

Player Card and Cashless Gaming: Public Consultation Paper

October 2024

Introduction

My fundamental position is that electronic gaming machines (also referred to as EGMs, poker machines or “pokies” in this submission) are a social and economic drain on Tasmania and should be removed altogether from hotels and clubs. In other words, pokies are a net negative on our society and we would be better off without them. However, although the above point needs to be stated, I am a pragmatist so will consider any reform that genuinely mitigates the harm caused by pokies, and I believe that the introduction of a universal, mandatory card-based system for EGM use is a significant harm reduction measure.

My responses in this submission are informed by: the considerable body of publicly-available evidence on effective gambling harm reduction¹; the views of my constituents many of whom live in a suburb with the highest gambling losses in Tasmania² – and, not coincidentally, an area with among the lowest incomes in the state; and by other stakeholders including Anglicare Tasmania, which provides gambling and financial counselling and conducts research into gambling through its Social Action and Research Centre (SARC).

Throughout this submission I will refer to EGM ‘users’ rather than ‘players’ to reflect the fact that poker machines are dangerous products designed to addict.

Responses to questions

What issues should be considered around how a player can use their carded play account and access their account information? What information should a player receive from a carded play system and how?

I support the proposed registration process for obtaining a card.

EGM users should be able to obtain information about their account both online and should be able to request a printed copy anytime at a venue. This is particularly

¹ See for example Monash University’s [Gambling and Social Determinants Unit](#)

² [Tasmanian Department of Treasury and Finance, Gaming machine expenditure by municipality](#)

important for the many Tasmanians who don't have affordable access to the internet and/or have trouble navigating online.

Below I address the kind of information a carded system should provide EGM users.

What issues should be considered for other programs, such as membership or loyalty schemes, that might use the same player card?

The Consultation Paper does not propose how venue memberships or loyalty schemes will operate with the Player Card. It's important to note that such schemes are designed to increase use of EGMs and consumer spending. There is also evidence that EGM users who have self-excluded due to gambling harm have been targeted by these schemes. The Tasmanian Liquor and Gaming Commission (TLGC) should therefore ensure that the planned review of the Responsible Gambling Code of Practice ensures that interaction of the Player Card with membership and loyalty schemes upholds the Code's aim of minimising harm.³

A certification process will be required for higher loss limits requests. How stringent should this certification process be? What evidence of financial capacity should be provided to support higher loss limits requests?

I support the proposed default and threshold loss limits.

An application to increase loss limits should be assessed by someone with the relevant training and skills. The applicant should be required to:

- Show evidence of income
- Show evidence of debts
- Complete a gambling harm checklist, and
- Be provided with contact details of gambling support services.

I do NOT support enabling EGM users to link their Card account to their bank account – evidence suggests that requiring EGM users to interact with a human to access funds is a harm prevention measure.

At what points in the player card gaming process should a person's identity be verified, for example for card re-issue, when changing limits, loading funds onto cards or receiving payouts?

³ [Tasmanian Liquor and Gaming Commission, Responsible Gambling Code of Practice](#), 1 July 2023, p. 10

Kristie Johnston MP

Independent Member for Clark

Card users should be required to verify their identity at card issue; reissue; when loading funds onto cards; when requesting an increase in loss limits; and when receiving payouts.

Should player activity statements be mandatory or optional? For example, players can opt-in or opt out of receiving statements. How often should player activity statements be generated? What information would you like to see on a player activity statement?

User activity statements should be mandatory. They should be provided monthly and include:

- Amount spent
- Amount lost
- Amount won
- Net position
- Time spent using the card

An annual statement should be provided with the same information.

Statements should NOT be provided if the card has been inactive for the statement period. This can help protect people at risk of gambling harm by not providing a reminder or prompt about gambling.

Statements must not include any promotion or advertising.

All statement should include approved messages about the harms caused by gambling and links/contacts for support.

In addition, information about a user's activity should also be displayed on screen when they sign out of a machine. Similar to the display on ATMs this should include their losses against their daily, monthly and annual expenditure limits.

What issues and requirements should be considered in relation to the collection, storage, access and use of information and data collected via the PCG system?

Information from the Player Card should not be used to inform advertising and promotion.

From a harm minimisation perspective, how long should a delay be before an increase in a loss limit comes into effect? That is, how long should a cooling off period last?

I support the proposed 24 hour cooling-off period after an increase in loss limit.

Kristie Johnston MP

Independent Member for Clark

Should there be a limit on how much money can be loaded into a player account? Should there be a limit on the maximum amount that can be transferred to an EGM from a player account? When a player collects funds, should there be an ID check as well as entering their PIN? Should there be a maximum amount permitted for cash payouts for small wins?

- There should be a limit on how much money can be loaded onto an account. This should be the maximum annual loss limit set by the user (the default would be \$5000).
- There should be a limit on how much money can be transferred to an EGM from an account. This should be the maximum daily limit set by the user (\$100 for those set at the default limit but could be higher for those who increase their loss limits).
- Identity verification should be required when collecting funds, in addition to entering a PIN.
- There should be a maximum amount of \$500 for cash payouts, payable by cheque or electronic transfer. This would aid in the prevention of money laundering.⁴

Other feedback

- Exclusion should mean the Player Card cannot be used when an exclusion is activated and should ideally occur in real time (ie no delay between a user reaching their maximum loss limit and being locked out of EGM use).

Conclusion

I support the introduction of a mandatory pre-commitment player card for Tasmanian poker machines. This would be the most effective consumer protection measure introduced in any Australian jurisdiction and, so long as poker machines remain in pubs and clubs, will go a long way to reducing the harm caused by this deliberately harmful product.

For more information contact:

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⁴ See for example <https://www.crimecommission.nsw.gov.au/final-islington-report.pdf>