



## GTA Submission to the Stage 2 Consultation on the Future of Gaming in Tasmania

### The Gaming Technologies Association

The Gaming Technologies Association (**GTA**) is the peak representative body for Australian gaming machine technology suppliers.

GTA's members include the manufacturers of Electronic Gaming Machines (**EGMs**) and suppliers of technology supports to both venues and government regulators.

As a part of this, GTA members supply a range of technology that support responsible game play. This can be technology that supports venue-based host responsibilities, including player intervention and recording of such interventions. It can also be through player empowerment, such as education and various forms of player directed self-limits, and self-exclusion.

### Overarching comments

GTA supports the overarching intent of the announced gaming reforms and applauds the Tasmanian Government for continuing implementation of the reforms.

GTA believes that overwhelmingly the draft Bill implements the reforms as announced. Other than as specifically addressed in our submission, GTA has not identified any significant issues which we believe should prevent the Bill proceeding.

GTA looks forward to consultations on the content of the General Standards anticipated by section 123. GTA's Technical Committee possess a unique capacity to review and advise regulators in the drafting and amending of such standards. The Technical Committee can provide a single point of contact for a whole of industry comment.

GTA believes that competition is good for customers and supports innovation. Competition between gaming machines suppliers is the source of innovation that produces new games with enhanced entertainment.

### Specific issues

#### Definition of gaming machine

GTA supports the proposed definition of "*gaming machine*".

#### Fully Automatic Gaming Machine

GTA supports the proposed definition of "*fully automatic gaming machine*".

#### Simulated Racing Games

GTA supports the proposed change to no longer define this kind of game as a casino game.



### Core, Regulated and Other LMO services

GTA believes the general structure of Core, Regulated and Other services for the LMO is consistent with structures adopted in other similar jurisdictions in Australia.

### Reduction in the Number of Permitted EGMs

GTA believes that licences validly issued as at the date of commencement should continue to be honoured. There may be some machines not in use for a range of reasons, including for example related to venue renovation.

In the event that there are validly issued EGM licences which are cancelled, there should be clear guidance well in advance to potentially impacted operators.

### Social and Economic Impact Study

GTA supports the Social and Economic Impact Study being conducted every 5 years. This reduces the cost to interested parties making submissions, and to the government, without unduly lengthening the time between SEIS reports. It gives time for any outcomes from earlier studies to be implemented, have effect, and be properly analysed.

### LMO to have exclusive rights to install, set up and maintain EGMs

Ideally, the government should exhaustively consider how competition could be a feature of the supply of these services.

Many jurisdictions permit holders of an EGM manufacturer's licence to service EGMs. EGM manufacturers are often best positioned to service EGMs given their knowledge of products in the field, ability to quickly source components & resolve technical issues and vast experience in other jurisdictions.

Alternatively, a system should be established to oversee and provide redress where operators or others believe overservicing or over-charging is occurring.

### LMO to have exclusive power to destroy EGMs

Our submission above on exclusive rights to certain services is also pertinent to this proposed exclusive service.

GTA also believes the government should establish controls to ensure that machines intended for destruction are not re-sold outside the Tasmanian market. GTA is specifically concerned that EGMs licensed for the Tasmanian market do not find their way to unregulated markets outside Australia or to illegal use inside or outside Australia.

### Proposed General Standards set out in section 123

GTA believes the proposed list of general standards are the kinds of standards we would expect to be published.