

9 AUG 2021

**The Secretary**  
**Department of Treasury and Finance**  
 GPO Box 147  
 HOBART TAS 7001  
**Attention:** Future Gaming Market Project

Dear Sir / Madam

**Invitation by the Tasmanian State Government to Comment on Reforms for the Gaming Industry**

**References:**

- A. Tasmanian Government Consultation Papers – ‘Future of Gaming in Tasmania’, July 20221, [www.gaming.tas.gov.au](http://www.gaming.tas.gov.au)
- B. Publication of Various Journal Articles on Australia’s Casinos by The Australian Strategic Policy Institute (ASPI), [www.aspistrategist.org.au](http://www.aspistrategist.org.au)

1. I appreciate the opportunity of making comment as invited. However, there is not enough information available for me to make informed comment so I will contribute to this exercise in the form of the following questions:

- a. **Cost / benefit analysis.** Has a cost / benefit analysis been undertaken? If so, will it be made available to enable more informed discussion on the Government’s proposals contained in reference A? How do the various stakeholders benefit and to what extent?
- b. **‘High-roller’ non-resident casino licences.** Does the agency responsible for the management of the casino licences have the required knowledge, skill, experience, and capacity to manage suspected breaches of the licences? The question is related to reference B which describes Australia as having “a huge challenge ahead to deal with the scale of crimes being conducted through casinos”.
- c. **Foreign government currency export controls.** Given that most foreign governments have strict export controls, according to reference B, it is conceivable that through small asset transfers e.g., watches, wildlife, cryptocurrencies, etc, most cash for gambling in Australia could conceivably come from within Australia, raising the question as to what is the real economic benefit to Tasmania?
- d. **Risk management framework.** Who will be responsible for drafting the risk management framework under which the casinos will operate? With whom will they consult and who will be the authority for approving risk exposures that have been identified in gaming operations?

2. I trust the above questions may lead to an enhancement to governance in Tasmanian gaming operations.

  
 James Ayliffe

05 August 2021