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Tasmanian Liquor and Gambling Commission

Sent by email: consultation.lagb@treasury.tas.gov.au

Gaming Technologies Association Submission to Tasmanian Liquor and Gambling Commission consultation on Harm Minimisation Technologies

The Gaming Technologies Association (GTA)

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 and Tabcorp Holdings Ltd. Associate members include Paltronics Australasia, Utopia Gaming Systems and Wymac Gaming, with JCM Global as an affiliate member.

Executive Summary

GTA acknowledges and supports the intent of the government's objectives as outlined in the Ministerial Direction issued by the Minister for Finance dated 21 December 2021 (gazetted 26 January 2022). Facial recognition and player card gaming technologies, are useful tools for customers to manage their gaming spend, should they choose to do so.

Cashless-gaming trials in New South Wales venues are due to commence shortly. The findings will subsequently be peer reviewed to inform further regulatory action by the NSW Government. GTA recommends that the Tasmanian Government adopt a similar evidence based approach prior to the rollout of any state-wide scheme.

GTA welcomes the opportunity participate and provide assistance in subsequent stages of this process. Responses to the survey are appended on the following page.

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Survey Responses

Question	Response
<p>1. What do you see as the benefits, costs and/or issues in implementing facial recognition technology in Tasmanian casinos, hotels and clubs?</p> <ul style="list-style-type: none"> a. For players? b. For venues? <p>2. What do you see as the benefits, costs and/or issues in implementing player card technology in Tasmanian casinos, hotels and clubs?</p> <ul style="list-style-type: none"> a. For players? b. For venues? 	<p>For customers key issues are privacy and trust. Ensuring that there is appropriate safeguards around their data and assurances the technology is not for used outside of harm minimisation reasons will be key in the success of any rollout of any state-wide system(s). Technology issues such as privacy breaches for example have the ability to undermine the scheme entirely should there not be appropriate privacy or security parameters around storage.</p> <p>Cost to both venues and the government will be in the order of millions of dollars and will be contingent on technical specifications set by the government. It is to be expected that casual gamers, interstate and international visitors may not choose to gamble should they be forced to join a mandatory scheme to maintain privacy and avoid stigma. Compliance and an understanding of venue operations is something government will need to examine closely with industry in understanding the practicalities.</p> <p>With the customer-led trend around cashless transactions, there are benefits around anti-money laundering. The use of cash as a payment method is becoming less and less used by Australian consumers. Digital payment methods are considered to be more secure and convenient for players and provide benefits around anti-money laundering.</p>
<p>3. What pre-commitment feature or combined features would be the most effective in reducing gambling harm?</p> <p>4. To what extent will the proposed features and processes assist players to minimise the risk of experiencing harm from gambling?</p>	<p>Cashless-gaming trials in New South Wales venues are due to commence shortly. The findings will subsequently be peer reviewed to inform further regulatory action by the NSW Government. <u>The GTA advocates for a similar evidence based trial to commence in Tasmania prior to the rollout of any state-wide system.</u></p>



<p>5. Are there any other considerations the Commission should be aware of in implementing either technology?</p>	<p><u>GTA recommends that the Tasmanian Liquor and Gambling Commission establish a Regulatory Sandbox consisting of technology providers, venue operators and other government stakeholders to assess and determine the merits of available technologies on the market and the impact on operators and players.</u> This system is currently underway in New South Wales and has been a precursor to the trials that are due to commence this year.</p>
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