

18 March 2020

The Secretary  
Department of Treasury and Finance  
GPO Box 147  
HOBART TAS 7001

Attention: Future Gaming Market Project

Via email: [future.gaming@treasury.tas.gov.au](mailto:future.gaming@treasury.tas.gov.au)

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

Dear Secretary,

On behalf of key Tasmanian brands including Tattersall's Sweeps Pty Ltd and UBET TAS Pty Ltd, Tabcorp Holdings Limited (**Tabcorp**) appreciates the opportunity to respond to the Future of Gaming in Tasmania public consultation paper.

Tabcorp is a world-class diversified gambling entertainment group employing more than 5,000 people. We manage iconic brands that ignite passion and excitement in millions of Australians.

Tabcorp's vision is to be the trusted gambling entertainment company. We are committed to minimising gambling harm and have a strong track record for facilitating responsible gambling in Australia.

Each year, our operations return more than \$2 billion to the Australian community through state taxation, \$1 billion to the racing industry and more than \$760 million in commissions to venue partners including newsagents, hotels and clubs.

In Tasmania last financial year, Tabcorp returned more than \$42 million in state taxes, collected over \$8 million in GST and paid more than \$13 million in commissions to small business – such as pubs and clubs – many of which are owned and operated as small businesses.

Tabcorp is committed to preventing gambling harm. The sustainability of our business and our role in the community is dependent on a deep commitment to preventing harm from gambling.

Our goal is to build a sustainable future for gambling entertainment while making a positive impact.

### **Summary of Tabcorp's position**

Tabcorp supports the decision made by the Tasmanian government to clearly announce its policy for the future of the Tasmanian gaming market.

Tabcorp recognises the privilege and responsibility of being trusted to operate wagering, lottery, keno and monitoring licences across most of Australia. These products offer legal and regulated gambling entertainment to be enjoyed by millions of people and return a substantial contribution to the community.

## Casinos

Tabcorp supports the clarification removing the restriction of Trackside (simulated racing) being considered a casino-only game.

To ensure consistency with other Australian jurisdictions and state gaming regulators, Tabcorp submits the government should standardise language to “Virtual / Simulated Wagering” rather than Trackside or SDS racing game.

Further, given the additional and critical revenue benefits that will flow to hotels and clubs, Tabcorp would welcome an opportunity to be able to offer Virtual / Simulated Wagering on racing and sport prior to 2023.

Virtual wagering increases certainty and revenue for hotels, clubs and the racing industry during weather events and extraordinary events such as 2007 equine influenza outbreak. The current restrictions on sport due to COVID-19 are an extraordinary factor for early consideration.

## Hotels and Clubs

Tabcorp notes that the right to operate the Network Monitoring Licence for Electronic Gaming Machines (EGMs) in hotels and clubs will be put to a public tender overseen by Treasury.

Tabcorp currently operates as the Licensed Monitoring Operator across three jurisdictions in Australia. These monitoring services are provided across 129,300 EGMs, with robust and resilient technologies, that operate with the highest integrity to ensure compliance with regulations.

Tabcorp provides EGM service and support to approximately 85% of EGMs nationally. National presence brings to Tabcorp the benefit, knowledge and expertise to meet service levels for almost 650,000 callouts annually. Moreover, Tabcorp offers a portfolio of complementary gaming services, venue systems and venue solutions. These include customer relationship management, cashless, financing EGMs and gaming equipment and training.

We note opportunities to introduce EGMs – which are consistent with the other states – to enable the Tasmanian gaming market to potentially benefit from sourcing and possible pricing advantages.

In addition, Tabcorp has systems to allow the introduction of note acceptors based on regulated limits and other responsible gambling capabilities such as pre-commitment.

The latest systems and services are increasingly provided through digitisation and cloud-based services. Given the pace of digital transformation is forecast to increase over the next 10 years, Tabcorp strongly supports the intention to modernise and streamline the legislation to facilitate both existing digital technologies and future digital innovation and engagement

with customers. A principles-based approach that is less prescriptive and technology agnostic allows for the adoption of improved new technology without need to amend legislation.

## Harm Minimisation

For most people, gambling is a leisure activity and an enjoyable form of entertainment.

Tabcorp appreciates, however, that a portion of the population struggles to gamble responsibly.

We are committed to minimising gambling harm and want to continue our strong track record of customer care in Australia. The sustainability of our business and our role in the community relies on a deep commitment to minimising harm from gambling.

Whilst most Australians gamble responsibly and within their means, we recognise that a small proportion of the population experience problem gambling (0.6%)<sup>i</sup>. In response, Tabcorp continues to update our systems, procedures, processes and operating model to support responsible gambling, including the development of our “Customer Care” technologies and human-led tools that work hand-in-hand to better understand gambling behaviour and empower customer choice.

In 2019, TAB launched a new responsible gambling microsite to create a user-friendly and easily accessible information and assistance hub for TAB wagering customers. In line with NCPF provisions, TAB wagering also developed 14 day identity verification, automated account closure and deposit limit functionality for customers. Our lotteries business launched a responsible gambling model in 2019 with early intervention processes for customers who score on the model and on the specified business rules. Our Keno business also launched a new responsible gambling microsite in 2019 and is in the process of developing a similar responsible gambling model to Tabcorp Lotteries.

## Conclusion

Should you have any further queries, please do not hesitate to contact [REDACTED]  
Manager – Government and Industry Affairs on either [REDACTED]  
[REDACTED]

Yours sincerely,



**Tom Callachor**

General Manager – Government & Industry Affairs

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<sup>i</sup> Fourth Social and Economic Impact Study of Gambling in Tasmania (2017) Volume 2: Prevalence Survey Report to Tasmanian Government Department of Treasury and Finance by ACIL Allen Consulting