



Submission to the Parliamentary Committee on Cashless Gaming Cards

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To: The Tasmanian Liquor and Gaming Commission

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Subject: Submission on Cashless Gaming Cards

Tas Baptists Ongoing Support for Gambling Reform and Cashless Player Card.

Tasmania's Baptists have for a long time been advocates for gambling reform in our state. Poker machines, in particular, target disadvantaged communities. The West Coast (the most socioeconomically disadvantaged LGA) has 141 poker machines over 10,000 and an average annual losses of \$427 per capita. Contrasty Hobart, (a socioeconomically advantaged LGA) has only 24 poker machines per 10,000 and average annual losses of \$64 per capita.¹ Gambling addiction affects multiple facets of life including housing and food security and mental health and wellbeing.

Tasmanian Baptists support the Government's commitment to implement a universal player card system for poker machines in 2022.

This implementation is a positive action that will reduce harm for problem gamblers and have a minimal impact on those who gamble recreationally.

Issues for which the Commission is seeking comments.

1. Registration for player cards.

What stage should a person's identity be verified?

- The proposed registration process is good.

- This process will provide transparency, improve traceability and empower players to manage their gambling habits more effectively, reducing the risk of problem

¹ Anglicare Tas, *The Poker Machine Card. Simple As.* (<https://www.anglicare-tas.org.au/the-poker-machine-card-simple-as/>)

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gambling.²

- ID's should be checked at card issue, card reissue, when requesting an increase in loss limits, and when receiving payouts. Rationale: interacting with a human is good practice for minimizing harm.

2. **Player Activity Statements.**

Should activity statements be mandatory or optional, how often should they be generated and what information they should contain?

Requiring players to report their activity each year is an important way to encourage responsible gambling. By including information on the amount lost and time spent at machines, players can gain valuable insights into their gambling habits, which may encourage more mindful play.

- Excluding advertising or promotional content ensures that the focus remains on player welfare, while incorporating approved messages about the harms of gambling can help raise awareness. This approach not only supports responsible gambling practices but also fosters a more informed and cautious gaming environment. Overall, these measures could significantly contribute to reducing the negative impacts associated with gambling.

3. **Limit setting (pre-commitment) of player cards.**

Should there be a cooling off period before an increase in a loss limit comes into effect?

What evidence of financial capacity should be provided?

- Yes. Cooling-off periods are indeed a valuable consumer protection tool. By giving consumers time to reflect, cooling-off periods can reduce the likelihood of decisions driven by immediate emotions or short-term gains. This is especially relevant in gambling contexts, where the thrill of the moment can overshadow long-term consequences. Implementing cooling-off periods can help individuals align their actions with their long-term goals and well-being, ultimately, gaining better control over their gambling.

- The proposed 24-hour period seems to be sufficient for the player to consider whether their decision was made without proper consideration.

- Yes, Evidence of an ability to afford losses without financial stress should be required when applying for higher loss limits.

4. **Funds in and out of player cards/accounts and machines**

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

Should there be a limit on transferring from their account to a machine?

Should there be an ID check (as well as PIN) when collecting funds?

What should the maximum be for cash payouts?

- Yes. The maximum amount loaded into an account should be the annual loss limit

² Alliance For Gambling Reform, Countering Arguments against Gambling Cards for Poker Machines with Mandatory Pre-Commitment. <https://www.agr.org.au/cashlessgamblingcards>)

set by the player. The default limit is \$5000.

-Yes, The Maximum amount able to be loaded into a machine should be daily loss limit set by the player. The default amount is \$100

-Yes, when a player collects funds there should be an ID check as well as a check they are not excluded.

- Cash Payouts should be limited to \$500 or a lesser amount set by the user.

5. Membership and loyalty schemes

What issues should be considered for membership and loyalty schemes?

- Membership and loyalty schemes often encourage increased spending, and manipulate consumer behaviour to benefit the industry. The Priority of this Cashless card should be player and community welfare. It's vital to ensure any membership or loyalty schemes align with responsible gambling practices and are standardised across hotels, clubs, and casinos, ensuring these schemes support harm minimisation.

6. Exclusions

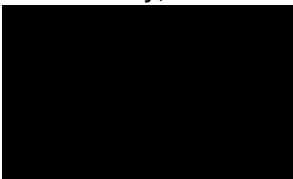
- Linking the player card to system-based exclusions is an effective way to enhance responsible gambling. When an exclusion is activated—whether self-imposed, venue-based, or third-party—access to the card should be restricted. Additionally, incorporating features that encourage short-term breaks can help players manage their gambling more effectively. These measures would promote safer gaming environments and support players in making more mindful decisions.

Conclusion

Tasmanian Baptists applaud the action of the government in committing to implement a universal player card gambling system.

We advocate for the adoption of cashless gaming cards to be implemented across all gaming facilities, including casinos, by December 2025.

Sincerely,



Stephen Baxter
Mission Director, and on behalf of Tasmanian Baptists

Compiled by



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