



GAMING
TECHNOLOGIES
ASSOCIATION

18 October 2024

The Tasmanian Liquor and Gambling Commission
C/O Department of Treasury and Finance
Hobart TAS 7001
Attention: Player Card Gaming Project
Sent by email: player.card.gaming@treasury.tas.gov.au

Dear Commission,

Thank you for the opportunity to make a submission in response to the Discussion Paper on Player Card and Cashless Gaming.

GTA was established in 1994 and is the peak representative body for suppliers of gaming machine technologies in Australia. GTA members include leading Australian and international providers of Electronic Gaming Machines (EGMs) and technology equipment to both hospitality venues and government regulators. Our members include Ainsworth Game Technology, Aristocrat, Aruze Gaming Australia, IGT (Australia), Interblock Asia Pacific, Konami Australia, Light & Wonder, Onyx Gaming, Ebet, Everi Technology and Tabcorp Holdings Ltd. Associate members include Paltronics Australasia, Utopia Gaming Systems and Wymac Gaming, with JCM Global as an affiliate member.

For 30 years, the GTA has been working with governments to ensure a vibrant, responsible, and sustainable gaming entertainment industry for players and customers. Our members provides the vast majority of Gaming Systems to the Gaming Industry globally.

The GTA believes that the proposal by the Commission in its current form is unworkable and is not technically feasible given many aspects of the policy have yet to have been adequately scoped or properly considered. The complexity of the proposal as outlined in its current form apart from being ill-thought out is unprecedented in the Australian Gaming Industry or anywhere globally. Integrating multiple Central Monitoring Systems and loyalty programs into a unified Player Card system presents significant technical, resource and cost challenges.

This proposal fails to detail or consider fundamental elements of such a wide-scaled policy reform on areas including system design, financial licensing, privacy, cyber-security, and other technology considerations that will need to be delivered to make this reform a reality.

Appended to this letter are our responses to the discussion paper. If you would like any further information or if there are any questions, do not hesitate to contact Jinesh Patel, Chief Executive Officer at [REDACTED] of [REDACTED].

Kind Regards,

[REDACTED]
Jinesh Patel
Chief Executive Officer
Gaming Technologies Association



Schedule of discussion questions

#	Section	Question	Feedback
What is Card Based Gaming			
1.	1.1	<i>What issues should be considered around how a player can use their carded play account and access their account information?</i>	<ol style="list-style-type: none">1. Player registration needs to be seamless and frictionless as possible. Keep ID requirements to a minimum but in line with identifiable regulations from AUSTRAC or other relevant bodies. Digital ID should also be recognized as an acceptable form of ID.2. A digital wallet should be available concurrently for convenience, given the increasing trend for contactless payments.3. Summary or statements of gaming activity on a pre-defined time period (as set by the user).4. Ability to increase and decrease limits without friction and additional documentation.5. Individual player accounts cannot be used for any type of research. De-identified collated or group data should not be used for research without express prior consent during registration.6. Ability to load, store and collect monetary value on the card. The value can travel across venues.7. Players have assurances surrounding security levels of data, and monetary values stored on cards. Protect players from nefarious actors who may target the centralised database, which is a large high value single target.
1.	1.2	<i>What information should a player receive from a carded play system and how?</i>	<ol style="list-style-type: none">1. Summary or statements of gaming activity on a pre-defined time period (as set by the user).2. Information on how to change limits, either up or down, without documentation.



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			<ol style="list-style-type: none">3. Ability to see their account balance for the Cashless Gaming portion of the solution.4. A clear 'bank style' statement for such values.
Information about player cards			
2.	2.1	<i>What issues should be considered for other programs, such as membership or loyalty schemes, that might use the same player card?</i>	<ol style="list-style-type: none">1. Loyalty and membership schemes should be allowed to continue. Consideration be given to loyalty providers of how to access data via an API or similar process. Has the regulator considered how points could be earned and redeemed at different venues on a single card in addition to ensuring fund balances move across as a user moves venues?2. A technical solution needs to be available so that users who are part of multiple loyalty schemes are able to access those schemes using their universal player card, noting that multi-venue loyalty on a single government mandated card has not been achieved in any jurisdiction.3. Sign up process for MCP and loyalty schemes share similar sign-up requirements, API across MCP and loyalty schemes to match off.4. Given magnetic stripe cards are close to end of life, any mandatory system needs to give users the ability to also use a digital wallet. The Commission may also need to give consideration to other available card based solutions.
Requests for higher Limits			
3.	3.1	<i>A certification process will be required for higher loss limits requests. How stringent should this certification process be?</i>	<ol style="list-style-type: none">1. The process to be as frictionless as possible and should be facilitated at service points such as website, app, Kiosk or venue.2. No additional requirements for financial documentation. Limit to specific acknowledgment from the player that the choice of increasing limits is applied.3. The limit changes up or down are applied at the time of the successful application. Cool down periods add additional functionality.

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	3.2	<i>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.</i>	<ol style="list-style-type: none"> 1. No supporting financial documentation to apply for increased limits. 2. A clear player's acknowledgment to apply and accept higher limits is recommended.
Identification requirements			
4	4.1	<i>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?</i>	<ol style="list-style-type: none"> 1. ID requirements can be aligned with that of the TAB, where an account can be established, and ID verification occurs at the point the player withdraws funds. This will reduce friction in the sign-up/card issuance process. 2. Card re-issue requires verification of player.
Player Activity Statements			
5	5.1	<i>Should player activity statements be mandatory or optional? For example, players can opt-in or opt out of receiving statements.</i>	<ol style="list-style-type: none"> 1. Mandatory for the Monitor to produce a statement, optional for a customer to collect or read a statement. 2. Collection points to be the website, kiosk or app if available.

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5	5.2	<i>How often should player activity statements be generated?</i>	<ol style="list-style-type: none"> 1. Statements should be generated via player demand, through the website or mobile application. 2. Monitor to produce them annually, with the statement to summarize a player's activity on a rolling monthly basis from the month since joining the scheme. Aligns with Governments time frames re annual spend.
5	5.3	<i>What information would you like to see on a player activity statement?</i>	<ol style="list-style-type: none"> 1. Net loss or win only. 2. Mandatory breaks in play are unprecedented in the Australian gaming industry. Adds complexity to the solution. Recommendation is not to implement mandatory breaks.
Information collection and storage			
6	6.1	<i>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?</i>	<p>Cyber security is an important consideration for any gaming system. The Commission needs to take care to ensure that all stakeholders in the eco-system, whether they be system providers, third party providers/vendors as well as government are provided with the necessary security infrastructure and training to ensure the safety of the system and the data held.</p> <p>Standards relating to cyber security, privacy and training will need to be developed to support the rollout of the system. Given that the proposed centralised player system will hold a multitude of data such as personal information, transaction records, requests to change limits and/or self-exclude, great care needs to be taken to develop stringent standards and guidelines to all stakeholders as to what data needs to be stored and for how long. Access to this system may need to be given to other entities such as the regulator and Federal and State law enforcement bodies, which creates added complexity and risk.</p> <p>The initial reforms announced in 2022 proposed to use Facial Recognition Technology (FRT) to underpin self-exclusion and to reduce harm. The removal of FRT by the Commission defies logic given its use in other settings such as retail and create unnecessary complexity in system design. FRT is operating with success in other jurisdictions including South Australia and New Zealand. Further, the NSW Government as part of a pre-election commitment committed to the rollout of FRT in licensed venues.</p>



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			<p>GTA recommends that the Commission engage law enforcement, regulators, cyber security experts to provide further guidance and advice. At the very least, there will be a need for the Commission to develop the following:</p> <ul style="list-style-type: none">• Cybersecurity and privacy guidance.• Minimum standards for data security.• Data breach action plan templates for venues and providers.• Cybersecurity and data security training modules for all stakeholders who interact with the system.• Governance structures to regularly engage with system providers, vendors and venues• Providing secure wireless internet access for access to the player registration portal to ensure users are not using public connections that are susceptible breaches.• Provide financial support to venues to enhance their internet connectivity and cybersecurity. <p>Further requirements outside of this will likely be needed therefore GTA recommends that a cyber security expert be engaged with an independent technical adviser who can advise on system design and architecture.</p>
Limit Setting			
7	7.1	<i>From a harm minimisation perspective, how long should a delay be before an increase in a loss limit comes into effect? That is, how long should a cooling off period last?</i>	1. Immediate if a player has not played for the day or no more than 24 hours once a player has accepted and applied for such change. This aligns with the same time frame for limit reductions.
Collecting Funds			



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8	8.1	<i>Should there be a limit on how much money can be loaded into a player account?</i>	1. No new regulated limit except to align with existing EFTPOS and ATM regulations. The regulator does not require to impose further regulation that may add to the complexity of the system solution.
8	8.2	<i>Should there be a limit on the maximum amount that can be transferred to an EGM from a player account?</i>	1. No new regulated limit except to align with existing EGM cash input limit. The regulator does not require to impose further regulation that may add to the complexity of the system solution.
8	8.3	<i>When a player collects funds, should there be an ID check as well as entering their PIN?</i>	1. No, it adds to system complexity and design scope.
8	8.4	<i>Should there be a maximum amount permitted for cash payouts for small wins?</i>	1. No new regulated limit except to align with existing EGM payout regulations. The regulator does not require to impose further regulation that may add to the complexity of the system solution.
Other Considerations			
System			<ol style="list-style-type: none">1. As this will be a 3rd party system sitting over the top of the Network and Casino CMS systems , how will integrate into the current networks?2. How does this system comply with banking regulations and what are the cost implications for users and venues?3. Real time system synchronisation will be an issue with a system so complex causing timing issues with reporting, pin identification, cash transfers, loyalty systems etc.4. QCOM 1.6 Protocol only allows a single host ,the EGMs can only talk to a single system.



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			5. Will it have its own card therefore requiring another card reader on the EGM?
	Hardware		1. All Venues will need to purchase Coin In blanking plates for their existing EGMs, depending on the age of the EGM they might not exist. 2. 6.1 inch displays and card readers are required.