

A consolidated reader's guide to the ClubsACT submission collection

Community Starts Here

Key issues, practical reform options and the case for a managed transition

Based on the consolidated ClubsACT inquiry submissions and policy papers, 2025-26

What this booklet is for

- To bring a large and technical submission collection into one plain-English product for readers who are new to the issues.
- To explain, chapter by chapter, what ClubsACT is arguing, why it matters to the Canberra community, and what practical reforms are being proposed.
- To present the key recommendations by theme, so policy-makers, members, media and community stakeholders can follow the reform logic without working through hundreds of pages.

The consistent message across the collection is simple: reform is necessary, but reform must be sequenced, evidence-based and partnership-driven. Transition should not mean managed decline. It should mean replacing riskier revenue with stronger community-facing activity while keeping the social infrastructure Canberra already relies on.

Index of source submissions (available from ClubsACT)

This booklet consolidates the attached ClubsACT submissions and policy papers.

Ther following submissions and related policy papers have been sourced for this document:

1. **Securing the Future of Canberra's Clubs: A Transition Strategy for Community, Workforce, and Wellbeing** - primary submission to the Independent Inquiry into the Future of the Club Industry in the ACT.
2. **Canberra Clubs Policy: Government Club Policy Failures 2015-2025** - supplementary submission to the Independent Inquiry into the Future of the Club Industry in the ACT.
3. **Beyond Diversification: A Growth Framework for Canberra's Club Sector** - policy paper for the Independent Inquiry into the Future of the Club Industry in the ACT.
4. **Submission to the ACT Legislative Assembly Inquiry into the Provision of Municipal Services in the ACT** - original version.
5. **ACT Budget Submission 2025-26: Community Infrastructure, Governance Capability and Sector Sustainability**.
6. **Submission to the ACT Legislative Assembly Standing Committee on Economics, Industry and Recreation: Inquiry into Canberra's Night-Time Economy**.
7. **Letter to Minister Marisa Paterson regarding media comments on the Chisholm Club closure**.
8. **ClubsACT response on policy settings for the introduction of account-based gaming and associated additional harm-minimisation measures**.
9. **Submission to the Standing Committee on Economics, Industry and Recreation: barriers and opportunities for participation in sport and physical recreation in the ACT**.
10. **Establishing a New Generation of ACT Community Clubs: A Policy Framework for Growth-Oriented Club Development**.
11. **Submission to the ACT Legislative Assembly Standing Committee on Economics, Industry and Recreation: Inquiry into Canberra's Tourism Strategy**.
12. **Submission to the ACT Legislative Assembly Inquiry into the Provision of Municipal Services in the ACT** - expanded version.
13. **Exploding the Myth: Club Revenue, Gaming Revenue (GGMR/NGMR) and Club Profitability**.
14. **Letter to the ACT Clubs Independent Inquiry panel: six practical questions before recommendations are settled**.
15. **Covering note attaching the Inquiry into the Fiscal Sustainability of the ACT - Interim Report and linking its findings to ClubsACT's inquiry material**.

Note: where a title appears twice, the later version is a revised or expanded submission included separately in the source pack.

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Plain-English glossary

Term	Meaning
Community infrastructure	Facilities and services that people rely on locally - sport, meeting space, meals, events, social connection and related support.
Displacement	When activity does not disappear after reform but shifts somewhere else, such as online or across the NSW border.
Diversification	Building new revenue streams that do not depend on gaming machines.
GGMR	Gross gaming machine revenue - the topline amount retained by machines before later costs are counted.
NGMR	Net gaming machine revenue after gaming tax and statutory levies - closer to the operating pool than GGMR.
Agent of change / order of occupancy	The principle that new sensitive development near existing entertainment activity should manage its own acoustic impacts rather than retrospectively shutting down lawful existing uses.
Model club	A future-ready community club: financially sustainable, useful to the public, well governed and less dependent on high-risk revenue.
Transition funding	Targeted support to help viable clubs move from old revenue settings to new ones without losing core community functions along the way.

Introduction

This booklet brings together the key messages from the ClubsACT submission collection into one plain-English guide for readers who are new to the debate. Its central point is simple: Canberra's clubs are not just venues - they are community infrastructure, supporting sport, social connection, local jobs, green space, events and place-based services across the Territory. The policy choice is therefore not whether change should happen, but whether change will be managed as an orderly transition that reduces harm while preserving community value or allowed to become a managed decline that strips capacity and pushes risk, spending and activity elsewhere. Read this booklet as a practical guide to what the submissions say, why the issues matter, and what a workable reform path would look like in practice.

1. The story across the submissions

Taken together, the submission collection advances one coherent argument. Canberra's clubs are not asking to be frozen in time. They are asking for a practical transition framework that reduces harm, protects employment, supports diversification, and keeps community benefit in place while change occurs.

Across the papers, the same themes recur: clubs as social infrastructure; the need for growth rather than contraction-only policy; the risk that poorly sequenced reform pushes activity online or across the border; the drag created by planning, lease and utility settings; and the case for a modern legislative architecture that regulates clubs as a distinct, community-based sector.

In plain English

- The collection does not argue against reform. It argues against reform that strips revenue first and hopes resilience turns up later.
- It frames Canberra's clubs as local institutions that carry costs government would otherwise have to pick up more directly.
- It proposes partnership, measured transition and stronger governance in place of blunt, extractive settings.

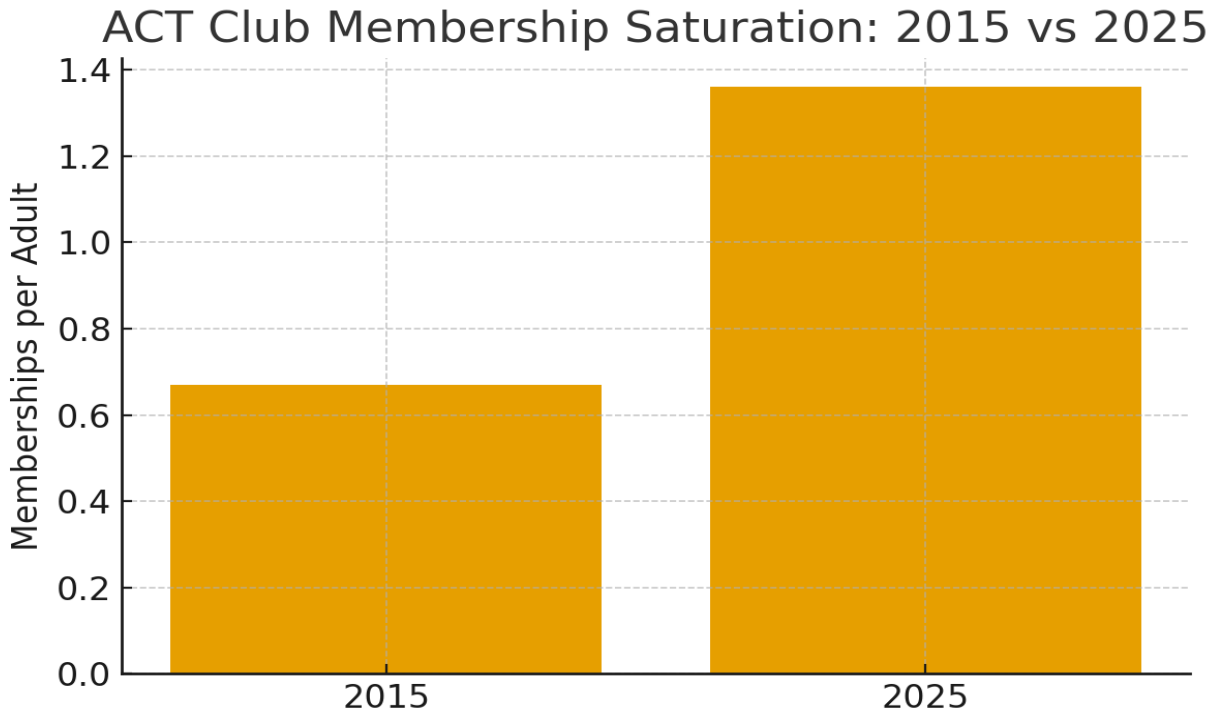
This is why the voice of the collection is firm but pragmatic. The repeated ask is not for indulgence. It is for policy settings that match the reality of how clubs operate, how community value is funded, and how long replacement revenue actually takes to build.

Core narrative	Community clubs are already changing. The issue is whether government settings help that transition succeed or force otherwise viable institutions into avoidable contraction.
Substantive recommendations	• Adopt a whole-of-sector transition strategy rather than piecemeal measures. • Define sustainability as durable replacement of revenue, not simply survival under shrinking margins. • Treat clubs as partners in delivering community outcomes, not just as regulated venues.

2. Clubs as community infrastructure

A reader new to this debate needs to start here: the collection presents clubs as distributed community infrastructure. That means places where sport, meals, meetings, volunteering, social contact, cultural activity and local employment are bundled together in the suburbs and districts where people actually live.

The primary clubs industry submission describes a sector serving more than 505,000 memberships, holding more than $1.5 billion in assets, contributing more than $35 million annually to the community, and supporting a large hospitality and community-services workforce. The papers repeatedly emphasise that this value is not abstract. It shows up as junior sport, low-cost rooms, maintained greenspace, cultural support, casual jobs, meals, events and social connection.



The membership saturation graphic from the primary submission captures the point neatly: clubs are not fading out of Canberra life. They are deeply embedded in it.

Why it matters	If clubs are treated only as gaming or liquor outlets, policy misses the wider civic role they play. Once that role is recognised, the reform question becomes how to preserve community value while the business model evolves.
Substantive recommendations	• Formally recognise community clubs as infrastructure providers in government policy and funding frameworks. • Reflect the not-for-profit, member-based character of clubs in taxation, utility and regulatory settings. • Use community-benefit measures that capture social, sporting, cultural and environmental value, not only narrow financial indicators.

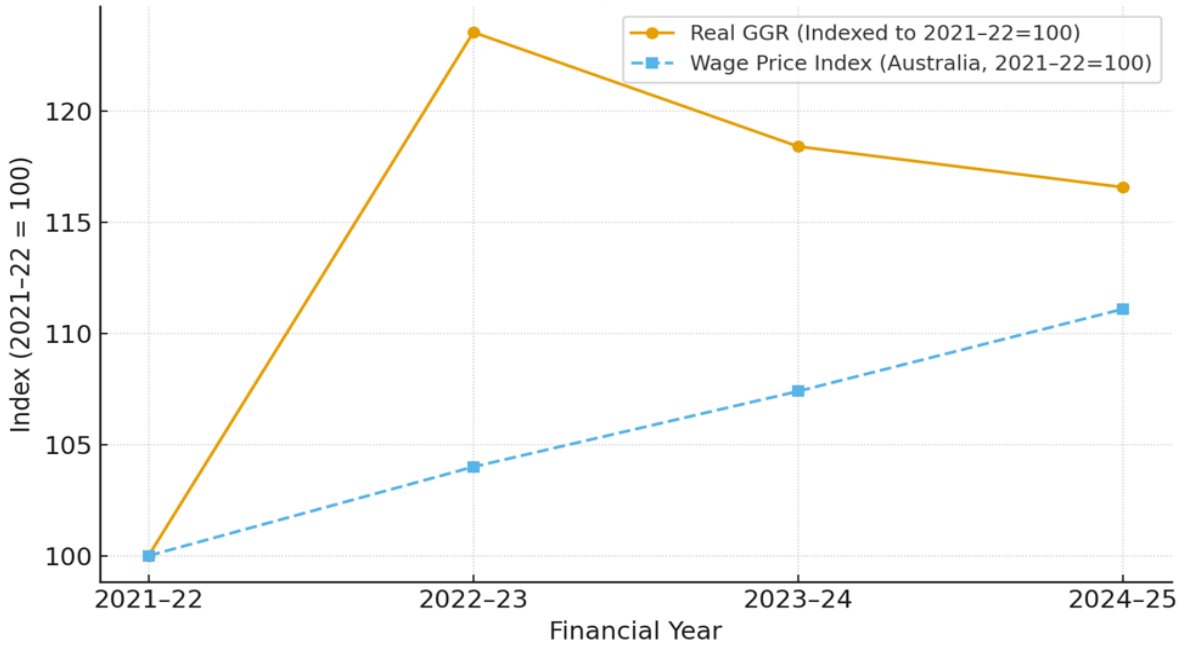
3. Harm minimisation, displacement and the transition challenge

Displacement is not a side issue. It is the policy test.

When activity is pushed out of supervised ACT venues without addressing online gambling and cross-border leakage, the demand does not disappear — it relocates.

One of the most consistent propositions in the collection is that harm minimisation works best when it is evidence-based and properly sequenced. The submissions accept the need to reduce gambling harm. The argument is about method. If supervised, venue-based activity is made less viable without stronger controls on online and cross-border alternatives, risk is not necessarily removed. It can simply move.

That is why the collection repeatedly links venue reform to displacement. Canberra sits beside a porous NSW border and within an online market that is growing faster than venue gambling. In that context, the papers argue that the ACT should focus on integrated measures: voluntary pre-commitment, spending alerts, self-exclusion tools, staff intervention, stronger online reform, and practical harmonisation where technology and patron movement make misalignment self-defeating.



The source material also emphasises that real and wage-adjusted gaming intensity has been easing, which is used to support the case for careful transition rather than blunt escalation.

Why sequencing matters

- Community benefit in the current system is still heavily cross-subsidised by gaming-derived margins.
- If those margins are reduced faster than replacement revenue is built, clubs lose both flexibility and community-serving capacity.
- That creates a double risk: higher exposure to online or cross-border displacement, and a larger future call on the ACT budget.

Substantive reform line	The collection supports harm reduction, but not through a policy design that weakens supervised venues while leaving less-regulated channels comparatively attractive.
Substantive recommendations	• Implement integrated cashless or account-based tools only where they are practical, patron-facing and aligned with workable technology settings. • Prefer voluntary limit-setting, spending alerts and self-exclusion features over blunt one-size-fits-all models. • Coordinate venue reform with stronger action on online gambling and cross-border leakage. • Avoid compulsory acquisition or rapid reduction settings that compress community capacity before transition projects mature.

4. Growth, diversification and land use reform

The real choice is managed decline or managed transition.

Managed decline removes capacity first and hopes something new appears later. Managed transition sequences reform, enables growth, and protects the community value clubs already deliver.

A central idea running through the supplementary papers is that diversification on its own is not enough. Diversification without growth can become managed decline. If clubs are told to replace gaming revenue but are simultaneously boxed in by planning delays, lease restrictions, high utilities, funding gaps and narrow permitted uses, the transition becomes rhetorical rather than real.

The collection therefore argues for a growth-enabled model: clubs should be able to expand non-gaming activity, redevelop parts of their land, host new uses, enter partnerships, and invest in facilities that generate recurring community-facing income. In this framing, diversification is not just about property. It includes hospitality, events, allied health, co-working, training, childcare, affordable housing, wellness, tourism-facing activity and other place-based services.

What the growth papers propose	The proposed growth framework is designed to create renewal, not merely to soften contraction. It aims to make community clubs investable, useful and relevant in new ways while holding onto their public-value character.
Substantive recommendations	• Create a Community Club Licence or similar statutory class focused on public value, community utilisation and long-term sustainability. • Introduce a Community Club Planning Code with deemed or clearer approvals for suitable uses. • Enable time-limited innovation pathways for low-risk services and trial activities. • Establish a start-up or transition facility using disciplined loans, guarantees or co-investment rather than open-ended subsidy.

This is also where the 'model club' and 'Community Club Licence' concepts sit. The point is to create a pathway for future-ready clubs that are financially sustainable, socially embedded and increasingly independent of high-risk revenue. That is a much stronger organising principle than simply shrinking the old model and waiting for the market to fill the gap.

5. Regulation, governance, a modern legislative framework

Another strong theme across the collection is that clubs are being regulated through a patchwork of gambling, liquor, planning and development settings that do not fully reflect what clubs are. The proposed answer is not deregulation. It is better regulation: proportionate, sector-specific and clearer.

That is the logic behind the call for a dedicated ACT Licensed Clubs Act. In the submissions, such an Act would not water down standards. It would organise them properly. Governance, community purpose, harm minimisation, member democracy, training obligations, reporting, diversification support and risk-based compliance could then sit within one coherent industry framework rather than being scattered across multiple systems designed for different kinds of entities.

The same reasoning underpins the papers on lease variation charges and the Property Developers Act. ClubsACT's argument is that not-for-profit clubs pursuing community-linked redevelopment should not be treated as though they are speculative commercial developers, and volunteer directors should not be exposed to unnecessary personal risk for stepping forward to govern community institutions.

The regulatory principle

- Sharper governance and clearer rules are not in conflict with sustainability.
- The submissions argue that better-designed rules reduce system risk while lowering unnecessary friction.
- This is reform through coherence, not reform through clutter.

Key recommendations under this theme	The collection consistently asks for rules that are tougher where risk is high, lighter where risk is low, and more honest about the difference between not-for-profit clubs and commercial operators.
Substantive recommendations	• Create a dedicated ACT Licensed Clubs Act with tiered, risk-proportionate obligations. • Reform or phase out lease variation settings that undermine diversification feasibility. • Tailor development and licensing obligations for not-for-profit community clubs. • Protect volunteer directors from disproportionate personal liability under developer-style regimes. • Lift governance capability through mandatory training, Community Value Statements and stronger sector stewardship.

6. Visitor economy, night-time economy and public safety

The submission collection also places clubs within Canberra's visitor economy and night-time economy. This is important because it broadens the discussion beyond the gaming debate. Clubs are described as a hidden layer of tourism and event infrastructure: dining rooms, function spaces, sports venues, live entertainment settings and affordable social places that strengthen the city's overall offer.

The night-time economy papers are especially clear that Canberra does not suffer from a lack of creativity. It suffers from fragmented delivery. Noise, licensing, planning, safety, transport and municipal response are too often treated as separate systems when they are really parts of one after-dark operating environment.

That is why the recommendations are precinct-based. The collection supports agent-of-change and order-of-occupancy principles, modernised noise settings, streamlined approvals, creative-venue pathways, and more visible safety architecture. It also insists on something practical but often overlooked: hospitality workers and venues are already acting as frontline responders. Policy should recognise and support that reality rather than assuming it away.

The night-time reform package	The aim is not a louder city for its own sake. It is a safer, more predictable and more investable after-dark economy that can sustain culture, hospitality and community use.
Substantive recommendations	• Adopt precinct-based noise regulation with clear entertainment, transition and quiet zones. • Embed agent-of-change and formal order-of-occupancy principles for designated mixed-use precincts. • Create risk-based and low-risk entertainment licensing pathways with simpler approvals. • Establish a Night-Time Economy Office, concierge function and integrated business guidance. • Lift visible policing, CCTV coverage, lighting, patron dispersal management and coordinated venue-government safety partnerships.

7. Sport, municipal services and local liveability

Several documents in the collection make the same broader point from a different angle: clubs do not only matter inside their walls. They influence the condition of suburbs, local sporting ecosystems and the public realm around them. That is why the sport participation and municipal-services submissions sit logically beside the core clubs-industry papers.

On sport, the argument is that clubs can help grow participation quickly if policy focuses on access, inclusion and time on facility. The recommendations are practical: long-term community leases, co-investment in female-friendly and accessible amenities, shared-use templates, more transparent pricing, digital booking tools, targeted support for beginners and low-income households, and stronger pathways from schools into club participation.

On municipal services, the collection argues that poor lighting, graffiti, damaged paths, waste accumulation and inconsistent maintenance directly affect safety, participation and visitation. These are not cosmetic complaints. They are a liveability and confidence issue. Small signs of neglect add up. They reduce attendance, erode local pride and weaken the places where community starts.

What ties these submissions together

- The same local club can be a sports hub, a social venue, a greenspace steward and a neighbourhood anchor.
- When access routes, lighting, maintenance and shared-use settings are poor, the community effect is immediate.
- When they improve, the gains run across health, inclusion, safety and suburban vitality.

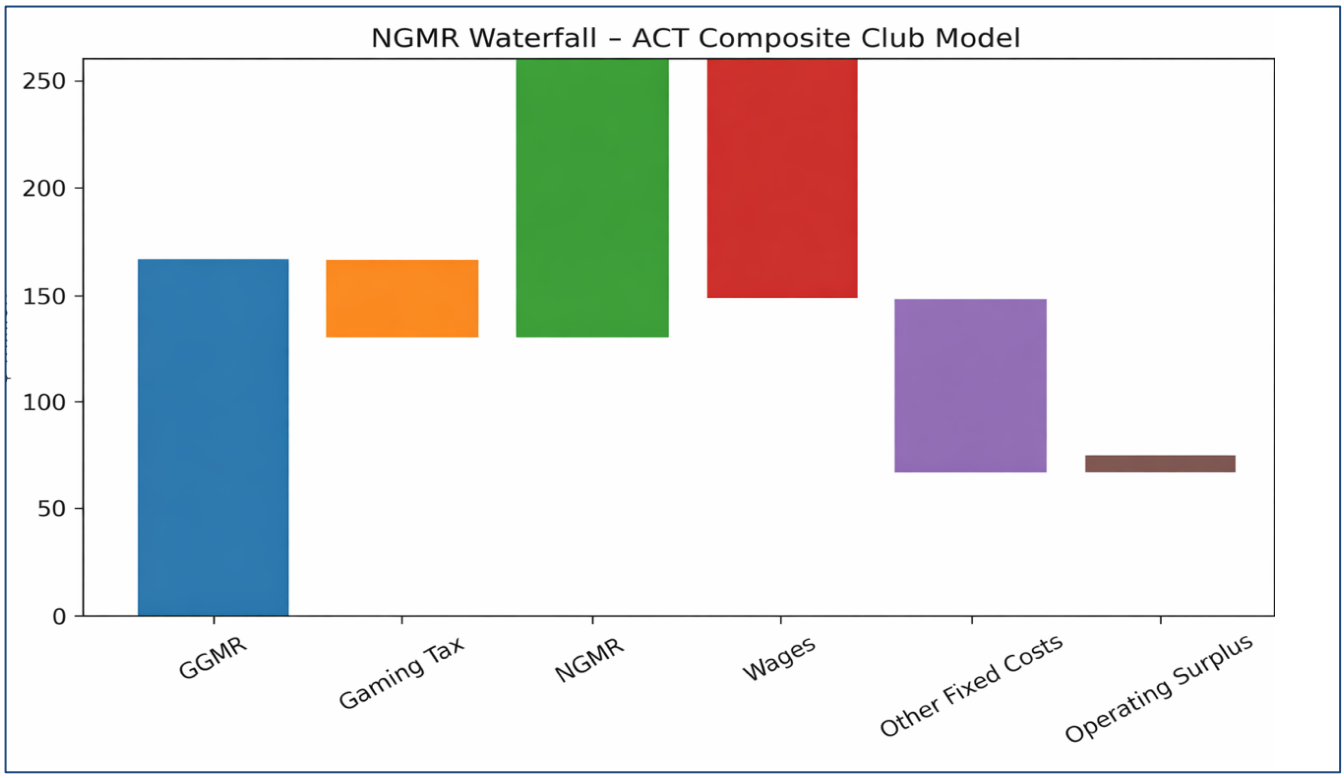
Practical actions	These submissions are place-based. They focus on how to make clubs, and surrounding precincts work better for ordinary users rather than only for policy specialists.
Substantive recommendations	• Standardise community leases and shared-use agreements with Community Use Guarantees. • Prioritise co-investment in lighting, female-friendly amenities, accessibility upgrades and multi-use facilities. • Introduce targeted vouchers, micro-grants and transport supports to reduce participation barriers. • Create a City Standards Taskforce, rapid-response municipal maintenance protocols and public performance dashboards. • Develop co-funded municipal partnership models with clubs for greenspace, access, safety and local-centre improvement.

8. The revenue reality: why GGMR is not profit

This is the chapter that changes the picture. The profitability report in the collection exists to challenge a common shorthand in public debate: the assumption that gaming revenue and profit are basically the same thing. The report argues they are not.

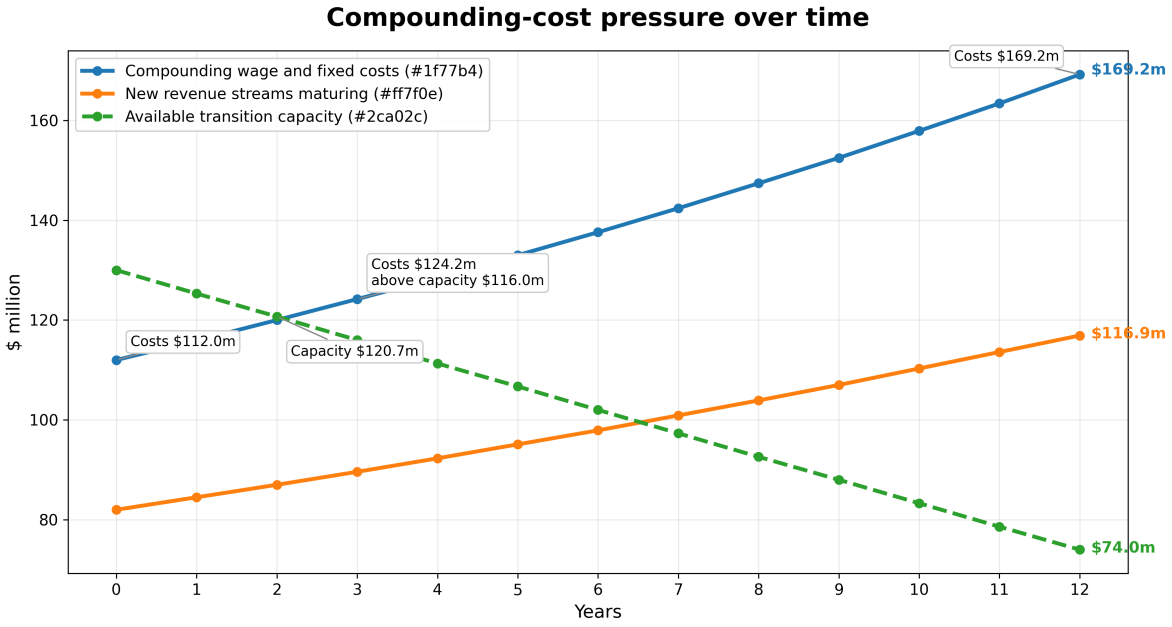
It's plain-English case is that gross gaming machine revenue is a top-line figure. It is the starting point of the cost waterfall, not the surplus at the end of it.

Before a club reaches anything like a meaningful operating surplus, that revenue is reduced by gaming tax and levies, then absorbed by wages, utilities, insurance, depreciation, maintenance, finance costs, compliance and other fixed or semi-fixed expenses. In the weighted composite presented in the report, the residual operating surplus is structurally narrow.



The waterfall illustration is used in the source material to show how little room sits between topline gaming revenue and the remaining operating buffer.

Costs can overtake transition capacity well before replacement revenue streams mature

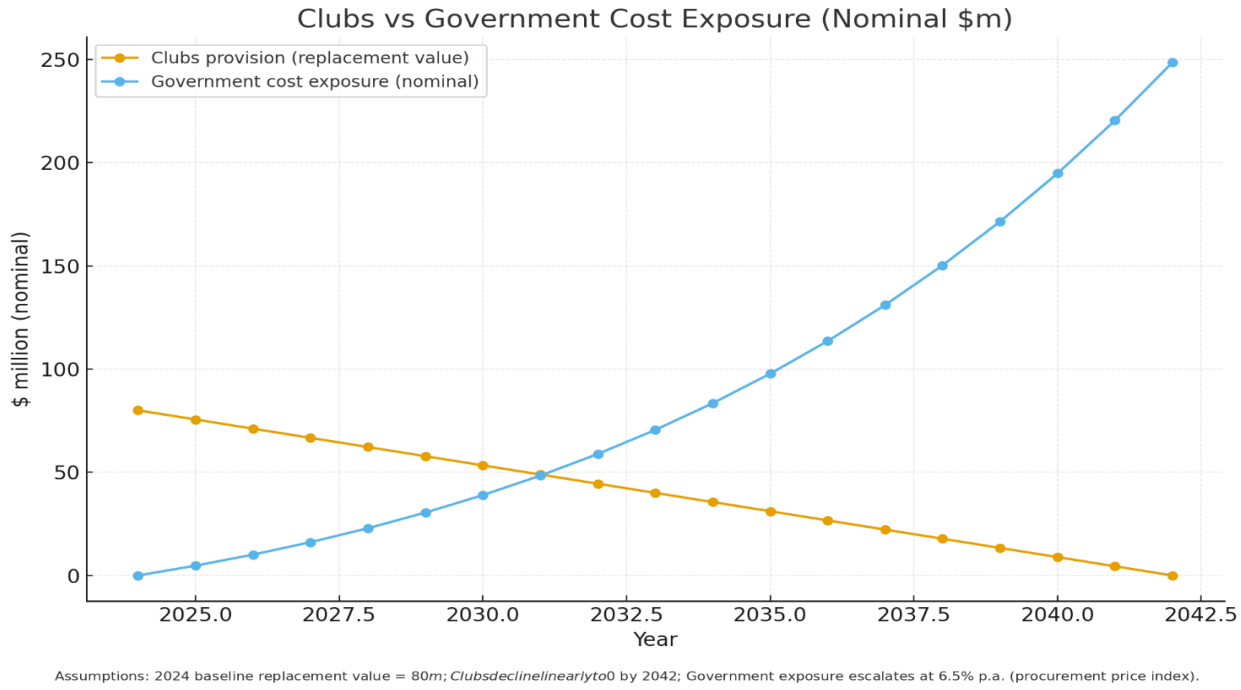


Reconstructed series used in the submission graphic. Crossover occurs around Year 2–3: by Year 3, costs (124.2*m*)*exceedtransitioncapacity*(116.0m).

Why this matters in policy	If public debate treats GGMR as spare cash, it will overestimate clubs' ability to absorb rapid shocks. The report argues that this is a category error with serious consequences for community funding and employment.
Substantive recommendations	• Do not use topline gaming-revenue figures as a proxy for financial resilience. • Assess reform against actual surplus buffers, fixed costs and timing risk. • Recognise that gaming-linked taxes and levies are applied before profit is known. • Sequence machine-reduction and transition policies around realistic cost and capital horizons.

9. Budget, fiscal risk and the public-interest case for reform

The budget and fiscal-sustainability material ties the whole collection together. It argues that clubs are already providing a spread of services and facilities more cheaply than government would be able to replicate directly. That means the debate is not just about club viability. It is about future fiscal exposure. The collection therefore frames transition support as preventive spending rather than special pleading. Concessional tariffs, transition funding, capability support and planning facilitation are presented as comparatively modest investments that help avoid larger downstream costs: venue closures, deferred maintenance, lost sporting capacity, weaker local services and a greater direct burden on the Territory budget.



The government-cost-exposure chart in the primary submission is used to argue that if club-provided services shrink without replacement mechanisms, direct public costs will eventually rise sharply.

(Note: This chart models the projected shift in community service funding responsibility between Canberra's licensed clubs and the ACT Government under current policy and fiscal settings. The decline in clubs provision is less likely to be linear given current policy mechanisms and may see more severe step downs.

*A baseline value of **$80 million in 2024** was used to represent the estimated **replacement cost** of services currently provided by clubs to their communities — including subsidised sport, community facility access, and green-space maintenance. It assumes this contribution declines **linearly to zero by 2042**, reflecting increasing regulatory pressure, declining gaming margins, and reduced capacity to cross-subsidise social outcomes.*

*The Government's "cost exposure" line represents the value of services that would need to be **purchased externally** (through NGOs or Not-for-profit General Market Replacement –* NGMR*) as club-based provision diminishes. This exposure escalates at an assumed **6.5% per annum** compound rate, consistent with public-sector wage growth and procurement inflation.*

The result is a clear inflection point in the mid-2030s where Government expenditure would surpass the sector's current total contribution — indicating that, without structural reform, the ACT will face rapidly increasing direct costs to replace services that clubs presently deliver at no cost to the taxpayer).

Public-interest framing

- The policy choice is not between paying nothing and reforming clubs.
- The real choice may be between supporting transition now or funding replacement services later at higher cost.
- That is why the collection repeatedly presents clubs as a fiscal, community and liveability issue all at once.

Budget-facing recommendations	The fiscal argument in the collection is that targeted support now is cheaper, steadier and fairer than a future scramble to replace lost local capability.
Substantive recommendations	• Introduce concessional water and utility settings for eligible community and sporting infrastructure. • Establish a Community Club Sustainability and Transition Fund with co-investment disciplines. • Create time-limited cost-of-service relief where essential community providers face acute pressure. • Fund governance and capability uplift so boards and managers can handle transition well. • Add planning and redevelopment facilitation support for viable diversification projects.

10. Consolidated recommendations by theme

The table below draws the collection into one reform package. It does not treat every recommendation as identical in weight. Rather, it shows how the submissions fit together as a practical program built around transition, public value and accountability.

Theme	Lead action	Why it matters
Community recognition	Recognise clubs as community infrastructure providers	Use policy and funding settings that reflect the sector's social, sporting, cultural and environmental role.
Harm minimisation	Deploy integrated, evidence-based venue tools	Support workable account-based tools, voluntary limit-setting, stronger staff intervention and better online and cross-border alignment.
Transition	Create a whole-of-sector transition framework	Sequence reform, protect community continuity and define sustainability as replacement revenue plus maintained public benefit.
Diversification	Remove barriers to new revenue	Reform lease, zoning, approvals and utility settings so clubs can build hospitality, services, events, housing-linked and place-based income.
Growth model	Establish a Community Club Licence pathway	Enable new or renewed clubs that are purpose-led, investable and clearly tied to community outcomes.
Governance	Lift standards while reducing unnecessary burden	Use a dedicated Licensed Clubs Act, board training, clearer reporting and risk-proportionate compliance.
Night-time economy	Adopt precinct-based reform	Modernise noise, planning, licensing, order-of-occupancy, safety and activation settings so Canberra can support a stronger after-dark economy.
Sport and participation	Back access and inclusion	Invest in lighting, amenities, digital booking, shared-use rules, vouchers and transport supports that make participation easier.
Municipal liveability	Treat local amenity as an economic and social issue	Lift maintenance standards, lighting, graffiti response, access and partnership arrangements around club precincts.
Budget and fiscal risk	Invest early to avoid larger costs later	Use transition funding, concessional tariffs and planning facilitation as prevention measures that reduce future public exposure.

The through-line

- The submissions do not advocate stasis. They advocate a smarter route to change.
- The public-interest test used throughout is whether reform reduces harm, protects community value and gives viable institutions a credible pathway to adapt.
- That is the basis on which the collection asks government to act with urgency, but not recklessly.

11. What success would look like

The submission collection is ultimately about results, not process. In practical terms, a successful ACT reform program would produce the following outcomes over time.

By the end of the decade, success would look like this

- Clubs are less reliant on high-risk revenue because new business lines are working, not because community service has been cut back.
- Gaming harm is addressed more precisely, with strong patron tools and better coordination across venue, online and cross-border settings.
- Canberra has a clearer legislative architecture for clubs, with stronger governance and less needless friction.
- Sporting, cultural and suburban facilities remain open, maintained and actively used.
- The night-time economy is safer, more predictable and more investable, with fewer planning and noise conflicts.
- Government is carrying less replacement cost because community infrastructure has been stabilised rather than allowed to fail.

That is the difference between transition and attrition. One produces renewal. The other simply shifts cost and risk downstream.

12. Six practical questions for decision-makers

One of the final letters in the source collection reduces the whole debate to six practical questions. Reframed for readers of this booklet, they are a useful test of whether any future reform package is serious enough to work.

- If supervised venues are weakened without stronger controls on online and cross-border gambling, how will the ACT stop risk simply relocating?
- If community services are currently funded through margins policy is trying to reduce, what mechanism keeps those benefits whole during transition?
- What safeguards will prevent abrupt policy shocks from triggering debt stress, deferred maintenance, workforce cuts and facility contraction?
- What credible non-gaming revenue pathways will be enabled, particularly through land use, redevelopment and growth-oriented diversification?

- What modern governance and regulatory framework will replace the current patchwork, so obligations are clearer, fairer and more enforceable?
- How will policy target genuine harm with precision without collapsing the broader community-benefit system Canberrans use every week?

Those are not rhetorical flourishes. They are the practical design tests the collection says government now has to answer.

13. Conclusion

The collected submissions make an argument that is both local and structural. Local, because clubs are woven into the daily life of Canberra's suburbs, sporting precincts and community networks. Structural, because the policy settings that shape their future reach across planning, taxation, utilities, licensing, governance, tourism, public safety and fiscal risk.

The underlying proposition is consistent from start to finish: Canberra will not build a stronger future for community clubs by pretending they are merely another category of licensed venue. Nor will it reduce risk effectively by pursuing shrinkage without replacement. The better path is disciplined transition - sharp on harm, honest about economics, and practical about what communities stand to lose if the settings are wrong.

That is why the collection keeps returning to the same themes: partnership not prescription, transition not shock, growth not managed decline, and community value not as a slogan but as a real policy asset worth protecting.

Final takeaway

- Community starts where people gather.
- Policy works best when it sees those places clearly.
- The challenge now is not to produce more rhetoric about transition. It is to build one that can actually hold.

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28 March 2026