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GIS Response to the Tasmanian Player Card and Cashless Gaming Consultation Paper

As an organisation with a focus upon consumer perspectives through lived experiences of gambling harms, the Gambling Impact Society NSW (GIS) is pleased to contribute to the consultation with regards the implementation of a Gambling Card in Tasmania. This is particularly important as Tasmania is the first jurisdiction in Australia to legislate the implementation of such a consumer protection tool and in doing so, leads the nation in gambling harm endeavours. It is therefore important to get this right from a consumer perspective.

From the GIS perspective, we heartily support the introduction of a Cashless Gambling Card for poker machine gambling across Australia. This should be part of a National Approach to reducing gambling harms and increasing consumer protection from what has been well evidenced as high-risk gambling products (Roberts, 2021). The ability to set loss and time limits away from the intra-action of the machines was identified as far back as 2003 (Dickerson, 2003). It is therefore imperative that governments expedite actions to bring these recommendations to fruition.

The details already considered by the Tasmanian government, as illustrated in the consultation paper, are worthwhile in ensuring a system that is both responsive to consumer protection and manageable by both industry and regulators.

Our comments provided here, are to further inform debate in particular areas as follows:

Registration for the Gambling Card

Note we do not support the naming of this consumer protecting card as a “player card” as we believe the correct use of the term ‘Gambling Card’ helps inform consumer consent and awareness about the use of gambling products.

The GIS considers the proposed registration process for this gambling card as both practical and manageable.

We support the checking of personal identification at card issue. We also suggest that ID should be checked at card reissue, and when requesting an increase in loss limits, and when receiving pay-outs.

We also suggest the opportunity to include finger-print identification as part of the recognition system for registration and card and machine use. These forms of ID are already in place in terms of entry into some Clubs in NSW, and other businesses. We see advantages to card use integrity, by including this into the model with a view to reducing card swapping etc.

We support human interaction as part of the registration process rather than online as we are aware human interaction has benefits in reducing harm.

Pre-Commitment

The research of Dickenson (2003) and the 2010 Productivity Commission Inquiry into Gambling indicated the setting of both time and money limits are advantageous to reducing gambling harms. We therefore consider the inclusion of both these facilities as mandatory. Time limits should not be a voluntary option

Poker Machine User Accounts

There should be limits on how much money can be loaded into a poker machine users account. The maximum allowed into the account should be the maximum annual loss limit set by the poker machine user

The default limit for this would be \$5000.

There should be a limit on the amount that can be loaded onto a machine.

When a poker machine user collects funds there should be an ID check as well as a check they are not excluded

Loss Limits

National public inquiries (Productivity Commission 1999 & 2010) and research studies have indicated poker machines are one of the most addictive and harmful gambling products (Schull, 2012, Roberts, 2021). Australians lost \$31.5 billion 2022-23 with over \$16 billions of this on poker machines. The GIS supports the proposed default loss limits as part of a consumer protection model within a public health frame and see no reason to support a facility to permit changing loss limits beyond the default settings proposed.

Mandatory Breaks in Gambling

We support the concept of mandatory breaks in gambling and the suspension of card use in order reinforce the need for rational time out from the activity. However, we are aware that reserving machines reinforces the illusion of control over the gambling process, and this mechanism is a contributor to gambling harms. We therefore do not support any form of machine reservations.

Gambling activity statements

Note we do not support the naming of this consumer protection information tool as a “player activity statement” as we believe the correct use of the term “gambling” informs consumer consent and awareness about the use of gambling products.

Gambling activity statements should be mandatory and issued monthly and need to include information on limits, times spent gambling, amounts won and lost.

The statement must not contain any advertising or promotion but must contain approved messages about the harm caused by gambling.

Increasing Loss limits

Cooling off periods are good consumer practice. For example, Consumer Affairs Victoria explains the benefits of cooling off periods for situations where a consumer may be likely to make “short-sighted or emotion-based decisions” (“Cooling-off periods in Victoria: their use, nature, cost and implications”, page 12). Further, “Consumers can make poor choices that they later regret when there is a divergence between their short-term and long-term preferences” as a result of “availability bias”, “hyperbolic discounting” (where the consumer is more focussed on short-term gains or losses than the long-term, based often on immediate pleasure overcoming delayed or long-term regret), or “hot states” (decisions made in the heat of the moment) (page 12).

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

The default and threshold loss limits should be implemented as proposed by the Commission as they were informed by national and international research as well as the 2021 SEIS.

Collecting Funds

The amounts loaded into the poker machine users account and then transferred to the EGM should be linked to the maximum loss limits for the time periods i.e. reflect the loss limit decisions.

An ID check as well as the PIN is warranted for collecting any funds.

Cash payouts for small wins should be limited

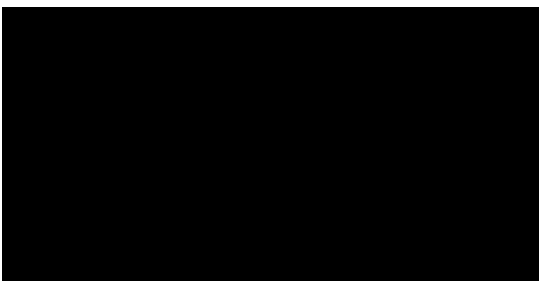
Loyalty Membership and Gambling Card

Membership and loyalty schemes are ways for an industry to push consumer spending in a particular way, to benefit the industry. Gambling cards **should not be linked to loyalty systems.**

Exclusions and the Gambling Card

The gambling card should be linked to system-based exclusions such that the card cannot be used when an exclusion is activated. Exclusions should continue to be activated by self, venue or third parties. Poker machine users who choose to exclude or are excluded should be required to surrender their gambling card it should not be left to the consumer to set their limit to zero. Anyone who is excluded should not be holding a gambling card.

Yours faithfully



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18/10/2024

References:

Dickerson, M. G. (2003). Exploring the limits of “responsible gambling”: Harm minimization or consumer protection? *Gambling Research Journal of the National Association for Gambling Studies Australia*, 15, 29-44.

Roberts, K. (2021). Welcome to Clubland: Exploring sociomaterial dimensions of poker-machine gambling harms in community-clubs in New South Wales Australia, Doctor of Philosophy thesis, School of Health and Society, University of Wollongong. <https://ro.uow.edu.au/theses1/1378>

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