

REVIEW OF ELECTRONIC GAMING MACHINE ARRANGEMENTS

EXECUTIVE SUMMARY

4 May 2006

Catholic Social Services Victoria (CSSV) sees the Review of Electronic Gaming Machine Arrangements as an opportunity to reflect on the lessons Victoria has learned from twelve years of Electronic Gaming Machines. This is particularly relevant to Church agencies that were probably the most vocal critics of the proposal for a casino and electronic gaming machines (EGMs) when they were first raised in the late 1980s.

On balance, CSSV's submission concludes that the overriding harm and the regressive form of this kind of taxation does not justify the continuation of the industry, as we know it.

Further, CSSV believes it is incumbent on the State Government to commit to a staged reduction in reliance on this form of gambling. This must be done prior to committing Victoria to a further term of EGMs in our State.

In tandem with a staged reduction, CSSV seeks a future licencing framework that emphasises appropriately stringent consumer protection regulation and ensures machine providers adhere to this framework.

CSSV, as a member of the Inter Church Gambling Taskforce also endorses their submission and in particular, the list of measures designed to increase consumer protection and harm minimisation. We also endorse the regulatory framework outlined in the submission by the St Vincent de Paul Society. This submission makes a case for the EGM industry to comply with a similar regulatory framework that governs the way in which the Victorian energy and water operate. We commend this thinking and approach for consideration by the Review.

CSSV's submission draws attention to several key considerations namely:

- The community do not want to see a continuation of the EGM industry in its present form and the majority of people want a marked reduction in the level and intensity of EGMs.
- The State Government does not value the industry apart from the revenue it derives from this form of gambling. It is therefore time to consider alternative revenue options that are more progressive and inspired than relying on a source of revenue that suggests an option of "last resort".
- As the EGMs are the most addictive gambling product available presently, Government must recognise its duty of care to citizens of Victoria.

WHAT HAVE WE LEARNED FROM TEN YEARS OF ELECTRONIC GAMING MACHINES IN VICTORIA?

Catholic Social Services Victoria's response to Review of the Electronic Gaming Machine Arrangements Post-2012 Issues Paper.

Opening comments

Catholic Social Services Victoria (CSV) welcomes the opportunity to submit to this critical review. As it is now more than ten years since the new Electronic Gaming Machines Industry (EGMs) was introduced into Victoria, it is indeed appropriate that the State Government, the Churches and members of the community use this opportunity to review what we now know about EGMs and to use this knowledge to ensure a safer, more responsible gambling environment. Given the impact EGMs have had on Victoria and the assistance that our agencies give to communities affected by the burden of this form of gambling addiction, our submission will focus solely on EGMs.

Catholic Social Services Victoria

Catholic Social Services Victoria is the peak body for Catholic welfare agencies in Victoria. Key objectives of CSSV include:

- Discerning and promoting within the Church and its agencies and ministries a contemporary vision and focus of the Church's social mission
- Representing its members and the Church in responding to social welfare issues so as to bring about social change in accordance with Catholic Social Teaching
- Resourcing the Bishops, Religious Institutes, Church agencies, ministries and other Church-based groups with regard to their social welfare pastoral responsibilities and ministries
- Encouraging collaboration in the promotion of opportunities for service delivery and mission development

CSSV has been and continues to be a member of the Inter Church Gambling Taskforce as the Catholic Archdiocese of Melbourne's representative. In making a separate submission, CSSV also endorses the strategies and recommendations contained in the Inter Church Gambling Taskforce submission.

Limitations of the review

While pleased to have an official avenue to comment on EGMs, CSSV believes the review framework has several flaws. While we recognise that the review is enabling contributions about what the future industry, post-2012 should look like, many in the Church and broader community are questioning the wisdom and viability of continuing this industry in Victoria post-2012.

The ethics of continuing with EGMs is not considered in the Review. Our submission will however raise ethical considerations, particularly given the concern that was expressed by the Heads of Churches in the lead up to the industry's commencement in the 1990s. The specificity of the questions posed in the Discussion paper suggests to the reader that the review is a re-licensing review rather than a broad-spanning review. We believe that as there is very little community support for this form of gambling¹, it is incumbent upon us a Church agency to continue to challenge the economic and social efficacy and desirability of this industry in addition to contributing advice on how a preferred EGM industry would operate.

We believe the specific questions restrict what submissions can comment on. We note however, that the paper allows submitting parties to also raise other issues or provide information they consider relevant to the scope of the review. We intend doing this in our response. We believe this is important to enable an examination of the fundamental concern that exists within the community about the ongoing EGM industry and whether it is socially responsible to continue operating it in the same manner and with the same level of intensity.

Catholic Church view of gambling in its various forms

We wish to outline in brief the Catholic Church's position on gambling to ensure CSSV's position in relation to the EGM review is clearly understood.

The accepted Catholic view of the act of gambling is that it is not in itself, immoral or wrong. It is a legitimate, recreational pursuit. By gambling, we mean the act of staking a sum of money in a game of chance, to be played under agreed conditions, for the sake of recreation. The agreed conditions are usefully described as:

- The stake belongs to the gambler and others must not have prior claim over the money necessary to fulfil the obligations to family and spouse
- The gambler must act freely without compulsion
- The transaction must be free of fraud
- There is equality between players.

Catholics see gambling's primary purpose as providing entertainment and entertainment or play is a normal part of life. There are many instances where this activity is seen as useful in building a sense of community. The fact that money is involved in this activity is not a problem in itself. The Catholic Church has over the years generated fund raising through gambling, mainly from bingo and raffles. Some Church agencies may consider accepting financial support from EGM operators to enable them to fulfil their agencies' stated mission. Catholic agencies are entitled to determine individually how they engage with certain industries. As the coordinating body for catholic agencies within Victoria, CSSV will always, when asked about these matters, advise caution given the compromises that can ensue with these arrangements.

¹ Roy Morgan Research (2000) *Seventh Survey of Community Gambling Patterns and Perceptions*, VCGA, Melbourne. (There are many surveys and reports, some commissioned by the State Government which highlight the high level of community opposition.)

Concern expressed by Churches prior to the introduction of the Casino and EGM venues in 1990s

In 1991 the Catholic Church joined with other Victorian Churches in expressing its concern about the introduction of a casino and poker machines without public discussion, despite the verdict of two Public Inquiries, Connor Report on Casinos and Wilcox Report on Poker Machines in 1982/83. The combined Churches' position was stated in a paper which contained the following key points:

“The introduction of very large gambling outlets or system of outlets such as a casino, a system of poker machines or tabaret into the community that is already sufficiently served by the racing industry and by Tattersalls would push the facilities beyond the level which all responsible persons regard as acceptable by the Government.”²

The report continues with a further point:

“The casino, poker machine and tabaret methods use pressure gambling because they create an environment which stimulates gambling behaviour beyond tolerable limit; they use mechanisms that make the play so unbroken that patrons scarcely have time to reflect upon how much they are losing; and they foster dangerous addiction by providing more frequent and regular opportunities for play than the older gambling media. The social costs to families and the community are enormous, though frequently not obvious on the surface.”³

This Review has afforded CSSV an opportunity to evaluate the misgivings raised in the 1991 Statement by Heads of Victorian Churches. Our Submission will outline what we have learned about the EGM industry. It will also advise on what could be done differently to ensure a safer, more responsible industry environment. In outlining what we now know, we will ask the State Government to demonstrate at the conclusion of the review period, what steps it will take to address concerns including its over-reliance on this regressive form of taxation.

The 1990s economic landscape that precipitated Victoria's decision to have EGMs

It is also important to note the extremely different political and economic landscape that existed in the early 1990s that shaped the State Government's “last resort thinking” about introducing an EGM industry. The global downturn in economies prompted many nations to consider “quick fix” approaches to revive drooping economies. Victoria was also dealing with economic realities brought about by this world trend as well as relatively serious budgetary problems in part due to fallout from Tricontinental and Pyramid Building Society collapses.

The landscape today is entirely different with Victoria experiencing sound and consistent economic growth for a number of years. It is important to consider these different realities. There is now even less reason to continue with an industry that while contributing substantial economic returns to the State Government, industry operators and shareholders, has at the same time, caused considerable human and economic harm to a large section of the community. Catholic Social Services Victoria contends that to continue along the same path

² Victorian Council of Churches, Gambling in Victoria, 1991

³ *ibid*

given the changed environment and what we know about the product, would be an uninspired, reckless and regressive one.

This has prompted CSSV to develop an overall call to the State Government to commit to, and set progressive targets for a staged reduction in the level of revenue received from EGMs over a 5 year period commencing at the expiration of the current licences. In tandem with this gradual phasing down of machine reliance, the State Government must ensure that the licencing regime that follows the current one is framed within a strong consumer protection regulatory model in recognition of the inherent harm in the EGM product.

Broad themes in our submission

The broad themes and concerns our submission will cover relate to:

- Increasing evidence and awareness of negative impact of EGMs, both individually and on community basis, particularly in socio-economic disadvantaged areas
- Call to account the State Government for its inaction in committing to a better and more progressive way to raise State revenue
- Need for re-framing of delivery of EGM industry to encompass comprehensive and rigorous consumer protection measures relevant to a product and industry that causes harm

Theme one: Negative impact of EGMs

What we now know about EGMs and the EGM Industry

1. EGMs are most addictive gambling product

There is a generally held view that approximately two percent of all adult Australians have gambling problems. A wealth of research shows that problem gambling is significantly higher for EGM gamblers, especially those who are regular EGM gamblers. The Productivity Commission national figure was that between 4.1 percent and 4.7 percent of all EGM players had gambling problems or between 14.8 percent and 22.6 percent of weekly players. The Productivity Commission further reported that 10.2 percent of Victorian EGM gamblers were regular players and 23 percent of them had gambling problems.⁴

There is clear evidence that is further supported by agencies providing gambling counselling, that EGMs are the most addictive gambling product. Further, our Catholic agencies which provide a range of counselling and support services including financial counselling have identified through their client profiles that EGMs have caused people who did not previously have gambling problems to become addicted to what they believed was a harmless, recreational pursuit. Sadly, many people turn to EGMs out of loneliness, looking for an easy way to alleviate stress. EGM venues are also popular haunts of people with intellectual disabilities and mental illness. This is in part due to the machines and venues requiring little or no engagement with other people.

⁴ Productivity Commission *Report of Australian Gaming Industry*, 1999, p 8.23

Many of the machines in venues in Australia are high intensity ones. In fact, Australia has the highest market share of high intensity machines after the United States. We have 20.4 percent of these types of machines.

Another indication of the high volume of use of the machines, which is directly related to the level of throughput of money through the machines, is that taxes on EGMs account for two-thirds of State gambling taxes. This is a stark indication of the enormity of the EGM industry in comparison to other gambling industries such as horse racing.

2. Concentration of EGMS in poorer areas

We know that EGMs are concentrated in low socio-economic status areas. A comparison of losses per head of adult population reveals that losses in two of Melbourne's least well off municipalities, Greater Dandenong and Maribyrnong, are five times greater than two of Melbourne's most affluent areas, Bayside and Boroondara.⁵ This does not make economic sense to anyone other than apparently, the EGM operators which derive most profits from these pools of lower than average income people. We know the harm that is caused to people from EGMs and recognise that money losses to wealthier people have a far less severe impact than when the same monetary loss occurs for a person for whom every dollar counts.

3. The product is unsafe

The "product" is one that exacerbates "loss of control". There needs to be an appropriate and strong consumer protection regulatory framework within which such an industry can operate. It is now substantiated that EGMs are an unsafe product because of the inherent, dangerous elements in the design of this gambling product. Players refer to the state they find themselves in after playing the machines for a while as being "in the zone". Players relate being captivated by the machines' mesmerising effects, sounds and music which have been cleverly designed to condition players' responses and lead to people losing control.

There is substantial evidence including the leaking of an internal report, which revealed the strategies developed by psychologists contracted by Tattersalls to find ways to "hook" people to machines. This was the subject of ABC Four Corners program on the EGM industry.⁶ There have also been testimonies from former venue staff turned whistleblowers about the pressure and predatory tactics employed by venues to keep players gambling over prolonged periods. These admissions have confirmed what many people have long suspected from hearing the accounts of venue behaviour from addicted gamblers.

The industry constantly commissions research to monitor what is going on in the mind of the customer. Games are continually revised to entice steady gamblers to gamble more and to also encourage non-players who are initially disinterested to begin to play. There is also disturbing evidence that suggests some games' motifs are deliberately selected which provide a comforting or calming response from players who have experienced forms of abuse.⁷

⁵ Doughney, J. (2001) *Socioeconomic Banditry: Poker Machines and Income Redistribution in Victoria*, Victoria University

⁶ ABC Four Corners, Episode on Tattersalls and pokies, October 2003

⁷ Falkiner, T.S. *New Age Religious Gaming Machines*, International Pokies Impact Conference November 2005, Adelaide

“That we have come to a point where government endorses gaining revenue from companies which study demographics and psychological behaviour in order to encourage people to gamble more, not only raises serious moral questions but calls for a more fundamental reassessment of government’s role in the revenue collection from gambling.”⁸

“There is a general consensus among psychiatrists that excessive gambling of all types leading to financial, social and psychological disorders should be referred to as pathological gambling. . . . In this behavioural disorder, the availability of gambling facilities and commercial pressures encouraging participation play very important roles.”⁹

“It clearly is a fact that if the facilities for gambling in a population increase, the total amount of gambling also increases. This affects all individuals in that population and inevitably leads to an increase in the number of those who gamble to such a degree that damage results.”¹⁰

4. Community overall, didn’t want and still don’t want EGMs

Apart from the duopoly of gaming interests, there is no section of the community expressing support for the continuation of the EGM industry. There is also deep community concern that EGMs hurt those who can least afford them.

Consideration of community views in this review. Considerable research and surveys indicate a high level of disquiet and opposition towards the level and nature of the pokies industry across Victoria.

According to the Victorian Casino and Gaming Authority (VCGA) research, 84 percent of Victorians believe that gambling related problems have worsened in recent years (56 percent strongly), and 83 percent believe that gambling is now a serious social problem (51 percent strongly). 78 percent believe that gambling is too widely accessible in Victoria (45 percent strongly), and 73 percent believe that the number of poker machines should be reduced (51 percent strongly) (Roy Morgan Research, 2000, p. 85).

These findings are confirmed by other recent research. In their study of 1,000 Victorians, Sharp and Romaniuk (1999), found ‘an overall high level of disagreement with the statement ‘increased gambling activity is good for the economy’ (61 percent) (Table 28). They also found 64 percent disagreed with the statement ‘there are sufficient controls and restrictions on the gambling industry’ (Table 32), while 78 percent agreed with the statement, ‘overall the costs of gambling far outweigh the benefits’ (Table 30).

KPMG (2000) also found widespread hostility to current poker machine policy settings, with over 90 percent of their respondents believing that gambling does more harm than good, and that only 10 percent felt that poker machines had been good for their local area (2000, p. 108). NCS Pearson found overwhelming support for measures designed to lessen intensity of play: 68 percent of 400 respondents agreed that poker machines should be banned from accepting notes, 71 percent felt that poker machine players should be forced to take regular breaks from gambling; 78 percent agreed that ATMs should be banned from gaming venues and 68 percent felt that the maximum number of lines that can be played with each push of a button should be restricted to five (*Herald Sun*, 22 June, 2001, p. 3).

⁸ Productivity Commission *Report of Australian Gaming Industry*, 1999, p155

⁹ The United Kingdom Royal College of Psychiatrists (2003), *Submission to the Joint Committee on the Draft Gambling Bill*

¹⁰ *ibid*

Theme two: Identifying alternative revenue stream

1. There is always another way: Finding an alternative revenue source

If revenue for the State Government is the overriding reason for the continuation of this industry, what are the alternatives revenue streams that could be considered if the industry was to be discontinued or reduced over a staged period?

The Inter Church Gambling Taskforce commissioned Swinburne University to consider this issue.¹¹ The Taskforce was hoping that the State Government could be encouraged to scale back the level of EGM activity prior to 2012. These recommendations are still valid and worth serious consideration by the State Government. Below are listed a number of approaches that could be taken to reduce the State Government's over-reliance of EGM taxes:

- Revenue from GST will become revenue positive for the States 2007/08. At this point, revenues will begin to flow back to Victoria ensuring a healthier budget balance statement. These funds could be set aside to help reduce the State's reliance on gaming taxes.
- As a first step that the Government must commit to an identified staged reduction in reliance on gaming taxes. The Taskforce believes that this must come from the pool of taxes from EGMs because of their greater harm factor.
- As Victoria's tax take from gaming taxes is much higher than other States, that Victoria set a level commensurate with an all States average.
- The State could as a show of good faith, commit to a one-off contribution from the State's budget surplus towards this aim.

2. Consideration of alternative, less harmful forms of gambling taxation

In the cause of reducing harm to the community and enabling a more responsible gambling environment, CSSV is open to consideration of a boosting of other forms of gambling which could then partly replace the tax take from EGMs. Given the experience of South Carolina outlined below, we urge the State Government to consider examining the feasibility of establishing a state-run lottery. Evidence suggests that lotteries are far less addictive than EGMs and can generate substantial revenue. The State Government would also, in establishing a new gambling enterprise, be in a better position this time around in ensuring the maximum benefit was directed to the broader community.

Theme three: Need for Strong, Consumer Protection Framework

1. Government only maintains industry because of revenue

There is no obvious reason the State Government retains EGMs other than revenue. Government has never claimed that there is any community benefit in having the industry.

¹¹ Hayward, D. and Klinger, B. *Breaking a nasty habit? Gaming policy and politics in the state of Victoria*, Commissioned by Inter Church Gambling Taskforce

EGMs are certainly not filling a vital social void for citizens. EGMs have in effect become a sign that this State Government is either out of step with community thinking or short on inspiring ideas for revenue raising.

There are many examples of overseas countries heeding the warnings about increasing gambling addiction from EGMs and introducing measures designed to reverse the harm. Significantly, this does not mean that revenue levels necessarily diminish. An interesting case in point is South Carolina, which decided to ban EGMs in 2000 after 14 years of Government reliance on them. In 2002, a new form of gambling began, the state-run lottery. In its last year of operating, the EGMs industry generated \$1 billion in profit to the operators and paid \$65 million in fees to the state. In contrast, the state lottery in 2002 had \$627 million in sales and generated \$151 million to the state.¹²

The Canadian province of Nova Scotia eliminated 2,000 of its 3,500 machines, citing problems of addictive behaviour and underage gambling. The Netherlands legalised EGMs in 1988. This led to a significant increase in the number of gambling addicted people from several thousands to between 100,000-200,000. In early 1994, the Dutch Parliament called for the removal in 1998 of all 64,000 EGMs in all stores and other neighbourhood facilities.

CSSV believes the economic, social and harm minimisation feasibility of a state-owned lottery could be considered. This is the kind of compromise position that could and should be considered by Government as a genuine willingness to consider alternative revenue options that cause less harm.

2. Consumer protection and harm minimisation measures

CSSV is now outlining a range of measures that it believes, if implemented, could greatly increase the level of responsible gambling in Victoria. We wish to emphasise that a fundamental issue to be addressed in all considerations relates to **accessibility of this form of gambling**. This issue must be addressed as a matter of priority in this review. The concept of accessibility also applies to the community and experts' access to data and information currently not released by the industry, which would greatly benefit research, community awareness protection of the inherent risks with the machines.

Consumer protection and harm minimisation measures are similarly endorsed by the Inter Church Gambling Taskforce. We refer the Gambling Licences Review to the Inter Church Gambling Taskforce submission, which spells out these measures in greater detail. We also endorse the comparison of the EGM industry to the Victorian energy and water industries in the St Vincent de Paul Society's submission.¹³ The submission makes a strong and substantiated case for the EGM industry to comply with similar codes, practices and regulations as other industries. We further believe that given the inherently harmful elements of EGM industry, the State Government would be prudent in considering elements of other industry's regulatory codes, such as the automobile and pharmaceutical industries.

Response to discussion paper question 4.1

¹² Bridwell, R. 2003 *South Carolina Video Poker Study*, University of South Carolina

¹³ St Vincent de Paul Society of Victoria, May 2006 Submission to the *Electronic Gaming Machines Licencing Review*

4.1 What should be the regulatory approach to achieving responsible gambling objectives in the post-2012 gaming machine industry structure and licence arrangements?

The EGM operator and/or venue licences should require the operators and venues to adopt a culture of responsible gambling and should in no way limit the Victorian Government in imposing legislation and regulation to foster and enforce responsible gambling and reduce problem gambling in the Victorian community. The approach must be developed within a framework, which minimizes harm, particularly the disproportionate harm felt by disadvantaged communities.

CSSV also wishes to emphasise that maximum gains must be felt by the community rather than the industry operators.

If the Government adopts operator licences with a fixed licence fee per EGM for the operator, then the operator's licence should contain bonus payments from the Community Support Fund for the operator achieving certain measurable and verifiable responsible gambling objectives, such as a reduction in the number of people having gambling problems related to EGMs in the community or a reduction in the amount of revenue coming from people with gambling problems.

There is a need for a comprehensive package from the Victorian Government to significantly reduce the level of EGM related problem gambling. No single measure will be sufficient to seriously decrease the level of EGM related problem gambling in Victoria. Only a comprehensive package can be expected to achieve true harm minimisation.

The Victorian Government should implement the set of harm minimisation measures outlined in the Inter Church Gambling Taskforce's submission. These are categorised into measures that:

- reduce the rate of loss on each EGM
- address a range of access issue, for example, access to cash in gambling venues
- rely on cognitive decisions by the gambler.

However, we note that some of the measures will be more effective at reducing harm from electronic gambling machines than others. Thus, the four key measures that should be given highest priority are:

- Removal of ATMs from gambling venues
- Ban on note acceptors
- Introduction of smart cards to facilitate pre-commitment, promote responsible gambling behaviour and increase the effectiveness of self exclusion measures, and
- Legislation for any change to EGMs proposed by industry to be researched and permitted only if it can be proved that it will not increase the level of problem gambling.

Conclusion

CSSV is aware of the concerted effort of many Church and community agencies to take up the opportunity afforded by the Review, to present their cases for changes to the current EGMs licencing arrangement. We hope that the State Government will be open and receptive to these views. We also wish to emphasise the legitimacy and authority of these agencies that are often at the frontline, dealing with the human loss and tragedies associated with EGMs, to speak on these issues.

We ask that the State Government have the courage and inspiration to re-consider its need for revenue in light of the regressive nature of EGMs and the fact that there is no other legitimate reason for continuing to be so reliant on this industry. It is essential that the State Government approach the review acknowledging that there is also another way. This is what CSSV sincerely asks of the Review process; an open, transparent readiness to consider genuine alternatives.

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