

# THE SHORELINE HOTEL

## **Future of Gaming in Tasmania - Public Consultation Paper 2020**

### **Submitted to:**

The Secretary  
Department of Treasury and Finance  
GPO Box 174  
Hobart Tas 7001

### **Attention: Future Gaming Market Project**

[Future.gaming@treasury.tas.gov.au](mailto:Future.gaming@treasury.tas.gov.au)

17<sup>th</sup> March 2020

Joswall (Australia) P/L is pleased to respond to the Future of Gaming in Tasmania consultation paper.

If you wish to discuss this submission, please contact:

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### **Joswall (Australia) P/L**

Joswall (Aust) P/L is a wholly Tasmanian owned family company which operates the Shoreline Hotel situated at 10 Shoreline Drive in Howrah Tasmania and have done so for the past twenty years under the same management.

In this time the venue has undergone two major refurbishments with total capital investments exceeding \$8m. The Shoreline is a large suburban Hotel with a diverse hospitality offering which includes accommodation, casual and formal dining, sports bar, bottle shop, gaming, keno and wagering. The Hotel has won many State and National hospitality awards including most recently Best Regional Hotel Nationally. It currently employs in excess of 80 people.

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## **Future of Gaming in Tasmania**

Joswall (Australia) P/L supports the proposed regulatory changes to the Tasmanian gaming environment, notably the Individual licencing of venues to operate EGM's and the proposed distribution of returns. Whilst we support the majority of the proposed changes, we would like to submit the following;

### **Use of new technologies**

Joswall believe that the government should allow the use of technologies currently available in other Australian gaming jurisdictions that would reduce the reliance on dollar coins, whether it be through the introduction of note acceptors, card-based play or ticket in ticket out technology. Any/all of these solutions would remove the daily need to handle large sums of heavy dollar coins, a task that is only possible to be undertaken manually.

The Shoreline Hotel has had a number of Workers Compensation claims in recent years for bursitis injuries that have all sited the lifting of coins as the probable cause. Each of these injuries have been responsible for loss of time worked from between two and eight weeks. The most recent case being a Duty Manager that has only returned to work in full capacity in recent weeks.

### **New Licence term**

Our preference would be that, like a number of other states, that licenses be issued in-perpetuity as opposed to the proposed twenty-year term. This would allow operators a greater degree of certainty and investment confidence.

If licences are not granted in-perpetuity, we would at least like to see measures in place to ensure that seeking and granting of a future term can be done well in advance of the expiration of the current term to ensure business continuity and not recreate the uncertainty that currently exists in our industry.

### **Mandatory Code Changes**

The Tasmanian Gaming environment is currently well regulated and controlled, however we believe that the Current Mandatory Code of Practise regulations should be reviewed as soon as possible to allow for effective and productive operations in this State.

The current 30 line maximum should be removed, allowing 50 lines of play as in all other Australian jurisdictions. Without this restriction being removed operators will be exposed to an environment where it is difficult to purchase games directly from game manufacturers post July 2023.

We believe that the restriction on ATM's being used in licensed venues should be lifted. With the appropriate use of available technologies that can limit daily withdrawals that this is a more appropriate way to restrict access to cash than the current EFTPOS withdrawal limits which rely on staff recognition of customers to police attempted repeat withdrawals.

ATM's are constantly being sort out by our interstate visitors and although there are several ATM's available within a reasonable walking distance from our property, this not necessarily the case with most venues, especially those in regional areas.

The use of ATM's would also add to the security of venues by reducing the amount of at times unsecure cash.

### **Community Support Levy (CSL)**

We support the increase in funding to the CSL, however we believe that this funding should be used more appropriately to assist those for which it is intended. Some of this funding should be used to improve the current self-exclusion scheme.

This could begin with service providers being supplied with and trained in using an appropriate camera to ensure that exclusion photos are fit for purpose.

Venues could be issued with an iPad or similar device that is secure, portable and able to enlarge images, giving staff a greater ability to recognise an excluded person.

Service providers should be appropriately funded to offer follow up services to self-excluded persons including financial counselling.

We believe that more than enough funds would be available for the above if funding was directed appropriately.

### **Keno**

As it is likely that the operation of Keno, albeit with the existing operator or new will be a monopoly operation, we believe that there needs to be adequate regulation to ensure venues receive the appropriate level of commission and pay an appropriate level of costs. Legislation should also be written to ensure it allows for consideration of technologies that exist in other jurisdictions such as self-serve terminals and the like.