



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

18<sup>th</sup> March 2020

**Submitted to:**

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The Secretary  
Department of Treasury and Finance  
GPO Box 174  
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Attention: Future Gaming Market Project

The Tasmanian Hospitality Association (THA) is the industry peak body for Hotels, pubs, accommodation venues, restaurants, cafes, caterers, sporting, community and RSL clubs in Tasmania.

We represent the interests of those pubs and clubs in Tasmania that have EGM's.

### **Key Changes in the future model**

#### **Exclusivity**

The THA is supportive of the exclusivity arrangements to end on the 30<sup>th</sup> June 2023.

#### **Community Support Levy**

The THA is supportive of the proposed changes to increase the CSL in Tasmania.

The THA firmly believes Neighbourhood Houses that are currently funded from the CSL need to come out and be funded from the appropriate budget area (Not the CSL). This would put well over \$1 million back into the CSL each year.

The THA also seeks a greater awareness program designed to provide the public and community organisations with an understanding of the origin of CSL funds. In years past, in any grants program that expended CSL funds, the letters had to state the origins of the funds. This needs to be reinstated under the new system.

The THA believes increasing the CSL is a great way to do more in the community sport and recreation space and do more to get people active and improve facilities for sporting clubs in the state.

The THA seeks to see Clubs Tasmania, as the peak body for community and sporting clubs in Tasmania, to be more involved in the CSL process for sport and recreation clubs.

We would like to work with the government to see the CSL better spent to help minimise harm from problem gambling. We believe that funding could be provided to look at a better way of producing photos for venues of excluded persons. We also believe that organisations that are funded to help problem gamblers need to do more and work closer with venues to assist those that need help.

### **Casino**

The THA is supportive of a three per cent CSL on EGM gaming being introduced.

We support seeing Trackside no longer be considered a casino game.

### **High Roller Casino**

It is difficult for the THA or anyone to fully analyse the licence for MONA given the 2015 proposal by MONA has never been publicly released.

The THA believes the two high roller casinos should pay the same licence fee as other casinos in Tasmania.

Given the basis for high roller casinos is for 'high roller, non-residents', we believe that a CSL should apply to both licences to further add to the CSL and the funds available to help problem gamblers and assist with our sport and recreation clubs.

### **Keno**

The THA believes that commission, fees and charges should be agreed between THA and the keno operator, seeing as the THA is the peak industry body, this will ensure venues receive adequate revenue going forward.

### **Hotels and Clubs**

The THA believes the term for licences should be 'Perpetuity' to allow certainty in investment and employment growth.

Given many banks are closing down ATM's around the state at a rapid rate and tourists are using many pubs and accommodation venues as 'the bank', the government needs to consider allowing ATM's in pubs and clubs like casinos. In many regional areas in the state, the pub is the only place that people can access cash through EFTPOS. If ATM's were put in, banks could then restrict how much an individual can access off their card each day and it would fix the issue of individuals trying to complete multiple withdrawals in the one day.

Feedback from tourists in venues continually suggest that they want ATM's in places where they stay, eat and drink. Perhaps a trial could be implemented in regional areas to trial the value to the community and tourists of such a measure.

Government needs to make sure that small and regional venues are able to grow and prosper under the new system moving forward.

Given the need to legislate and review the gaming act, we suggest that the Mandatory Code is reviewed and amended to make the necessary changes to allow venues to operate efficiently and productively under the new system.

Under the new gaming act, it will be imperative that Tasmania moves from 30 to 50 lines on machines so Tasmania can purchase and get machines. This has to happen so Tasmanian venues are not left exposed and unable to operate post 30<sup>th</sup> June 2023.

We must also move away from coins in machines due to major OH&S issues. Note acceptors are one way to go and government should explore the necessary options for Tasmania to operate this way. Ticket in Ticket out (TITO) is another solution that needs to be explored also.

The government must also explore a better on-line system for exclusions. Excluded people and their information should be on-line and available easily to staff in gaming areas.

Legislation must allow for any future technology changes or improvements to be available and usable in Tasmania. The industry must be able to keep up to date continually with changes in this area. The new system must also bring a competitive gaming regulatory environment that would allow pubs and clubs to offer gaming products that match those available in other jurisdictions.

The new system must allow for small operators to be able to maintain machines if they wish which means up-front costs need to be considered so they are not pushed unfairly out of the market.

### **Licensed Monitoring Operator (LMO)**

It is important that the LMO system does not allow for price gouging. Gouging by the LMO will make it impossible for many venues to operate and make the system unworkable. History in other state suggests that if you don't get this right, it will have major ramifications for venues and government. Defining core monitoring and regulatory fee services in the Regulations is essential.

### **Miscellaneous**

Trackside (simulated racing) should be permitted in pubs and clubs as soon as possible as another activity and offering to consumers by venues. Venues should not have to wait till 2023 to see this implemented. This should be done at the earliest convenience.

## **Transitional Arrangements**

There are many issues that need to be addressed as we move into the new system. The government must work with the THA to address issues as they arise. Going from an exclusive arrangement to the new owner/operator model will bring challenges. The government needs to make sure that venues are not unfairly treated as they move into the new system.

Regards

Steve Old  
**Chief Executive Officer (CEO)**