

Context

This response has been drafted by the hotel and club venues in Tasmania who operate Electronic Gaming Machines (EGMs). It is the collective view of the 90 venues who have endorsed this document and provides feedback on the proposed Player Card Gaming (PCG) System and Cashless Gaming Systems.

Our industry has faced years of uncertainty since 2018 when we were told we would be transitioning to an owner operator model. Following significant up-front capital costs to transition we continued to experience uncertainty, as the new monitoring operator took months to get machines connected to their system and the system to a stable operational position (one regional venue took over 5 months before they were able to fully operate). If it wasn't for the support of the Tasmanian Hospitality Association, and the information they shared through this, our businesses would have been lost. Now with the owner operator model barely operating as anticipated, the uncertainty of a card system that is meant to start in 12 months, that has not been explained, has not been costed, and has no roll out plan or support for industry is ludicrous. There are more questions than answers, and as the only thing the card system will do is turn away the recreational gambler and ruin our businesses there is no way we should be expected to pay for this.

The only thing clear from the public submission document is that this hasn't been thought through, or been constructed by someone who understands how hotels and clubs operate. It creates more questions than it answers, and demonstrates the system is flawed.

We are opposed to the PCG System on the basis it will decimate an industry and will not deliver effective harm minimisation to Tasmania. We have been saying for several years we want to improve the existing harm minimisation measures in Tasmania and have been advocating for Facial Recognition Technology (FRT) to support and protect those that need help. The FRT system has been proven as effective in South Australia, and in some Tasmanian venues, the card system is not tested anywhere in the world. Furthermore, we have been told industry will pay for this unproven/uncosted new system -but industry will not and cannot be expected to pay for this.



Introduction

The proposed Player Card Gaming (PCG) System and Cashless Gaming Systems is impractical, will make our businesses unviable, has no thought of the impact to venue staff or the end user, and does not pass the pub test.

We understand we all have a role to play, we support sustainable harm minimisation and understand as an industry we have a social responsibility to support our local communities. This support can range from providing a safe space for locals to meet, financial support through sponsorship of local clubs, sports and community interests, through to the employment our venues create and the money we spend in local businesses.

It is evident the majority of Tasmanians who choose to gamble do so as an entertainment or leisure activity, and 99.6% of Tasmanian adults are not considered problem gamblers. Yet the Player Card system treats all Tasmanians as problem gamblers and will do nothing but drive away the recreational player.

According to the State Government's fifth Social and Economic Impact Study into Gambling (SEIS), Tasmania has one of the lowest rates of problem gambling in the nation, the lowest spend per person, and the lowest spend of household disposable income. In fact from 2011 to 2021 the number of problem gamblers dropped by 43%, demonstrating the existing Tasmanian Gambling Exclusion Scheme (TGES) is effective. Instead of supporting the TGES to be more effective through the introduction of Facial Recognition Technology (FRT), and improving the onboarding process, the Tasmanian Government are proposing to create a system that has never been tried anywhere, that industry has had minimal information on, and that will still allow problem gamblers to lose \$5,000.

In a research report for Endeavour Group Morgan Stanley have assessed the likely reduction in gaming revenue to be 70%. In addition to impacting revenue at all venues, this will diminish business valuations, a figure we have all gained finance against. From a revenue perspective gaming is only one area of our business, but on our P&L's it supports us in subsidising other areas of our business. It allows us to keep our doors open, provide affordable pricing on food and drink, appropriately staff our venues and funds support for local clubs and activities.

With indications suggesting a system will cost industry between \$20 million and \$100 million to implement, and reduction in revenues of up to 70%, this will decimate our

businesses and force many of us to close our doors. If these reports and costs are true this would impact our businesses (and in turn local communities) which would include;

- A loss of up to \$27 million per year in staff wages across Tasmania.
- Reduction in local community support of over \$8.3 million, including direct financial support and the provision of product, room hire, etc.
- Reduced opening hours and increased pricing.
- Potentially 50 family owned and regional business, would be forced to close their doors, that's over 55% of hotels and clubs with EGM's.
- Reduce business valuation leading to loan foreclosures, and in turn business closures.

The sustainability of our business, and our ability to support our local communities, relies on ensuring the potential for harm from this legal, entertainment activity is minimised. When the costs of the system are overlayed with the business and community impacts it is evident that there are better, more effective ways to minimise harm.

The bespoke system proposed by the government is flawed as it allows problem gamblers to still gamble (and lose up to \$5,000), and without costings one can only assume cripplingly expensive.

Tasmanian Gambling Exclusion Scheme (TGES) and Facial Recognition Technology (FRT)

To imply that the gaming industry in Tasmania has no interest in improving harm minimisation is nonsense. As businesses, and people of our local communities, we are committed to minimising gambling harm. We have been calling for better ways to reduce harm for several years, as the systems we have in place are very much outdated. The industry has many ideas for improvement but unfortunately our pleas over time have fallen on deaf ears.

From 2011 to 2021 the number of problem gamblers in Tasmania dropped by 43%, whilst over this time the TGES has had a consistent number of people listed (around 380). However, the TGES relies on those excluded doing the right thing, and staff to recognise them if they don't, against an often-outdated photo (and those people may have changed their appearance). This is an unrealistic burden to staff.

Making it easier to enrol in the TGES would mean problem gamblers feel less

stigmatised, and more likely to enrol. Adding FRT to the TGES would significantly increase excluded patron identification, and support staff, meaning an excluded person can't lose \$1 to gambling – the proposed government program allows that same problem gambler to lose \$5,000.

The use of FRT has been proven in South Australia, and some Tasmanian venues, already, providing help in real time for those that are at risk.

Because FRT is a live system, detection of excluded people is instant, alerts happen in real time for venue staff which means they can engage with someone before any money is put in an EGM.

At the same time staff are alerted, the person's chosen help provider will be alerted, allowing help providers (or their councillors) to contact the individual at the time support is needed.

This technology is in existence, has been proven and does not come with an exorbitant price tag a bespoke system does.

As an industry we believe that \$0 is the correct amount for someone with a problem gambling to lose. We are fully supportive of stopping those individuals who need help and getting the right help to them when they most need it. There are more effective (and proven) harm minimisation measures that address the issues of problem gambling than the blanket 'one-size fits all' mandatory pre-commitment proposed by the government.

The Pub Test

We have surveyed our customers around Tasmania, including recreational gamblers and those that don't gamble at all, to see what their thoughts on these new proposed systems are – to see if it passes the Pub Test.

The resounding result – **This just doesn't pass the Pub Test!**

Some of the responses included;

- “That sounds a bit Big Brother – next thing they'll be telling me how many beers I can have.”
- “I tried to sign up for that in Melbourne, took too long so I gave up and left.”
- “Why is the government trying to tell me how to spend my money?”

- “I don’t play them, but that sounds like they’re making it too hard for those that do. Can’t they just give more support to those with problem gambling?”
 - “Where will we go if the pub shuts?”
 - “They don’t have enough staff here most days, so who will help me sign up?”
 - “So if I win, can I gamble my money?”
 - “This pub supports our footy club, he’s already told us if this comes in he won’t be able to afford to sponsor us. Without his support our footy club would fold”.
 - “Sounds like a system designed by someone who’s never seen the real world”
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Conclusion

The proposed system will do little to minimise harm, but instead cause the unintended consequence of forcing Tasmanian hotels and clubs to close, removing wages and funds from communities, and ruining the lives of those that work in a legal and regulated environment.

The industry wants to improve harm minimisation to support and protect those that need help, this card system will not deliver that outcome as effectively as other measures. It removes patron choice and shifts the damage problem gambling does from one area of society to another. Government must balance harm minimisation measures with the overall impact to Tasmanians or recreational gamblers and their communities will suffer. If this were to occur, the overall outcome of harm minimisation would not be achieved.

There are numerous reasons why the Player Card System should be abandoned in favour of Facial Recognition technology including;

- It’s a world first but not designed to suit the real world
- It alienates the recreational gambler and will impact communities
- The existing system works, and would be improved through the addition of FRT
- The player card system sets staff (and venues) up for abuse and failure
- The costs are unclear but likely to be significant, and crippling to business
- Venue around Tasmania will close
- There are more questions than answers

The Government and the Commission should look to Facial Recognition as the solution to help improve harm minimisation, support the staff who work in the industry to better

understand how to support problem gamblers, and remove the barriers people experience in excluding themselves from gambling.

RESPONSES TO PUBLIC CONSULTATION PAPER

What is Card Based Gaming

Card based gaming is a system that requires a player to obtain a registered player card, where the player's identification is verified, for use on all EGMs across Tasmania, in hotels, clubs and casinos.

TLGC Questions

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

- What systems would be in place to ensure players don't get more than one card?
- The document references being the time period for a daily limit as a gaming trading day and not a business day. Given many venues have varying gaming trading hours how will this be effectively managed?
- Staff understanding of the system will vary by venue (and person), which will impact on player experiences. Likewise the staffing levels of venues may impact the speed of signing up, changing limits, or getting assistance.

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

- What information will be available for them to choose from?
- What other player information templates are there?
- Will the information available in the players account be downloadable as a pdf?
- Will the information be emailed?

Questions we as industry would like more information on;

- The card would hold sensitive and personal information about the player, what securities would be in place to protect this information?

- The account could be used as a pseudo bank account, what measures would be put in place to prevent this?
- My pub loses internet connection and impacts people playing EGMs, how will regional areas be supported with this card and internet access?
- What systems would be put in place to prevent data skimming?
- What happens if someone forgets their pin or password?
- Why is it a 2 phase approach? Surely this just opens an avenue for a problem gambler to spend over their daily limit.
- What would stop a player from accessing multiple cards from other players and using my venue. I've already had customer tell me this is what they will do.
- The carded player account could be used to launder money, what measures would be in place to prevent this.
- If someone comes in and plays \$100 and wins \$5,000 are they able to gamble what they won?
- How long will it take to verify someone's identity?
- How long will it take to register?
- Will my staff be able to access player accounts?
- What if someone wants help, how does a staff member help them?
- Who will pay for the installation of card readers?
- How much will it cost per EGM?
- Are all my EGM's able to be changed?
- I can't get data out of the Max System, how will I get data out of this one?
- The Max System doesn't work on an iPad, will this system work on one?

Information about player cards

Many players may already be familiar with the EGM card system that is currently used in Tasmanian casinos.

TLGC Questions

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

- What information from the player system would be provided to a loyalty program?

- Who would control the cross-sharing of data between the player card systems and the loyalty program?
- How would this information work across groups with multiple sites?
- Would the card used for casinos be able to be used in a hotel or club?

Questions we as industry would like more information on;

- What ability will there be for someone to be able to access data on a player, does this create a data risk.
- What will stop people skimming data from the card?
- Will venues need to hold onto blank cards?
- How will the card be allocated to the right person?
- What happens if two people have the same name?
- Can the data strip be accidentally wiped by electronic fields?
- How will I know how many cards I need to have at my venue?
- Do the card readers attach to my EGM?
- Who pays for the card reader?
- My EGMs were offline for months when we transitioned, will this be the same?
- Will it be a phased roll out?
- Can my EGMs be adapted to this new system?
- Who will be providing my staff with training?

The Registration Process

Players will need a player card to play EGMs. The registration process will be simple, secure and able to be done online through a web-based application (a player portal) or at any gaming venue statewide.

Questions we as industry would like more information on;

- Who funds or provides the computer at a venue that the player is meant to register on?
- What happens in the event of limited or no internet connection in regional areas?
- Staff understanding of the system will vary by venue (and person), what support will there be for staff who are abused by customers.

- How long is the expected registration process going to take? In other jurisdictions this process was taking up to 45 minutes per player.
- What happens if the systems crashes?
- Who funds the additional staff member that registering players may use.
- Is each venue going to be provided with a card coder? Is the expectation that all staff are required to be trained on this?
- Can staff without an RCG register players, or will this task be restricted to RCG qualified staff?
- Before registration, Step 3 says the TGES database is checked. How long does this take?
- If player are allowed to load funds using EFTPOS does that impact on any future cash out limits during that day?
- As there is now a limit on the amount of loss a player can make, and cash cannot be used in EGMs – why can't a venue have an ATM.
- Do cash out limits apply to the player card like an EFTPOS card?
- How long does the registration process take?
- What happens to those patrons who have issues with technology?
- Will the system be accessible for people who need support or have reading difficulties?
- How many cards am I meant to keep and how do I know which person gets which card?
- How much will the cards cost?
- Will banks charge players a transaction fee?
- It took 6 months to get EGMs online when we transitioned, will this cause the same disruption?
- What staff training and support is there? If I have a problem at the moment Max Gaming tell me to ring the THA?

What is Cashless gaming

The PCG card based system is designed to be cashless only. This means that cash cannot be loaded directly onto the EGM, rather funds for play must be credited to an account associated with a player card.

Questions we as industry would like more information on;

- Who pays the GST on funds – transferring money between ABN’s requires GST to be paid?
- Will I be liable for GST if someone loads money on to their card but decides not to play an EGM?
- Venues are already cash negative (more cash leaves a venue than comes in due to EFTPOS and Cash Withdrawal), and as the PCG system is largely cashless (with EFPTOS to Card available) how is a venue meant to have cash available to pay withdrawal if requested.
- This reads as though the Government or Liquor and Gaming will act as some form of bank, holding player funds and redistributing based on revenue and player payments. Is this the case?
- Can people withdraw money at my venue if they haven’t loaded money there?
- What reports will I receive from the government on taxes, revenue, community support levies to reconcile my daily banking?
- If the government are holding and reconciling centrally, how frequently will the government provide me funds I am due through player turnover?
- How will I know what money in the till is mine to pay bills with?
- Will we have ATM’s in our venue so people can withdraw winnings?

What does pre-commitment mean?

Pre-commitment is a harm minimisation feature to help players manage their spending behaviour by being able to set limits such as: maximum loss and maximum time of play over certain periods (such as day, month, or year).

Questions we as industry would like more information on;

- We are against the government imposing mandatory pre-commitments on people, as one size does not fit all.
- Is the governments determined spend limits (\$100, \$500 and \$5,000) how much I can;
 - deposit,
 - lose,
 - turnover
 - or is it the net difference of loss (wins less loss = loss limit)

- Why is it ok for a problem gambler to lose any money, as an industry we want to prevent harm from gambling. Allowing problem gamblers to lose money seems the opposite of minimising harm.
- If the government set a limit on EGM, won't problem gamblers just move to other forms of gambling?
- If someone comes in and plays \$100 and wins \$5,000 are they able to gamble what they won?
- Will the government next tell me how many drinks I can have at the bar?
- What happens if I lose internet, will my EGMs stop working?
- How will the system know each persons limit?
- Can my staff see who has changed their limit?

What type of limits will there be?

There will be three types of limits:

- *maximum loss;*
- *maximum time spent playing EGMs; and*
- *breaks in play.*

Mandatory loss limits must be set by the player either in venue or online via the player portal for daily, monthly and annual loss. At time of registration, players will be assigned the default loss limits until such time as they set other limits (higher or lower).

TLGC Questions

A certification process will be required for higher loss limits requests. How stringent should this certification process be?

- The certification process should be able to be completed by an individual and not be to a level that places a 3rd party as being responsible for someone else's losses.
- The process should be enough for a person to reasonably think about their actions, but it is not up to a government to tell people how they choose to spend their money.

What evidence of financial capacity should be provided to support higher loss limits requests? Mechanisms could include such things as a statutory declaration attesting to financial security, completion of a checklist containing information on responsible gambling, endorsement letters from third parties etc

- It is not up to a government to tell people how they choose to spend their money, the framework implemented should be designed to support people make rational decisions, but not be a process where a person is required to get a statutory declaration completed, or a 3rd party is required to verify a persons financial capacity to participate in gaming.

Questions we as industry would like more information on;

- How will maximum loss be calculated (\$100, \$500 and \$5,000)?
- This could be preventative to a recreational gambler, and likewise have a big impact on a problem gambler, and it could unintentionally drive them to other forms of gambling where there are no limits
- If someone lowers their limit and it doesn't take effect immediately due to a system error, and that person then loses more money will the government or the monitoring operator be responsible?
- Breaks in Play – Whilst we support gamblers taking a break in play we are concerned that when doing so it would restrict the EGM from use for other players?
- If problem gamblers are excluded from a venue (or gambling in a venue) will they still be allowed in if the card system is in place?
- How will my staff know which players aren't allowed to gamble?
- If the gaming commission are the ones who decide what a player can lose (be it the default limit, or an increased limit), and that person cannot actually afford to lose those funds will they be liable?
- Will a staff members card be deactivated while they are working?
- Is the governments determined spend limits (\$100, \$500 and \$5,000) how much I can;
 - deposit,
 - lose,
 - turnover
 - or is it the net difference of loss (wins less loss = loss limit)
- If someone comes in and plays \$100 and wins \$5,000 are they able to gamble what they won?

Mandatory breaks

In addition to loss and time limits, mandatory breaks will be introduced to limit the amount of continuous time that a person can play gaming machines.

Questions we as industry would like more information on;

- If a player suspends a gaming session and reserves the EGM for 10 minutes, and after the 10 minutes does not return to the EGM what happens to the player funds? Does the EGM automatically unlock?
- When on a mandatory break would the funds be automatically transferred to the card?
- Does the player leave their card in the EGM to reserve/lock the EGM?
- How would the player unlock the EGM after their 10 minute break?
- How will the gaming session be timed?
- Does watching keno in my gaming room count towards their timed gaming session?
- Why was 2 hours decided at the time period?
- What is meant by 'continuous' play?

Player Registration

Players will need a player card to play EGMs and, to ensure only one card is issued per player, they will need to register to receive a unique player identification.

TLGC Questions

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?

- If the system, checks and security (registration, pin number, etc) work as proposed then there should be no other points of identity verification.

Questions we as industry would like more information on;

- How will the government ensure players only have access to 1 card and not duplicate cards? The Commission has publicly stated (Mornings – ABC Hobart, 4 July 2024) that people will access more than one card.
- How will the person be identified to the card?
- What is to stop people from borrowing other peoples cards to gamble with?
- This is driving an unrealistic cost to business as I will have to pay for additional staff to assist patrons to register.
- How much of these costs are the government contributing?
- What processes will be in place and who will provide the infrastructure to venues to enable the information listed against ‘online player portal’ to be provided ‘in person at a venue’?
- Why are non-Tasmanians being treated differently?
- Who will provide me my revenue so I can pay staff and suppliers?
- What if the internet is down at my venue, how can I register people?
- What happens if they don’t have ID?
- What documents do I need to upload to the system? How do I upload them?
- Who funds the additional staff member that registering players may use?
- Is each venue going to be provided with a card coder? Is the expectation that all staff are required to be trained on this?
- Can staff without an RCG register players, or will this task be restricted to RCG qualified staff?

Player Activity Statements

Player activity statements will be easily accessible to a player either online through the player portal or via a request at a venue if the player does not wish to access online account facilities.

TLGC Questions

Should player activity statements be mandatory or optional? For example, players can opt-in or opt out of receiving statements.

- What is in the player activity statements?
- So the commitment is mandatory but this is optional?.

How often should player activity statements be generated?

- Given limits will be daily, monthly and annually the player should be given the opportunity to view their statement and spend relative to the limit periods.
- How will the information be made available in the players?

What information would you like to see on a player activity statement?

- What information will be available for them to choose from?
- What other player information templates are there?

Questions we as industry would like more information on;

- Who will provided the infrastructure (computer and printer) if a player requests a player statement at a venue.
- What securities will there be around player statements and who can access?
- Can my staff access player activity statements?
- Will the information available in the players account be downloadable as a pdf?
- Will the information be emailed?
- What support will there be for people to understand the player statements?
- Will staff need training on how to access these?

Consent to use personal information

Players will need to authorise the use of their personal information for the purposes of the player card and cashless gaming system.

Questions we as industry would like more information on;

- What happens if a player does not consent to the use of their personal data.
- Why does the commission need both de-identified and identifiable data? Wouldn't they only need identifiable data?

- Who will the Commission provide this information too? Does this mean anyone in government can see player spend?
- What protection will there be on privacy?
- How long will this data be stored?

Information Collection and Storage

The system design will ensure security of personal data.

TLGC Questions

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?

- What data and information will be collected?
- A lot of faith appears to be being placed in the monitoring operator in relations to the collection, storage and access to sensitive information. What measures will be put in place to prevent the misuse of data.
- Who is liable is personal information (including bank details) are accessed incorrectly.
- This information, in addition to being highly confidential, is considered highly valuable to certain parties – how will the government ensure this data is protected.

Questions we as industry would like more information on;

- Medicare data was hacked, along with Optus and other major companies, how will the monitoring agent and liquor and gaming ensure this sensitive data is not at risk?
- Who will the Commission provide this information too? Does this mean anyone in government can see player spend?
- What protection will there be on privacy?
- How long will this data be stored?

Limit Setting

The loss limits amounts were informed by national and international research and the 2021 Social and Economic Impact Study of Gambling in Tasmania and recommended by the Commission to Government.

Questions we as industry would like more information on;

- So the Commission feel that it is ok for a problem gambler to lose up to \$5,000?
- “The loss limits and limit setting process will be reviewed by the Commission following 12 months of full operation of the PCG system.” Based on this the Commission aren’t confident the amounts or process is correct?
- If a player is given the default limit but cannot afford that amount, given the government approved that limit is the government then responsible for any impacts?

Player Cards

At the completion of the registration process, the player will receive a player card that for security purposes has no identifying player information printed on the card.

Questions we as industry would like more information on;

- If the card has no identifying information on it, what will stop people from using multiple cards?
- If I’m talking to someone and we both drop our cards how will we be able to tell which card belongs to who?
- What happens in the event of a dispute on card ownership?
- Who is expected to cover the cost of the new card readers?
- How many attempts will a player have to get the pin wrong?
- So as long as a player knows the card’s pin they can use any card they want?
- Who pays for the card?
- Who pays if a replacement card is needed?
- How will the card reader work?

- Who fixes the card reader if it is broken?

Collecting Funds

No cash payouts will be allowed from the EGM under the PCG system. Player funds will remain in the player account until the player chooses to collect those funds.

TLGC Questions

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

- If a player can only lose a set amount of funds, then what would the purpose of loading more funds on the card be?

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

- This would serve no purpose if there is a loss limit in place.

When a player collects funds, should there be an ID check as well as entering their PIN?

- ID is not provided at an ATM or when I withdraw cash from my debit card – so why would ID be required when collecting funds?

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

- The amount of cash available at a venue (which will be reduced due to the new system allowing direct transfers to player cards) will largely dictate what funds a venue can pay for small wins.

Questions we as industry would like more information on;

- Venues are already cash negative (more cash leaves a venue than comes in due to EFTPOS and Cash Withdrawal), and as the PCG system is largely cashless (with EFTPOS to Card available) how is a venue meant to have cash available to pay withdrawal if requested.
- Can people withdraw money at my venue if they haven't loaded money there?

- If the government are holding and reconciling centrally, how frequently will the government provide me funds I am due through player turnover?

Exclusions

The Tasmanian Gambling Exclusion Scheme allows people to be excluded from gambling venues or from participating in gambling.

Questions we industry would like more information on;

- The current system is reliant on staff recognising an excluded patron (who most likely has tried to change or hide their identity), with the onus being on the venue. Given the card system will not prevent an excluded patron from gaining a card (or access to someone else's card), why isn't more effective harm minimisation technology (such as FRT) being used?
- Why isn't registering on the TGES easy, discreet, but more importantly instant?
- Why aren't we using Facial Recognition Technology to identify excluded patrons?
- Why are the images on the TGES reports so hard to see?
- How are staff meant to check a live system they are not allowed to have access to?
- Why are the photo's on the TGES so old?
- Why aren't exclusions images updated more frequently?
- Why are venues (and staff) responsible when an excluded person has purposely changed their identity?

Hardware Requirements

The player card gaming system will require new hardware in hotels and clubs

Questions we as industry would like more information on;

- Who pays for the hardware?
- How are venues meant to find the money required to upgrade with no information on time or cost?
- Can anyone install them or will it be regulated that the LMO installs?
- How long will it take to transition each venue? It took over 6 months for the monitoring operator to provide a stable network after the roll out the transition on 1 July 2023.
- What happens if an EGM is too old to convert?
- Who will remove the coin mechanisms from each EGM?
- Who maintains the hardware?
- What are the ongoing costs of the system?
- Is the card encoder able to be used by any staff member?

Implementation – phased approach

There will be a phased approach to the introduction of player card gaming in Tasmania.

Questions we as industry would like more information on;

- Why has no date for the implementation of the second phase been determined?
- Will the roll out take as long as the transition in July?
- How will venues be scheduled for transition?
- Will venues have to close while they are transitioned?
- Who pays for the change over?
- What if my EGM can't be changed
- Are there fines for delays by the installers?

General Questions

- If someone leaves their card in an EGM and another player uses their credits who is responsible?

- What happens if someone is on a time limit break and reserves their EGM, but takes longer than 10 minutes?
- The removal of an EGMs ability to accept cash, and the addition of a card reader, will come at a significant cost per EGM. As this is a program designed to reduce harm will these cost be covered by the Community Support Levy?
- As the funds will be held in a central account, is the government acting like a bank in this instance?
- Who will cover the transaction fees of the government holding and transacting funds.
- As funds will be moved from one ABN to another who is responsible for declaring and paying the associated GST.
- The current monitoring system can't show online (or remotely) the floor view or what is happening on an EGM. How can the Commission expect this new system to work more effectively through the same monitoring system?
- Monthly Limits – given months have different amount of days how will this work?
- Do I have to turn the terminal off of a night?
- Who will have access to set up new cards?
- Will each employee need a unique log in to operate the system?
- What happens if the card reader breaks down?
- Why is this not covered under the CSL if it is a harm minimisation measure?
- I've got EGMs on payment plans, but if this comes in I'll have to close. What happens with my EGMS
- Will the government give me compensation if I have to close, I've invested my life savings into his venue?
- There is no money in hospitality as it is, this will ruin me.
- What resources and support will there be?
- Why are we doing this if only 0.4% of Tasmanians have a problem gambling?
- Why can't we just improve the existing system (TGES) that's already working?
- Will there be an API key for this system? Max still don't have one for their existing system?
- Will this be accessible on iPad, I can't currently get reports form Max on my iPad?
- Who will compensate me if my business is devalued because of this?
- Who will provide training?

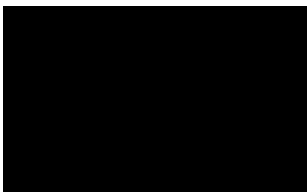
- Will training be offered in venue or do I have to pay to send staff to a session?
 - What support will there be for my business?
-
-

Conclusion

The proposed system will do little to minimise harm, but instead cause the unintended consequence of forcing Tasmanians hotels and clubs to close, removing wages and funds from communities, and ruining the lives of those that work in a legal and regulated environment.

The Government and the Commission should look to Facial Recognition as the solution to help improve harm minimisation, support the staff who work in the industry to better understand how to support problem gamblers, and remove the barriers people experience in excluding themselves from gambling.

This document is being submitted on behalf of, and has been endorsed by, the 90 listed hotels and clubs across Tasmania with Electronic Gaming Machines.



Brad Upton

THA Gaming Manager

Name	Venue
Matthew Wardrope	All Year Round Tavern Launceston
Ben Carpenter	Beach Hotel Burnie
Julie Armfield	Beauty Point Waterfront Hotel Beauty Point
Jocelyn Cody	Brighton Hotel-Motel Brighton
Vanessa Riley	Campbell Town Hotel & Motel Campbell Town
Paul Jubb	Central Hotel Hobart Hobart
Ian Vaughan	Club Hotel Glenorchy
Alan Williams	Cock 'N' Bull Pub Launceston
Jason Wagner	Dodges Ferry Café and Bar Dodge Ferry
Peter Dixon	Edgewater Hotel Devonport
Ian Billings	Exeter Hotel Exeter
Georgena Roland	Grand Hotel Huonville
Sharree Rutherford	Gray's Hotel George Town
Ros Sandors	Heemskirk Motor Hotel Zeehan
David Marshall	Kendalls Hotel Scottsdale
Ken Lock	Lords Hotel Scottsdale
Jason Atkins	Marquis Hotel - Motel West Hobart
Rochelle Steed	Mornington Inn Mornington
Greg Brown	Orford Blue Waters Orford

Pam Whitney	Park Tavern Tasmania Launceston
Peter Goss	Plough Inn Launceston Launceston
Jeremy Dodd	Queens Arms Hotel Longford Longford
Scott McCrossen	Queens Head Hotel North Hobart
Vickey Appleby	Regatta Point Tavern & Holiday Villas Strahan
Marianne Moore	Regent Hotel Burnie
Kristie Watson	The New Norfolk Hotel New Norfolk
Val Salter	The Queens Head Inn Perth
Andrew Stack	The Shoreline Hotel Howrah
Don Withers	The Top Pub Rosebery Rosebery
Terrance Kirkpatrick	Top Of The Town Hotel - Motel Burnie
Lloyd Young	TRC Hotel Launceston
Rick Anderson	Ulverstone Returned Servicemen's Club Ulverstone
Silvana Andreacchio	Wharf Hotel Wynyard Wynyard
Frank Morgan	Pembroke Hotel Sorell
Frank Morgan	Globe Hotel Hobart
Alexia Kalis	Beachfront at Bicheno Bicheno
Alexia Kalis	Beltana Hotel Lindisfarne
Alexia Kalis	Black Buffalo Hotel North Hobart
Alexia Kalis	Cooley's Hotel Moonah

Alexia Kalis	Kings Meadows Hotel Kings Meadows
Alexia Kalis	Kingston Hotel Tasmania Kingston
Harshil Shridhar	Foreshore Tavern Lauderdale
Harshil Shridhar	Olde Tudor Motor Inn Prospect
Harshil Shridhar	Bayside Hotel St Helens
Joshua Watson	Midway Point Tavern Midway Point
Michael Best	Alexander Hotel Devonport
Tony Kennedy	Burnie Central Townhouse Hotel Burnie
Tony Kennedy	Gateway Hotel Devonport
Tony Kennedy	Granada Tavern Berridale
Tony Kennedy	Hotel Carlyle Derwent Park
Tony Kennedy	Riverside Hotel Motel Riverside
Tony Kennedy	Mowbray Hotel Mowbray
Jocelyn Cody	Risdon Brook Hotel East Risdon
Richard Hall	RJ's Westbury Hotel Westbury
Leigh Reid	Shearwater Tavern Shearwater
Jamie Smithurst	Sheffield RSL and Citizens Club Sheffield
Diana Doyle	Snug Tavern Snug
Angela Forsyth	St Helens RSL Ex-Servicemens and Citizens Club St Helens
Scott McCrossen	Star and Garter New Norfolk

Alana Brown	Sunnyhill Tavern Ravenswood
John Dabner	Tall Timbers Hotel Motel Smithton
Peter Dixon	The Black Stallion Hotel Rocherlea
Justin Artis	The Bridport Hotel Bridport
Garry Laskey	The Commercial Hotel Launceston
Robert Green	The Deloraine Hotel Deloraine
Wade Oats	The Dover R.S.L. and Ex-Servicemen's Club Inc Dover
Ralph Norton	The Empire Hotel – Queenstown Queenstown
Corey Mansson	Queenstown Railway Hotel Queenstown
Karen Jacobs	Ravenswood Over 50 Club Ravenswood
Michael Best	Argosy Motor Inn East Devonport
Michael Best	Elimatta Hotel Devonport
Michael Best	Formby Hotel Devonport
Michael Best	Neptune Grand Hotel Penguin
Michael Best	River Arms Hotel Ulverstone
Michael Best	Seabrook Hotel Motel Somerset
Michael Best	Smithton Bridge Motel-Hotel Smithton
Michael Best	Somerset Hotel Somerset
Michael Best	The Lighthouse Hotel Ulverstone
Julene Jones	Brooker Inn Moonah

Julene Jones	Claremont Hotel Claremont
Julene Jones	Derwent Tavern Bridgewater
Julene Jones	Elwick Hotel Glenorchy
Julene Jones	Furner's Hotel Ulverstone
Julene Jones	Hotel Federal Wynyard
Julene Jones	Hotel Tasmania Launceston
Julene Jones	Hotel Valern Moonah
Julene Jones	Mackeys Royal Hotel Latrobe
Julene Jones	Molly Malones Devonport
Julene Jones	Newstead Hotel Newstead
Julene Jones	Waterfront Hotel Bellerive