

## Submission about the Player Card for Pokies

By Margie Law

### Introduction

I have 21 years' experience of Tasmanian-based research and advocacy about gambling. Throughout this time, poker machines have always been the lead cause of social and economic damage caused from gambling, as reported directly to me through my research and as shown through the Social and Economic Impact Studies.

I was involved in 2021 in the parliamentary debate that led the Government to requesting the Gaming Commission to implement a mandatory cashless card-based system for poker machines in all venues in Tasmania. I support the implementation of the player card, as proposed by the Ministerial Direction in September 2022. This is the first time a policy of the Tasmanian Government would lead to meaningful consumer protection that would both assist those already suffering and limit the likelihood of new harm developing.

I understand this Consultation is not about the policy but about implementation and I expect the Commission to continue on its path of implementation despite the recent changes to ministerial responsibilities related to gambling and comments made by Government members about this policy.

I am available to meet with the Gaming Commission to discuss this submission and I will also make my views known directly to the Government.

My comments on the Consultation Paper are as follows.

### Player Card Limits

I congratulate the Gaming Commission for the limits they have proposed for this system. I think the daily, monthly and annual limits are appropriate and likely to be effective in minimizing harm. I also support the time limits and the breaks in play. All of these features are consistent with numerous studies of harm minimization measures. While their explanation of how to use "deposit limits" assumes that people can win while gambling on races, Betfair supports the setting of limits as "a crucial aspect of responsible gambling.... [as it] ensures that you remain within your predetermined budget, preventing impulsive and excessive losses" (<https://www.betfair.com.au/hub/education/setting-a-deposit-limit/>). Limit setting is used by counsellors as a tool for people who are being harmed by gambling, but with the knowledge that voluntarily limiting expenditure is extremely difficult.

I therefore support the limits as proposed – for daily, monthly and annual loss limits, time limits and breaks in play and for all of this to be mandatory and automatically imposed by the card system when the limits are reached. I support the limits as proposed on pages 6 and 7 of the Paper.

As for increases to loss limits, I support a cooling off period because, as counsellors have told me, the person who has a gambling problem is not in control in the moment and if the person doesn't have a gambling problem, then a cooling off period would not hurt them. That is, I see no reason to not have a cooling off period.

### Player Card Registration

The Player Card must be mandatory, universal and cashless. I am worried that the gambling industry is working behind the scenes to water down the system as proposed by the Gaming Commission and described in the

September 2022 Ministerial Direction. If it is watered down, it would prove that the Government cares more about an exploitative industry than everyday Tasmanians.

I think the registration process proposed in the Consultation Paper is sound. I note that when you apply for an ID card at Service Tas, they collect your ID documents but do not issue a photo card on the spot, rather it is mailed to you. In contrast, a photo card at the Aquatic Centre (which does not need any ID verification process) is issued on the spot with a machine at their service desk. I think it would be possible to have such card machines at all venues but only if staff were trained and efficient processes were established. An alternative would be the card is mailed to the applicant's address. Given that poker machines are not an essential service, I see no reason applicants should not have to wait for their cards to arrive in the post so that proper checking can be carried out and this would also alleviate the need for every venue to have card issuing machines.

I think ID should be checked when the person applies for a card and if the card is reissued. If a person wants to increase their limits, I also think ID should be checked so we can be confident that the card is being used by the person seeking the increase. If we are truly wanting to limit harm, ID should also be checked at the time of payouts in a venue, again so we can check the card is being used by the intended user.

### Player Accounts

One of the benefits of a card-based system is that the player can have access to so much more information and therefore make much more informed decisions. I support the provision of information to players such as amount spent (lost), time spent (lost), dates gambling took place, monthly losses, annual losses and deposits made to the Player Account and its balance. This information should be available in the Player Portal but it should also be provided to people via a Player Activity Statement in a similar way that banks let us know what we have spent and when. The provision of this information should be mandatory.

In addition, there is no reason that the poker machine should not have a live count for the player – of the time and money they have spent in the current session.

I think the maximum amount that should be allowed into a Player Account is the Annual Loss Limit. The maximum amount allowed to be loaded into a poker machine should be the Daily Limit. This would see a reduction from the current allowance of \$500 (which is equal to the monthly limit). Given that the default limit would not allow the \$500 to be lost in a day, there is no reason for that to be allowed to be loaded on.

I have never supported membership and loyalty schemes because from my consultations with people harmed by gambling they only serve to suck people into thinking the industry cares about them. Unfortunately, the thousands of Tasmanians harmed by gambling realise too late that they have been sucked in. If these schemes continue to be allowed (although I do not know why we should allow them and I think we should consider how we would feel about membership and loyalty schemes for cigarettes or alcohol), then I ask the Commission to review the rules and requirements for the schemes so that the Player Card has the best opportunity to be effective.

### Exclusions

I hope the Player Card is immediately disabled when the person is excluded. This needs to be real-time.