 December 2025 was \$4,055,231.00. It can be therefore anticipated that losses from these same 60 EGM's for the 2025/2026 financial year will be in excess of \$8 million or more than \$133,000 per machine.

Club Officer seeks to expand its number of EGM's by 33% and if granted, it will push annual gambling losses to a projected \$10.7 million. However, this is a conservative figure based upon the fact that in just three years with the same number of machines; Club Officer EGM losses have increased by \$1.6 million or approximately 20%.

Using these projections, in three years time it is not unreasonable to conclude that if this application is approved then EGM losses at Club Officer could surge to close to \$13 million in a very short period of time.

3. Increased access increases harm

GHLEE strongly rejects any suggestion that additional machines can be introduced without increasing harm.

The relationship between accessibility, availability, machine density and gambling losses is well established.

Additional gambling machine numbers:

- increases opportunities for gambling;
- increases exposure;
- increases normalisation; and
- increases harm.

The application by Club Officer therefore represents a foreseeable increase in gambling risk and harm exposure to a community already experiencing significant disadvantage.

GHLEE contends the Commission should adopt a precautionary approach based upon undisputable research and evidence on the impacts of gambling harm from EGM's and refuse this application.

4. Gambling harm is not confined to local government boundaries

While local community feedback is important, GHLEE remains concerned that EGM applications are often assessed through an overly narrow geographical lens.

Electronic gaming machines may be physically located within a particular municipality, however:

- gambling behaviour is mobile;
- people gamble where they live, work, socialise and travel; and
- harms are cumulative and geographically dispersed.

Accordingly, lived and living experience evidence from outside the immediate municipal area remains highly relevant and broader community harm considerations must not be discounted simply because an individual does not reside within the immediate local government area.

A framework that privileges narrowly "local" evidence over broader lived experience risks producing incomplete and distorted assessments of harm.

5. Existing reforms remain incomplete and delayed

GHLEE also notes that the Victorian Government has publicly committed to a range of major gambling harm reforms, including mandatory carded play, mandatory pre-commitment, reduced load-up limits and stronger machine safeguards.

However, many of these reforms remain delayed, incomplete or not operational in practice.

It is therefore deeply concerning that gambling expansion applications continue to proceed while core harm-reduction protections remain undelivered.

The Commission should not support additional machine approvals in circumstances where existing promised safeguards remain unimplemented.

6. Machine design itself contributes to harm

GHLEE reiterates that the harms associated with EGMs are not merely behavioural — they are product-driven.

These machines are intentionally designed to maximise engagement, encourage continuous play, reduce awareness of time and money and reinforce repetitive gambling behaviour.

Environmental adjustments and responsible gambling messaging alone are insufficient.

If any application were ever to proceed, GHLEE submits that the following minimum conditions should apply:

- mandatory carded play;
- enforceable loss limits;
- safer machine design standards;
- slower spin rates; and
- mandatory pre-commitment

However, GHLEE's primary position remains that no additional machines should be approved.

7. Community benefit claims must be treated cautiously

GHLEE is concerned that gambling applications frequently overstate community benefit claims while understating or externalising gambling-related harms.

Any claimed benefits:

- must be carefully scrutinised;
- must not outweigh foreseeable harm; and
- must be assessed against the substantial social and economic costs already associated with EGMs.

Revenue generated from EGMs is not neutral economic activity — it is derived directly from consumer losses, including losses experienced by individuals experiencing gambling harm.

8. Precautionary principle

GHLEE submits that the Commission should apply a precautionary and harm-prevention focused approach.

Any application should be rejected when there is a likelihood that there will be an:

- increase in gambling participation;
- increase of financial losses;
- increase of social and emotional trauma ;or
- increase of community harm,

Evidence, research and lived experience clearly shows that an increase in all the above-mentioned factors is not only likely, but unequivocally and unambiguously a certainty.

Given the established evidence base surrounding EGM-related harm, approving an additional 20 machines would be inconsistent with contemporary public health principles, harm reduction objectives and the Victorian Government's stated reform agenda.

Conclusion

GHLEE strongly opposes the application by Club Officer for an additional 20 electronic gaming machines.

The proposal would:

- increase gambling accessibility;
- increase exposure to harm;
- undermine broader harm-reduction objectives; and
- contradict the growing recognition of gambling harm as a serious public health issue.

Victoria does not need more poker machines.

What is required is meaningful reduction in gambling harm, implementation of long-promised safeguards, stronger consumer protections and a gradual reduction in reliance on high-risk gambling products.

GHLEE respectfully urges the Victorian Gambling and Casino Control Commission to refuse this application.

Submitted by:

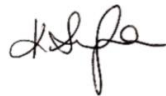
Gambling Harm Lived Experience Experts (GHLEE)



Anna Bardsley
Co-Founder



Paul Fung
Co-Founder



Kate Seselja
Co-Chair



Carolyn Crawford
Secretary



Shonica Guy
Treasurer



Rebecca Thorpe



Russell Northe