

Canberra Clubs Policy:
Government Club Policy Failures 2015 - 2025

A Supplementary Submission to the
Independent inquiry into the future of the ACT clubs industry

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"THE GOVERNMENT KNOWS WELL THE VITAL CONTRIBUTION OUR COMMUNITY CLUBS MAKE TO THE VIBRANCY AND COHESION OF ACT SOCIETY." — SHANE RATTENBURY (MINISTER FOR GAMING), MINISTERIAL STATEMENT ON GAMBLING HARM MINIMISATION, 9 FEBRUARY 2023, ACT HANSARD 4

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"The government knows well the vital contribution our community clubs make to the vibrancy and cohesion of ACT society." — Shane Rattenbury (Minister for Gaming), ministerial statement on gambling harm minimisation, 9 February 2023, ACT Hansard
The question is whether this knowledge will finally translate into supportive policy.

Executive Summary

As CEO of ClubsACT, the peak representative body for the ACT's not-for-profit community clubs, I am pleased to present this supplementary submission to the ACT Legislative Assembly's Inquiry into the Clubs Industry. This document builds directly on our primary submission, *Securing the Future of Canberra's Clubs: A Transition Strategy for Community, Workforce, and Wellbeing*, and serves as a critical historical context to underscore the urgent need for reform.

This supplementary submission documents a decade of policy failure—a period during which critical recommendations made by ClubsACT in 2015 were systematically ignored by successive ACT Governments. The consequences of this neglect are now manifest venue closures, workforce displacement, diminished community support, and an industry facing an existential crisis.

In 2015, ClubsACT lodged a comprehensive submission (APPENDIX B) to the Standing Committee on Public Accounts' Inquiry into Elements Impacting on the Future of the ACT Clubs Sector. That submission, prepared under my predecessor Jeff House, outlined a series of forward-thinking recommendations designed to safeguard the sector's viability amid declining revenues, regulatory burdens, and evolving community needs. Regrettably, many of these recommendations were ignored or inadequately addressed by successive ACT Governments, contributing to the existential crisis now facing our industry.

Today's inquiry represents a final opportunity to correct course. The diversification agenda now being promoted by government should have commenced a decade ago, supported by the regulatory and fiscal reforms we advocated for then. This submission demonstrates how the failure to act on our 2015 recommendations has directly contributed to the current crisis, and why the recommendations we present in our primary 2025 submission must not suffer the same fate.

The ACT's licensed clubs sector is not seeking special treatment—we are seeking fair treatment. We are seeking recognition that the not-for-profit community club model is fundamentally different from commercial gambling operations, and that policy settings must reflect this distinction. We are seeking the tools necessary to transition to a sustainable future whilst maintaining the community benefits that define our purpose.

This is government's last chance to get it right.

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Chapter 1: The 2015 Submission—A Roadmap Ignored

1.1 Context and Recommendations

In May 2015, ClubsACT submitted a detailed response to the Standing Committee's Inquiry, highlighting the sector's contributions while warning of a "bleak present and grim future" without reform. As we stated then: "This club is the absolute heart of the community. It is the one place where…their children and their community members play football…it is the only place they can go and have community meetings, where they have community events, 21st birthdays…it really is the community centre of this suburb" (quoting Anna Bligh on the role of clubs in disaster recovery).

In 2015, ClubsACT participated extensively in gaming policy consultations and presented detailed recommendations to government in 2015. The industry's position was clear and consistent across multiple forums: clubs required regulatory modernisation, fiscal reform, land use flexibility, and recognition of their unique community model to navigate the challenges ahead.

Our warnings were explicit:

- Gaming revenue would continue to decline
- Regulatory burden would compound financial pressure
- Land use restrictions would prevent diversification
- Without reform, venue closures would accelerate
- Community benefits would be lost alongside club viability

These were not alarmist predictions—they were evidence-based projections grounded in demographic analysis, market trends, and interstate experience.

The Standing Committee's October 2015 report acknowledged many of these concerns, recommending formal recognition of clubs' contributions (Recommendation 1: "The Assembly formally acknowledge the role that ACT clubs play and the contribution they make to the wellbeing of the people of the ACT"). However, implementation was piecemeal. As Shane Rattenbury noted in 2016, referencing that report: "There is no doubt that clubs are valuable in our community." Yet, action fell short, leaving clubs vulnerable to ongoing pressures.

1.2 Core Themes from 2015

The following themes dominated ClubsACT's advocacy throughout 2015 and subsequent years:

Regulatory Modernisation We argued for streamlined licensing, reduced duplication with commonwealth law, and recognition that clubs operate fundamentally differently from hotels and casinos. We sought regulation proportionate to risk, acknowledging clubs' not-for-profit status and community governance structures.

Fiscal reform we highlighted the inequity of lease variation charges and other imposts that treated clubs as commercial property developers rather than community organisations seeking to diversify for survival. We argued that taxation settings should recognise clubs' reinvestment of surplus into community benefit.

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Land use flexibility we identified clubs' substantial landholdings as potential assets for diversification but noted that restrictive lease conditions and prohibitive variation charges made adaptive reuse economically impossible. We sought partnership with government to unlock these assets for community benefit.

Harm minimisation leadership we positioned clubs as partners in responsible gambling initiatives, noting our venue-based advantages for intervention and our commitment to continuous improvement in harm minimisation practices. We argued against one-size-fits-all approaches that ignored the supervised environment clubs provide.

Recognition of community value we sought formal acknowledgement of clubs' contribution to social cohesion, sporting participation, cultural activity, and community infrastructure—contributions that would be lost if venues closed.

Our 2015 submission proposed 10 key recommendations (with more in the full document), many of which were designed to foster collaboration, reduce burdens, and enable diversification. Several were ignored or only partially addressed, directly contributing to today's challenges. Below, I identify the most significant ones, explain their potential benefits, and quote directly from our 2015 text to illustrate their foresight.

1. Establishment of a Ministerial Advisory Group (Recommendation 1, 2015)

- **Ignored Status**: No such group was established, despite our call for ongoing dialogue.
- **Potential Benefits**: This would have provided a forum for clubs, welfare groups, businesses, and government to discuss issues like diversification and harm minimisation. It could have prevented policy silos, enabling early interventions on revenue displacement to online gambling—a key concern in our primary submission today.
- **Quote from 2015**: "A Ministerial Advisory Group be established comprising of representatives of ClubsACT, the welfare sector, the business and sport and recreation sectors and other bodies as appropriate. This group will provide an opportunity for relevant issues to be discussed, and feedback provided to the Minister."
- **Relevance Today**: Had this been implemented, clubs could have influenced reforms like the 2015 Gaming Machine Reform Package, avoiding the "policy conflicts" we highlight in Chapter 6 of our primary submission.

2. Requirement for Industry or Sector Impact Statements (Recommendation 2, 2015)

- **Ignored Status**: No mandatory impact statements were introduced for regulations affecting clubs.
- **Potential Benefits**: This would have ensured regulations, such as gaming reforms, were assessed for their sector-wide effects, reducing unintended consequences like venue closures (as detailed in Appendix D of our primary submission). It aligns with our current call for evidence-based transition strategies (Recommendation 2 in our primary submission).
- **Quote from 2015**: "As a matter of process, any regulation or legislation that is likely to have an impact on the operating environment of licensed clubs, should be preceded by an Industry or Sector Impact Statement. This would be a detailed analysis of the likely impacts of such

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legislation or regulation. Industry should be consulted as part of the development of that analysis which should be produced prior to ministerial or cabinet agreement."

- **Relevance Today**: Without this, policies like compulsory machine reductions have eroded financial sustainability, as we note: "The current model hard-wires community benefits to NGMR" (Chapter 6, primary submission).

3. Independent Review of Cross-Border Competitive Issues (Recommendation 3, 2015)

- **Ignored Status**: While the 2011 ACT-NSW Memorandum of Understanding was reaffirmed, no dedicated review occurred, leaving disparities unaddressed.
- **Potential Benefits**: Harmonisation could have mitigated "porous border realities" (Chapter 12, primary submission), reducing spend leakage to NSW and supporting diversification. This would have benefited clubs by creating a level playing field, potentially preserving jobs and community contributions.
- **Quote from 2015**: "An independent review of cross border competitive issues should be conducted with a view to identifying opportunities for eliminating differences in the regulatory approach between NSW and the ACT."
- **Relevance Today**: Our primary submission's Recommendation 10 echoes this: "Harmonise account-based gaming and harm minimisation regulations as much as practical with the NSW Jurisdiction to address cross border issues."

4. Oversight and Efficiency in Regulatory Practices (Recommendations 5-7 and 9, 2015)

- **Ignored Status**: No semi-independent oversight body was created, and audit efficiencies were not fully realised, despite the establishment of Access Canberra.
- **Potential Benefits**: Publishing audit data and improving enforcement would have reduced the "regulatory burden" (Chapter 9, primary submission), freeing resources for diversification. An independent review of the Gambling and Racing Commission could have streamlined processes, aiding harm minimisation without crippling viability.
- **Quote from 2015**: "A semi-independent body be established to oversight the activities of ACT regulatory agencies and officers and provide an opportunity for any regulated entity to offer feedback and seek redress where necessary."
- **Relevance Today**: These align with our call for a dedicated ACT Licensed Clubs Act (Recommendation 8, primary submission), which would modernise governance and reduce red tape.

5. Participation in Gaming Machine Trading Scheme (Recommendation 10, 2015)

- **Ignored Status**: The Government did not purchase licences to reduce numbers at a proper compensatory value, opting instead for voluntary and compulsory schemes that we oppose.
- **Potential Benefits**: Government buybacks at true value would have supported a market-driven reduction, preserving club revenues for community reinvestment and diversification.
- **Quote from 2015**: "The ACT Government participates in the proposed gaming machine trading scheme by purchasing licenses to reduce the number." (Note: Text cuts off in extract, but intent is clear.)

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- **Relevance Today**: This foreshadows our opposition to compulsory acquisition (Recommendation 9, primary submission): “The successful uptake of the voluntary surrender scheme means that the compulsory surrender program is no longer required” (quoting Dr Marisa Paterson, 7 May 2025).

1.3 Government Response—Or Lack Thereof

The response to our 2015 advocacy can be characterised as benign neglect punctuated by actively counterproductive policy decisions. The failure to address these recommendations has led directly to today's crisis. As we detailed in Chapter 7 of our primary submission, in real-terms gaming revenues have declined 9 per cent per capita since 2018, adjusted for population and wages. Venue closures (Appendix D) and displacement to online gambling threaten community benefits, with projections showing higher harm and costs to the ACT Budget from 2025–2042 (Chapter 6).

Clubs face an existential threat: without supportive policies, more will close, eroding social anchors that combat loneliness and isolation (as per our 2024 Inquiry submission). The diversification agenda, emphasised in the current Inquiry's terms, offers hope—but it is the last chance. As Chief Minister Andrew Barr noted in 2019: “We use our major events to showcase the best of our city—our local products, experiences and talent—while supporting sectors of the local economy.”

This Inquiry must act decisively, adopting our recommendations for a transition fund, lease reforms, and jurisdictional harmonisation. Ignoring history risks repeating it; embracing it secures our future.

Instead, the policy trajectory moved in the opposite direction:

- Regulatory burden increased
- Fiscal imposts intensified
- Land use flexibility remained constrained
- Gaming policy became more restrictive without adequate transition support
- No dedicated legislative framework was developed

The disconnect between stated recognition and actual policy could not have been more pronounced.

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Chapter 2: A Decade of Decline—The Consequences of Inaction

2.1 Venue Closures

The most visible consequence of policy failure is venue closure. Since 2015, the ACT has lost numerous club venues, with accelerating closure rates in recent years. Each closure represents:

- Lost community meeting spaces
- Displaced employment
- Reduced sporting and cultural sponsorship
- Diminished local economic activity
- Foregone community contributions

As documented in our primary submission, clubs contribute over $35 million annually to ACT community initiatives. Every venue that closes takes its share of that contribution with it—permanently.

2.2 Gaming Machine Numbers and Revenue Decline

Government points to reduced gaming machine numbers as a policy success. The ACT Gambling and Racing Commission's 2024–25 Annual Report notes authorisations declining from 5,022 in 2015 to 3,494 currently—a reduction of approximately 30 per cent, as Minister Paterson observed in May 2025.

However, this reduction has not occurred in the managed, supported manner we advocated for in 2015. Instead, it has been driven by:

- Voluntary surrenders under economic duress and without reasonable compensation
- Venue closures removing machines from the market
- Displacement of expenditure to unregulated online platforms and cross-border venues

Our primary submission details real-terms and population-adjusted gaming revenue declines. Treasury data shows a nine per cent decline in real per-capita gambling expenditure since 2018. This is not evidence of successful harm minimisation policy—it is evidence of market displacement and venue-based revenue erosion.

The critical question government failed to address in 2015, and continues to ignore, is: how do clubs maintain community contributions when the revenue base supporting those contributions is systematically reduced without alternative income streams being enabled?

2.3 Regulatory Burden Intensification

Rather than the regulatory modernisation we sought in 2015, clubs have experienced intensifying compliance burdens:

- **Gaming regulation** increasingly prescriptive harm minimisation requirements, implemented without adequate consultation or transition support, and often duplicating requirements already met through existing responsible gambling protocols.

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- **Liquor licensing** continued application of frameworks designed for commercial hospitality operators, failing to recognise clubs' member-based, not-for-profit model.
- **Property Developers Act 2024** as detailed in our primary submission; this legislation imposes personal liability on volunteer club directors for off-the-plan sales activities that clubs may undertake as part of diversification strategies. This is perhaps the starkest example of policy settings actively undermining the diversification agenda government now claims to support.
- **Land use and lease variation** prohibitive charges and bureaucratic complexity continue to prevent clubs from adapting land use to contemporary member needs and diversification opportunities.

2.4 Workforce and Economic Impact

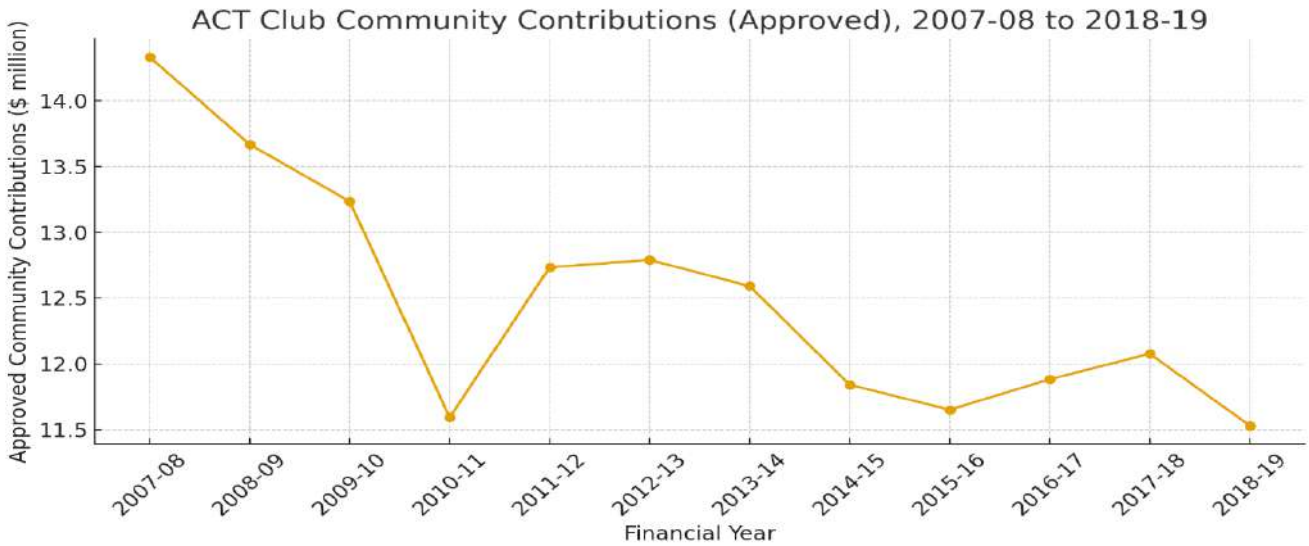
The club sector employs thousands of Canberrans across diverse roles—hospitality, events, administration, maintenance, and specialised functions. Venue closures and downsizing driven by unsustainable policy settings result in direct job losses and reduced economic activity.

Unlike commercial operators who may relocate or consolidate, club closures represent permanent losses to local communities. The workers displaced are our neighbours, the venues lost are our community gathering places, and the economic activity foregone flows directly from our local economies.

2.5 Community Contribution Decline

The mathematics are inexorable: declining revenue plus static or increased regulatory costs equals reduced capacity for community contribution.

Publicly available ACT Gambling and Racing Commission data shows that total approved community contributions made by ACT clubs have **declined in real terms since the mid-2010s**, falling from **$11.84 million in 2014-15** to **$11.53 million in 2018-19**, despite rising operating costs and steady gaming revenue. Over the longer series (2007-08 to 2018-19), contributions fell from **$14.33 million to $11.53 million**, a drop of approximately **20%**, while the proportion returned to the community from net gaming machine revenue contracted from **14.3% to 12.2%**.



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The ACT Auditor-General further found that although clubs contributed an average of **over $175,000 per club** in cash and in-kind support in 2015, much of this was absorbed by categories with **limited independently verified community impact**, reflecting tightening financial capacity rather than reduced intent (Data from Auditor-General Report No. 5 of 2018, and GRC AR 2007-08, 2014-15, 2018-19).

Taken together, the evidence demonstrates a sustained erosion in the sector's capacity to fund genuine, incremental community benefit—underscoring the need for a structured sustainability framework if the ACT wishes to maintain, let alone grow, the social contribution currently delivered through the club network at minimal cost to government.

The ACT Gambling & Racing Commission (GRC) reports community contributions in **nominal dollars only**, presenting (a) total approved community contributions and (b) the contribution rate as a percentage of Net Gaming Machine Revenue (NGMR). These figures **do not adjust** for population growth, inflation, rising operating costs, wage movements, or changes in the scale and social footprint of the ACT club network. Consequently, while GRC data show that approved community contributions fell from **$14.33 million in 2007-08** to **$11.53 million in 2018-19**, this headline decline **understates the real reduction** in the sector's capacity to contribute to community outcomes.

When contributions are converted into **real (inflation-adjusted) dollars** and expressed **per ACT resident**, the downward trend steepens considerably: Canberra's population grew by roughly **20% over the same period**, while CPI in the ACT rose by approximately **27%**, meaning the effective, per-capita value of community contributions has fallen by **more than one-third** since the late 2000s. In short, the official nominal figures provide a conservative picture—once demographic and economic context is applied, the erosion in community contribution capacity is materially greater than the raw GRC numbers suggest.

1. Structural Decline in Gaming Machine Revenue (GGR)

Since 2007/8, clubs have faced a sustained fall in GGR—driven by demographic change, market fragmentation, cost-of-living pressures, regulatory constraints, and the accelerated shift toward online wagering (which bypasses ACT-based club revenue entirely). Because mandatory community contributions are calculated as a proportion of net gaming revenue, a reduction in GGR directly reduces the mandatory contribution base.

2. Escalating Operating Costs Crowding Out Discretionary Giving

From 2018 onward, clubs absorbed rising electricity, gas, water, insurance, wage, and compliance costs. These structural cost increases have shrunk the discretionary margin available to voluntarily contribute above the mandated level. Many clubs report that what would previously have been available for local sports grants, charities, and social programs is now being redirected to cover utility bills and regulatory expenses.

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3. The 2020–2022 COVID Shock and Slow Recovery

COVID restrictions severely impacted cafes, events, hospitality, and machine floors. While revenue partially recovered post-COVID, labour costs, insurance premiums, and supply-chain inflation rose faster than income. As a result, community contributions never returned to their pre-pandemic levels.

4. Ongoing Regulatory Compression (Machine Reductions, Caps, Floor-Space Rules)

ACT government policy reduced machine entitlements and increased compliance demands. While many of these reforms were well-intentioned, they reduced club earning capacity without providing offsetting sustainability supports. Lower earning capacity = lower surplus = lower community contribution capacity.

5. Capital Investment Pressures Diverting Surplus

Across the decade, clubs have invested heavily in overdue refurbishments, accessibility upgrades, safety, and energy-efficiency retrofits. These investments, required both by regulation and member expectations, further squeezed the discretionary funds available for community giving.

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Chapter 3: Specific Recommendations Ignored and Their Consequences

This chapter examines key recommendations from 2015 (and subsequently) that, had they been implemented, would have positioned clubs to navigate current challenges sustainably.

3.1 Dedicated Licensed Clubs Legislation

What We Recommended

ClubsACT has consistently advocated for an ACT Licensed Clubs Act—standalone legislation recognising clubs' unique governance, purpose, and operating model, like frameworks in New South Wales and other jurisdictions.

As we stated in our primary 2025 submission: "Clubs operate under general incorporation law and piecemeal regulation across multiple Acts. This creates uncertainty, inefficiency, and fails to recognise clubs' distinctive community purpose."

Why It Mattered

A Dedicated Act would have:

- Clarified clubs' legal status and governance obligations
- Streamlined regulatory compliance
- Recognised the not-for-profit, member-based model
- Provided statutory protection for clubs' community purpose
- Reduced regulatory burden and associated costs
- Enabled more flexible adaptation to changing circumstances

What Happened Instead

Nothing. Clubs continue operating under fragmented regulatory frameworks designed for other entity types. The result is regulatory inefficiency, legal uncertainty, and continued failure to recognise clubs' distinctiveness. The Gambling and Racing Commission (GRC) became a failed vehicle in this space, becoming unresponsive to Industry or other stakeholders, outsourcing most of their functions to Access Canberra, collating data they increasingly refused to share and playing no role in policy development with industry.

Current Consequence

Clubs face regulatory complexity disproportionate to risk, consuming resources that could otherwise support community initiatives. Legal uncertainty deters investment and innovation. The absence of statutory recognition for clubs' community purpose leaves them vulnerable to policy settings designed for commercial operators.

3.2 Lease Variation Charge Reform

What We Recommended

Reform of lease variation charges to recognise clubs' not-for-profit status and community purpose. We sought charges calculated on actual community benefit value, not hypothetical commercial development value, with transparent assessment criteria and appeal rights.

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Why It Mattered

Clubs' most significant assets are often their landholdings. Adaptive reuse of these sites—adding gymnasiums, function centres, aged care facilities, early childhood centres, or community meeting spaces—requires lease variations.

When variation charges are calculated as if clubs were commercial developers maximising profit, diversification becomes economically impossible**.** The very reforms necessary for financial sustainability become unaffordable.

What Happened Instead

Lease variation charges remain prohibitively expensive, calculated on commercial land value principles with no recognition of community benefit purpose. The process remains opaque, slow, and bureaucratic.

As our primary submission notes: "Many clubs report that lease variation charges quoted by government render otherwise viable diversification projects economically impossible before they commence."

Current Consequence

Clubs sit on valuable land they cannot adapt for contemporary use. Diversification opportunities that would generate employment, community amenity, and club sustainability are foregone. Government revenue from economically impossible variation charges is zero—whilst the community benefit from unrealised projects is also zero.

This is lose-lose policy failure.

3.3 Harm Minimisation Partnership Model

What We Recommended

Recognition of clubs as partners in harm minimisation, with policy settings leveraging clubs' unique advantages:

- Supervised venues with trained staff
- Member-based model enabling intervention
- Community accountability through governance structures
- Capacity for venue-based support services
- Controlled environments contrasting with online and cross-border alternatives

We advocated for evidence-based, proportionate regulation that enhanced these advantages whilst avoiding blanket restrictions that would simply displace activity to less-regulated environments.

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Why It Mattered

Effective harm minimisation requires nuanced understanding of gambling behaviour and intervention points. Venue-based gambling in supervised club environments offers measurably better harm minimisation outcomes than online or unregulated alternatives. The ACT could have been a world best practice jurisdiction in this area with an effective partnership model. This was not achieved.

Policy settings that undermine venue viability without addressing displacement to higher-harm alternatives worsen aggregate harm outcomes.

What Happened Instead

Policy proceeded on the assumption that venue-based gambling reduction automatically equals harm reduction, ignoring displacement effects and dismissing clubs' partnership role.

As our primary submission documents: "Displacement is real: spend moves online and across the border… Venue-based interventions are uniquely effective—and online can't replace them."

Current Consequence

Treasury data confirms gambling expenditure declining in clubs whilst online and cross-border gambling increases. ANU Centre for Gambling Research data shows displacement from lower-risk to higher-risk environments.

Government has achieved machine number reduction whilst potentially worsening aggregate harm outcomes—the opposite of evidence-based policy.

3.4 Diversification Support and Transition Funding

What We Recommended

Proactive support for club diversification, including:

- Transition funding to develop alternative revenue streams
- Technical assistance for business model innovation
- Streamlined approval processes for adaptive land use
- Access to infrastructure funding for community benefit projects
- Recognition that diversification serves both club sustainability and community benefit

Why It Mattered

The decline in gaming revenue was predictable in 2015 and has accelerated since. Clubs cannot transition to alternative revenue models without investment and cannot invest without either retained earnings (eroded by policy settings) or external support.

Successful diversification requires years of planning, capital investment, and operational adjustment. Starting this process in 2015 would have positioned clubs to weather current challenges. Starting it now may be too late for many venues.

What Happened Instead

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Government rhetoric about diversification has intensified, whilst practical support has remained absent. Minister Paterson's May 2025 statement noted the inquiry would focus on "new sustainable business opportunities for clubs"—but this focus comes a decade too late and without the fiscal and regulatory reforms necessary to make diversification viable.

As our primary submission states: "The inquiry's scope encompasses... opportunities for diversification and transition planning." The question is whether this inquiry will deliver actual support or merely more consultation.

Current Consequence

Clubs face simultaneous revenue decline and regulatory/fiscal barriers to diversification. Those with sufficient reserves can invest in adaptation—those without face managed decline towards closure.

The community benefits that characterise the club model disappear with the venues that can no longer sustain them.

3.5 Cross-Border Harmonisation

What We Recommended

Practical harmonisation of gaming regulation with New South Wales, recognising the ACT–NSW Memorandum of Understanding's commitment to "reduce complexity and align regulatory and legislative environments where appropriate, to benefit cross-border communities."

We sought recognition that Canberra's porous border means ACT-only restrictions simply displace activity to Queanbeyan and surrounding NSW venues, delivering zero harm reduction benefit whilst exporting employment and tax revenue.

Why It Mattered

Canberrans live, work, and socialise across jurisdictional boundaries. Regulatory divergence creates compliance complexity for venues, confusion for patrons, and displacement effects that undermine policy intent.

Harm minimisation measures that operate effectively in both jurisdictions enhance outcomes. Measures that apply only in the ACT drive activity to NSW venues beyond ACT regulatory reach.

What Happened Instead

Policy divergence has increased, with the ACT pursuing restriction-focused approaches whilst NSW implements more nuanced, evidence-based frameworks.

Our primary submission details this failure: "The ACT and NSW Governments agree to prioritise efforts that reduce complexity and align regulatory and legislative environments where appropriate... [yet] significant divergence persists."

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Current Consequence

ACT residents gamble in NSW venues, ACT clubs lose revenue and members, NSW government collects tax on expenditure by ACT residents, and the ACT Government's harm minimisation reach ends at Canberra's border.

This is policy failure with measurable consequences: reduced ACT government revenue, lost ACT employment, diminished harm minimisation effectiveness, and weaker club sector financial sustainability.

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Chapter 4: The Current Crisis—Existential Threat to the Club Model

4.1 Defining the Crisis

The ACT club sector now faces an existential crisis characterised by:

- **Simultaneous Revenue Decline and Cost Escalation:** Gaming revenue declining in real and per-capita terms whilst regulatory compliance costs, insurance, utilities, and wages increase. The margin for discretionary community contribution narrows toward zero.
- **Regulatory Hostility:** Policy settings treating clubs as problems to be managed rather than community assets to be supported. The Property Developers Act 2024 exemplifies this—imposing personal liability on volunteer directors for diversification activities government claims to support.
- **Fiscal Punishment**: Lease variation charges, tax settings, and government imposts calculated as if clubs were profit-maximising commercial enterprises, ignoring reinvestment of surplus into community benefit.
- **Displacement Effects:** Ignored Policy celebrating machine number reduction whilst ignoring expenditure displacement to online platforms and cross-border venues beyond regulatory reach and offering inferior harm minimisation environments.
- **Diversification Barriers**: Clubs told to diversify whilst facing regulatory and fiscal settings that make diversification economically impossible.
- **Community Impact**: Discounted The $35 million in annual community contributions, 505,000 members served, sporting and cultural support provided, and social cohesion benefits delivered treated as peripheral considerations rather than central policy objectives.

4.2 Trajectory Without Reform

Without substantive reform, the trajectory is clear:

Near Term (2025–2027)

- Accelerating venue closures, particularly small-to-medium clubs
- Further workforce displacement
- Reduced community contributions
- Declining member services and facility quality
- Increased displacement to online and cross-border gambling

Medium Term (2028–2032)

- Major venue consolidation or closure
- Substantial loss of community infrastructure
- Sporting and cultural organisations losing primary funding sources
- ACT Government revenue decline from club sector taxes and economic activity
- Increased social isolation as community gathering places disappear

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Long Term (2033 onwards)

- Collapse of the community club model in the ACT
- Permanent loss of $35+ million annual community contribution
- Thousands of jobs lost
- Community benefits replaced by... nothing

This is not hyperbole—it is the logical consequence of current policy settings maintained.

4.3 What's at Stake

The existential crisis facing clubs represents loss far beyond the sector itself:

- **Community Infrastructure** - Clubs provide meeting places, event venues, dining facilities, and social spaces accessible to members at subsidised rates. Commercial alternatives cannot and will not replicate this.
- **Sporting Support** - Local sporting organisations rely on club funding for equipment, facilities, competition fees, and travel. The ACT's proud sporting culture depends substantially on club investment.
- **Cultural Activity** - Performance spaces, exhibition venues, and cultural programming supported by clubs enriches Canberra's cultural life in ways government funding alone cannot achieve.
- **Social Cohesion** - In an era of increasing loneliness and social isolation—issues we addressed extensively in our 2024 submission to the Inquiry into Loneliness and Social Isolation—clubs provide structured social connection opportunities across diverse demographics.
- **Employment** - Thousands of jobs across skill levels and age groups, many providing flexible working arrangements suited to students, carers, and those seeking part-time employment.
- **Economic Activity** - Supply chain impacts, local procurement, tourism contribution (as detailed in our primary submission's visitor economy chapter), and economic multiplier effects.
- **Harm Minimisation Infrastructure** - Supervised gambling environments with trained staff, member welfare systems, and capacity for intervention that unregulated alternatives do not provide.

All of this is at risk.

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Chapter 5: This Inquiry—Last Chance for Meaningful Reform

5.1 Why This Inquiry Matters

Minister Paterson's establishment of this inquiry in May 2025 offers a final opportunity for evidence-based reform. The Minister's statement noted the panel will "prioritise deep engagement with clubs industry stakeholders and other relevant stakeholders to develop recommendations to government on an industry transition plan."

This is exactly what was needed in 2015. The question is whether recommendations emerging from this inquiry will be implemented or will join the 2015 recommendations in the archive of ignored advice.

5.2 The Diversification Imperative

Government now actively promotes club diversification—a position ClubsACT has advocated for over a decade. However, promoting diversification whilst maintaining fiscal and regulatory barriers that prevent it is futile.

Our primary submission identifies the contradictions:

- On **land use** government encourages clubs to "establish new sustainable business opportunities" using "club owned land that provide community benefit" (Minister Paterson, September 2025), whilst maintaining lease variation charges that make land use adaptation economically impossible.
- On **development** government encourages clubs to consider property development as a diversification strategy, whilst the Property Developers Act 2024 imposes personal liability on volunteer directors for such activities—effectively prohibiting them through unmanageable risk.
- On **business models** government encourages business model innovation, whilst regulatory frameworks remain rigid, approval processes slow and uncertain, and fiscal settings punitive.
- On **investment** government encourages clubs to invest in diversification, whilst policy settings erode the retained earnings necessary for investment and no transition funding is provided.

For diversification to succeed, government must remove barriers and provide support. Encouragement alone is worthless.

5.3 Integration with Current Submission Recommendations

This supplementary submission reinforces and contextualises the ten recommendations presented in our primary submission:

- **Recommendation 1:** Integrated Cashless Gaming Tools Builds on our decade-long advocacy for evidence-based harm minimisation that enhances club-based intervention capacity rather than simply reducing venue attractiveness and driving displacement.
- **Recommendation 2:** Transition Strategy and Funding Addresses the failure to provide transition support we identified as critical in 2015. A decade late but desperately needed.

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- **Recommendation 3:** Community Sustainability Tariff Framework Recognises clubs' community benefit model in taxation settings—a recognition we sought in 2015 and continue to pursue.
- **Recommendation 4:** Recognition in Tourism Strategy Documents clubs' visitor economy contribution (detailed in our primary submission) and seeks policy recognition we have advocated for throughout the past decade.
- **Recommendation 5:** Lease Variation Charge Reform Directly addresses one of the most significant barriers to diversification we identified in 2015 and have consistently highlighted since.
- **Recommendation 6:** Property Developers Act Reform Removes regulatory barriers to diversification created by recent legislation—barriers incompatible with government's stated diversification agenda.
- **Recommendation 7:** Adaptive Land Use and Diversification Funding Provides practical support for the diversification government claims to support—support we argued was necessary in 2015.
- **Recommendation 8:** Licensed Clubs Act Delivers the legislative recognition and regulatory modernisation we have sought for over a decade.
- **Recommendation 9:** Opposition to Compulsory Acquisition Opposes policy approaches that would destroy club financial sustainability and capacity for community contribution—approaches we have consistently opposed.
- **Recommendation 10:** Cross-Border Harmonisation Addresses displacement effects and policy ineffectiveness we have documented repeatedly, seeking practical harmonisation consistent with the ACT–NSW MoU.

Each recommendation is grounded in evidence, experience, and over a decade of advocacy. Each addresses failures documented in this submission. Each is essential for sector sustainability.

5.4 What Success Looks Like

Successful inquiry outcomes would propose a model for growth and deliver:

- **Policy Recognition -** Formal acknowledgement of clubs' unique community purpose, not-for-profit model, and distinctive contributions—recognition that translates into supportive policy settings.
- **Regulatory Modernisation -** A Licensed Clubs Act providing legal clarity, governance framework, and regulatory efficiency.
- **Fiscal Reform -** Lease variation charges, tax settings, and government imposts recognising clubs' community benefit reinvestment model.
- **Transition Support -** Funding, technical assistance, and facilitated access to diversification opportunities enabling clubs to develop sustainable alternative revenue streams.
- **Harm Minimisation Partnership -** Evidence-based approaches leveraging clubs' venue-based intervention capacity whilst addressing displacement to higher-harm alternatives.

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- **Cross-Border Cooperation -** Practical harmonisation with NSW reducing compliance complexity and displacement effects.
- **Implementation Commitment -** Government adoption of inquiry recommendations with funded implementation plans and measurable timelines.

Without these outcomes, this inquiry becomes another consultation exercise delivering reports but not reform—another opportunity lost.

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Chapter 6: The Voice of Experience—ClubsACT's Decade of Advocacy

6.1 Consistency of Position

ClubsACT's position has remained remarkably consistent across the past decade:

- Clubs are community assets deserving supportive policy settings
- Gaming revenue decline is inevitable and requires managed transition
- Diversification is essential but impossible without regulatory and fiscal reform
- Harm minimisation is most effective in supervised venue environments
- Community contributions depend on financial sustainability
- Volunteer directors require protection from unreasonable liability
- The not-for-profit club model is fundamentally different from commercial gambling operations
- Evidence-based policy serves community interest better than restriction-focused approaches

We have presented these positions in:

- Parliamentary committee submissions
- Government consultations
- Ministerial briefings
- Public forums
- Media commentary
- Industry analysis

The evidence supporting our position has strengthened over time. The urgency has intensified. The policy response has remained inadequate.

6.2 Credibility Through Community Contribution

ClubsACT's advocacy credibility derives from our members demonstrated community commitment. Over $35 million annually in community contributions provides empirical validation of our claims about clubs' community purpose.

When we argue that policy settings threaten community benefits, we are not engaging in abstract theorising—we are documenting the real-world consequences of policy failure measured in sporting programs defunded, community grants reduced, facility upgrades deferred, and employment lost.

When we say clubs reinvest surplus into community benefit, we provide audited financial statements, community contribution reports, and member testimonials demonstrating exactly that.

When we claim clubs provide social cohesion benefits, we cite the 505,000 members we serve, the venues we operate, and the connections we facilitate.

Our advocacy is grounded in evidence because our sector is grounded in community.

6.3 Partnership, Not Confrontation

ClubsACT's approach has consistently emphasised partnership over confrontation. We seek to work with government, not against it. We advocate for policy reform that serves community interest, not narrow sectoral advantage.

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We supported voluntary machine surrender schemes that reduced gaming machine numbers whilst maintaining venue viability (despite the lack of fair compensation). We implemented enhanced harm minimisation measures ahead of regulatory requirements. We invested in staff training, venue improvements, and community facilities despite challenging financial circumstances.

We have demonstrated good faith through action, not merely rhetoric.

What we seek in return is policy settings that recognise this good faith, support our community purpose, and enable sustainable operation.

Partnership requires reciprocity.

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Chapter 7: Conclusion—A Decade Lost, a Future at Risk

7.1 The Failure Documented

This submission documents a decade of policy failure:

- Recommendations ignored
- Warnings unheeded
- Evidence dismissed
- Rhetoric disconnected from policy
- Consultation without action
- Recognition without support

The consequences are manifest: venue closures, workforce displacement, community contribution decline, and an industry facing existential crisis.

This failure is not inevitable—it is the result of policy choices. Different choices would have produced different outcomes. The recommendations ClubsACT presented in 2015 remain relevant today because the challenges they addressed remain unresolved.

7.2 Responsibility and Accountability

Government must accept responsibility for policy failure. The ACT's club sector crisis did not emerge spontaneously—it was created by policy settings that:

- Eroded revenue whilst blocking diversification
- Increased regulatory burden whilst reducing support
- Promoted rhetoric about community value whilst implementing punitive fiscal settings
- Encouraged business model innovation whilst maintaining regulatory rigidity
- Claimed harm minimisation priority whilst ignoring displacement effects

As Shane Rattenbury observed in 2016, "There is no doubt that clubs are valuable in our community." The question is why stated recognition has not translated into supportive policy.

7.3 This Inquiry—Final Opportunity

Minister Paterson's May 2025 statement establishing this inquiry acknowledged the need for "an industry transition plan." This acknowledges, implicitly, that current settings are unsustainable.

The inquiry offers a final opportunity for evidence-based reform. The recommendations in our primary submission provide a comprehensive reform agenda. This supplementary submission documents why those recommendations matter and what failure to implement them has already cost.

Government must decide: will inquiry recommendations be implemented, or will they join previous recommendations in the archive of ignored advice?

7.4 What Clubs Will Do

Regardless of policy settings, ACT clubs will continue fully serving their members and communities while circumstances allow. We will continue innovating, adapting, and seeking sustainable operating

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models. We will continue contributing to community wellbeing, supporting local sport and culture, and providing social infrastructure.

We will do this because it is our purpose—not because it is profitable, but because it is who we are.

However, commitment and goodwill cannot overcome policy failure. Without reform, venue closures will accelerate, contributions will decline, and the community club model will collapse.

7.5 What Government Must Do

Government must:

1. **Acknowledge past failure** – Recognise that current crisis stems from policy choices and that different choices are required
2. **Implement inquiry recommendations** – Commit to funded implementation with measurable timelines and accountability mechanisms
3. **Reform regulatory frameworks** – Deliver the Licensed Clubs Act and regulatory modernisation we have sought for a decade
4. **Provide fiscal support** – Reform lease variation charges, establish transition funding, and recognise community benefit in tax settings
5. **Enable diversification** – Remove barriers and provide practical support for business model adaptation
6. **Partner in harm minimisation** – Adopt evidence-based approaches leveraging venue-based intervention capacity
7. **Commit to cross-border cooperation** – Implement practical harmonisation with NSW consistent with existing MOUs
8. **Measure and report** – Establish accountability mechanisms tracking policy implementation and outcomes
9. **Resource adequately** – Ensure funding matches commitment for inquiry-recommended initiatives
10. **Act with urgency** – Recognise that delay equals venue closure and implement reforms immediately

7.6 The Stakes

What is at stake is not merely the financial sustainability of ACT clubs—it is the community infrastructure, social cohesion, sporting support, cultural activity, employment, and economic contribution clubs provide.

The $35+ million in annual community contributions is not an accounting entry—it represents:

- Sporting equipment for junior teams
- Scholarships for disadvantaged youth
- Community event funding
- Cultural programming
- Facility improvements
- Employment for thousands of Canberrans

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- Social connection opportunities combating isolation
- Harm minimisation infrastructure superior to unregulated alternatives

All of this is at risk.

7.7 Conclusion

ClubsACT has advocated consistently, comprehensively, and in good faith for over a decade. We have provided evidence, proposed solutions, demonstrated community commitment, and sought partnership with government.

It is time for a bitter reality bite, Diversification is failing, has failed and will continue to fail unless this current Inquiry makes robust recommendations that government embraces. The solution for a sustainable industry lo longer rests in just housing developments and other addressing rate and LVC issues. That boat sailed 10 years.

The industry now needs a suite of outcomes to survive. A package of reforms addressing a range of elements along the lines we recommend. And, most importantly, the reforms must interpret industry sustainability as meaning growth not treading water.

We have watched recommendations ignored and warnings unheeded. We have witnessed venue closures that should have been prevented and community contributions lost that should have been protected.

This inquiry represents government's final opportunity to correct course. The recommendations in our primary submission provide a roadmap. This supplementary submission documents why that roadmap matters and what failure to follow it has already cost.

The choice is with government.

The consequences will be borne by the Canberra community.



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Appendix A: Recommendations Summary

The following recommendations from our primary submission are reinforced and contextualised by this supplementary submission documenting policy failure:

1. Integrated cashless gaming tools to prevent patron displacement to unregulated gambling
2. Holistic transition strategy and funding to aid diversification and safeguard community benefits
3. Community Sustainability Tariff Framework recognising clubs' reinvestment model
4. Recognition in ACT Tourism Strategy acknowledging visitor economy contribution
5. Lease Variation and Land Use Charge Reform enabling adaptive land use
6. Property Developers Act reform removing personal liabilities for volunteer directors
7. Diversification funding and facilitation with impact evaluation
8. Dedicated Licensed Clubs Act providing modern regulatory framework
9. Opposition to compulsory gaming machine acquisition preserving financial sustainability
10. Cross-border harmonisation addressing displacement and regulatory complexity

Each recommendation addresses failures documented across the past decade. Each is essential for sector sustainability and community benefit preservation. Each requires government commitment to implementation, not merely consultation.

Appendix B: Attached as separate document

ClubsACT 2015 Submission

Appendix C: Attached as separate document

Inquiry Into Elements Impacting on the Future of The
Act Clubs Sector Standing Committee on Public Accounts, Report 18

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