

16 October 2024

Tasmanian Liquor and Gaming Commission
C/O Department of Treasury and Finance
GPO Box 147
HOBART TAS 7001

Sent via email: player.card.gaming@treasury.tas.gov.au

Player Card Gaming project

Dear Sir/Madam,

As a well-established and community-focused venue, the Shoreline Hotel provides a range of services that contribute positively to the social fabric of our local area. From our popular dining options to our much-loved community events, we play an integral role in the daily lives of residents and visitors alike. The operation of our electronic gaming machines (EGMs) is a key part of our business, helping to sustain these services while contributing to the employment and economic vitality of Hobart's Eastern Shore.

However, we recognise the importance of minimising harm from problem gambling and are committed to supporting efforts that target and assist individuals who may be at risk. With this in mind, we are submitting our response to the various questions posed in the Player Card and Cashless Gaming Consultation Paper. We believe the proposed system will disproportionately impact casual and social gamers while introducing unnecessary burdens for both players and venues like ours.

1. What issues should be considered around how a player can use their carded play account and access their account information?

The primary issue is the excessive burden placed on casual, responsible gamers who don't need or want such levels of oversight. Mandatory accounts require every player to surrender personal data and be subjected to unnecessary tracking, which invades privacy and autonomy. The added complexity of managing accounts, PINs, and limits could deter recreational players, reducing enjoyment and participation in gaming. Instead of mandating player cards for all, these measures should be voluntary and targeted at problem gamblers only.

Casual gamers should not have to register or manage accounts for a harmless leisure activity.

2. What information should a player receive from a carded play system, and how?

Players should only receive the information they explicitly request. While detailed statements on losses and gaming history may be useful for those who choose to set limits or seek self-exclusion, providing this to all players, including casual gamers, is an unwarranted intrusion. Gaming is a form of entertainment, and players should not feel like their enjoyment is being tracked and monitored like a high-risk financial investment. Any information provided should be completely optional and initiated by the player, not enforced by the government.



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

Loyalty programs are designed to enhance patron experience by rewarding patronage, not by tracking and restricting their actions. Using the same card for both purposes risks blurring the line between incentives and surveillance. It would undermine player trust if their loyalty card, which is supposed to benefit them, is repurposed to monitor and control their behavior. Players should have the freedom to opt-in or out of any card-based system without being forced to combine it with a regulatory tool.

4. Should player activity statements be mandatory or optional?

Player activity statements should be strictly optional. Forcing these statements onto every player not only invades privacy and wastes resources but assumes that everyone requires oversight. The majority of players engage with EGMs responsibly, and treating them like potential problem gamblers is an overreach. Those who wish to receive statements can opt in but mandating them across the board is excessive and creates unnecessary friction between the venue and players. A possible exception might be for self-excluded gamblers.

5. How often should player activity statements be generated?

If player activity statements are implemented, they should only be generated at the request of the player, not at regular intervals. Automatic generation of these statements suggests that players need constant monitoring, which is both patronising and intrusive. Players who are concerned about their gambling behavior can request such statements at their discretion; others should not have to deal with unnecessary paper trails reminding them of their gaming activity.

6. What evidence of financial capacity should be provided to support higher loss limit requests?

Requiring individuals to provide financial evidence to justify how they choose to spend their money is a step too far into personal freedom. Players should not be forced to disclose financial details just to enjoy a gaming session. Those who gamble responsibly should have the autonomy to set their own limits without having to satisfy bureaucratic demands for "proof."

7. How long should a delay be before an increase in a loss limit comes into effect?

Delays should be minimal, if implemented at all. Imposing waiting periods before allowing players to increase their limits again treats them as incapable of making informed decisions. Gaming is an adult activity, and adults should have the right to adjust their limits according to their personal financial situations without the government enforcing arbitrary "cooling-off" periods. This measure would only serve to frustrate responsible players who are fully capable of managing their finances and choices.

8. Should there be a limit on how much money can be loaded into a player account?

There should be no limits on how much money a player can load into their account. Restrictions on player accounts imply that individuals cannot be trusted with their own funds, which is patronising. Adults should have full control over how much they wish to load or spend. Setting arbitrary limits does nothing to prevent harm for problem gamblers, who will find ways to bypass them, and instead punishes responsible players who have no issue managing their gaming. This type of control could also serve to push



patrons towards online gambling, where no such restrictions exist and the economic returns from the activity are transferred offshore as a result.

9. Should there be a limit on the maximum amount that can be transferred to an EGM from a player account?

There should be no limit on how much can be transferred to an EGM from a player account. Gaming is a personal choice, and players should have the freedom to spend as much or as little as they like. Imposing restrictions on transfers is an unnecessary interference with personal freedom. People are capable of managing their own finances, and restricting transfers will only frustrate players, reduce enjoyment, and push them toward alternative, potentially less regulated offshore platforms.

10. Should there be an ID check as well as entering their PIN when a player collects funds?

Requiring both an ID check and a PIN for collecting funds is excessive. The PIN itself should suffice as a security measure, as it is already a recognised standard for protecting personal accounts. Adding another layer of verification is redundant and will only create unnecessary delays and frustration for players. Trusting players to manage their own funds without constant oversight is essential in maintaining a respectful, efficient system.

11. Should there be a maximum amount permitted for cash payouts for small wins?

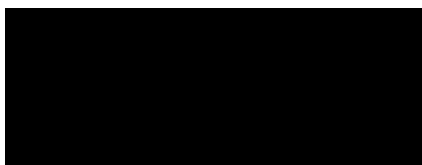
No, there should not be a maximum amount for cash payouts, especially for small wins. Imposing restrictions on how players collect their winnings is another unnecessary intrusion into their financial autonomy. Players should be allowed to collect their funds in whatever form they choose without the government dictating arbitrary limits. Such rules add complexity and reduce the player's enjoyment of the gaming experience.

As you will see from our responses, we have a particular perspective that individuals should be trusted to make their own decisions. Government regulation should focus on supporting those who genuinely need help without imposing unnecessary and burdensome restrictions on the overwhelming majority of responsible players and business operators.

Technology such as CCTV with facial recognition software exists now and can be implemented to specifically assist problem gambler harm reduction. The introduction of blanket measures which restrict freedom of choice and privacy under the guise of "harm minimisation" is an overreach and an unnecessary intervention in personal liberty.

Thank you for your attention to this matter.

Yours sincerely



Robert Inches
Company Secretary
Joswall (Australia) Pty Ltd
trading as **The Shoreline Hotel**



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