



18 March 2020

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

By email: future.gaming@treasury.tas.gov.au

Dear Secretary,

RE: RESPONSE TO FUTURE OF GAMING IN TASMANIA – PUBLIC CONSULTATION PAPER

Thank you for the opportunity to make a submission in relation to the Future of Gaming in Tasmania – Public Consultation Paper.

BACKGROUND

Aristocrat Technologies Australia Pty Limited is an Australian registered company that designs, develops, manufactures and distributes electronic gaming machines, systems, and ancillary equipment. The Aristocrat Group of Companies are licensed in around 300 gaming jurisdictions, operating in over 90 countries and currently offer a unique blend of products and services.

HARM MINIMISATION

Aristocrat strongly supports having rigorous rules in place that strive to ensure every aspect of the design and operation of gambling games is appropriate, transparent and fair, and to give players, customers and the community confidence that this is so.

Upholding the rules and promoting responsible gameplay more generally is one of Aristocrat's most fundamental obligations. We believe it's also key to ensuring we can continue to grow our business and promote a sustainable games industry that's welcome in the community.

As an industry leader Aristocrat will look to continue their support of Harm Minimisation and Responsible Game Play through a number of initiatives, including responsible game and product design, upholding applicable rules and regulations that apply to our games, supporting research and encouraging and adopting best practice standards in consultation with TLGC.

THIRD PARTY SERVICE PROVIDERS

Aristocrat would like to pursue an opportunity to offer a (unapproved), Flexible Rental Model. This model would provide Venues with the opportunity to update their aging technology and manage capital effectively.

Specifically, the proposed model would allow but not be limited to:

- renting of EGMs, peripherals and associated games
- payment of a daily fee, not linked to EGM revenue in any way, for services including content support, software upgrades and hardware maintenance

As these types of arrangements would fall under the proposed Third Party Service Provider function and as Aristocrat is already listed on the Roll of Recognized Manufacturers, Suppliers and Testers, is it fair to suggest that Aristocrat would automatically meet the requirements of a Third Party Service provider under the future model and no further licensing would be required?

LICENSED MONITORING OPERATOR (LMO)

Aristocrat would like to seek further clarification on the listed core monitoring functions of the LMO. As outlined above, under a proposed new selling model, Aristocrat would like to pursue the opportunity to be able to undertake the following proposed 'regulated' functions of:

- EGM installation, set-up and technical venue preparation;
- EGM jackpot monitoring; and
- EGM repair and maintenance for venues.

The current proposal does not address the likelihood of an opportunity for a Manufacturer and Third-Party Service Provider who is listed on the Roll of Recognized Manufacturers, Suppliers and Testers to become a Licensed Third-Party Service Contractor. As per the Queensland model a Third-Party Service Contractor would partner with the LMO and provide installation, repair and maintenance services to venues.

As part of our submission Aristocrat would like to request that the Tasmanian Liquor and Gaming Commission consider such a partnership to ensure the creation of a fair and sustainable Gaming Industry for Tasmania in the future.

We welcome further consultation and input as this process continues and would be more than happy to provide more information on any issue.

Yours sincerely,



BRONWYN BRUZZANO
Compliance Manager – ANZ and Asia Pacific