

**SOCIAL AND ECONOMIC IMPACT
STUDY INTO GAMBLING IN TASMANIA**

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POLICY RESPONSES

REPORT TO TREASURER

Tasmanian Gaming Commission

October 2008

DIRECTION BY THE TREASURER

In late July, the Tasmanian Gaming Commission (TGC) received correspondence from you relating to the 2008 Social and Economic Impact Study (SEIS) in which you asked the TGC to:

“...review the findings of the (SEIS) report and provide the Government with advice on an appropriate policy response to best address the issue of problem gambling, those at risk of developing a gambling problem, and consumer protection in Tasmania.”

This document represents the response of the TGC to that request.

INTRODUCTION

This document describes a range of policy responses that the TGC believes have the potential to improve consumer protection and reduce problem gambling in Tasmania.

Given the nature and timing of the request from the Treasurer for a review of the findings of the SEIS and advice on appropriate policy responses, the TGC has chosen not to consult with any stakeholders prior to formulating its advice. The Commission has an annual program of meetings with all key stakeholders, and engages with many of them on key harm minimisation issues regularly. As a result, the Commission feels comfortable that it understands and has heard the views of stakeholders in recent months on the issues raised in the SEIS.

However, additional specific consultation will be required to fully understand the financial and other impacts of particular policy initiatives the Government may choose to implement. It would not have been an effective use of resources to undertake such consultation until there was clarity over which policy responses Government may consider appropriate.

Sources Used in Preparation of this Document

The TGC wishes to acknowledge the assistance of staff of the Liquor and Gaming Branch of the Department of Treasury and Finance in drawing together much of the information the TGC required for this response. At the direction of the TGC they undertook a thorough review of the SEIS and all submissions made to the authors of the SEIS. They also sought out a range of other material that advised the considerations of the Commissioners.

While acknowledging support of the LAGB it is important to note that the final response is that of the TGC alone. In addition to the material compiled by LAGB staff the Commissioners have drawn upon their own knowledge and experience to formulate this response. The Commissioners come from very different backgrounds but all have an active interest in social policy and, in addition, have used their appointments to the TGC to become informed of a wide range of matters relating to

the gaming industry. Not least amongst these matters has been consumer protection and harm minimisation in the delivery and regulation of the gaming industry in Tasmania, nationally and internationally.

IS THERE A NEED FOR FURTHER POLICY RESPONSES?

There are two fundamental questions that the SEIS report addresses:

1. Compared to other Australian jurisdictions does Tasmania's position in relation to problem gambling and harm minimisation warrant urgent action?
2. Should something more be done about the level of harm caused by gambling in Tasmania (that is, does gambling affect some individuals and families particularly severely)?

The Views of the Stakeholders

The providers of gaming services here in Tasmania argue that there is no need for significant additional interventions by Government or, *if further interventions are to occur*, they should be in the areas of individual and group counselling and treatment of identified problem gamblers. In supporting their position they argue:

- problem and at risk gamblers make up only a small part of the population (<3%) and this proportion has been stable or decreasing over time;
- gaming losses per capita in Tasmania are only about half of the national average;
- the growth in gaming – particularly through Electronic Gaming Machines (EGMs) or ‘pokies’ – is capped and EGM use has begun to plateau in recent years;
- Tasmania, through regulation and voluntary codes, already has an appropriate system of harm minimisation and consumer protection. If more investment is to occur it should focus on counselling and treatment;
- further interventions focussing on access and gaming processes will diminish the legitimate enjoyment of recreational gamblers;
- no further interventions should be implemented until they are proven to be effective;
- gaming has driven major improvements in tourism and hospitality infrastructure and employment and additional interventions may well jeopardise further improvements;
- hotels and clubs are a major part of our social infrastructure, particularly in rural and regional Tasmania, and many of these depend for their existence on continuing gaming revenue; and
- the industry is only now recovering from recent bans on smoking in venues.

Non government organisations, individuals and some local governments concerned about the impact of gaming on individuals, families and communities argue there are compelling reasons for Government to be far more interventionist. Some argue for the abolition of EGMs as the most widespread and potentially dangerous gaming method. In summary they argue:

- gaming, particularly EGM gaming, is inherently dangerous and greater controls are needed if this form of gaming is to continue;
- problem and at risk gamblers are under-enumerated and the impacts on their families and communities also underestimated;
- problem and at risk gamblers may be only a relatively small part of the population but they contribute disproportionately to gaming turnover and expenditure;
- Governments have become dependent on gaming revenue and are therefore loathe to take proper action to protect those suffering negative impacts of gaming;
- there is no 'whole of government' approach to gaming issues in Tasmania and no focus on gaming as an important social policy issue;
- EGMs are the most insidious form of gaming with the machines and venues carefully and professionally designed to maximise attraction and gaming turnover; and
- proper debate on gaming and its impacts is stifled due to the financial interest of Governments and the industry, and the TGC does not have the independence or resources to properly advise Government.

THE TGC's POSITION

The TGC has reviewed the SEIS, carefully noted the opinions of a wide range of stakeholders and also taken note of the academic and professional literature available to it both nationally and internationally.

In relation to the two questions addressed above by the SEIS report, the TGC believes that:

- Tasmania does not compare unfavourably with other Australian jurisdictions either in problem gaming prevalence or in the nature of Government responses to those problems to date; but
- There are significant problems that remain unaddressed and policy responses are available with the potential to ameliorate those problems.

The TGC acknowledges the need for further research to refine responses and to evaluate overall effectiveness, but believes that the existing research base is adequate to justify the TGC's broad position stated below.

The TGC considers that:

1. *The current estimates of the numbers of problem and at risk gamblers are likely to be significantly less than the actual numbers.*

Almost universally these estimates are derived from telephone surveys and this survey methodology has a number of inherent weaknesses. Firstly, it depends on voluntary participation. There is evidence that when these surveys are about 'socially disadvantageous behaviours' (for example, drinking, smoking, gambling) those who are most likely to be harmed by their

involvement opt not to participate or are not easily contactable by random ringing of telephone landlines. Secondly, it is highly likely, and there is empirical evidence to support this, that many of those who do participate will deliberately understate the degree to which they engage in 'socially disadvantageous behaviour'. Controlled comparative studies have shown significant differences in responses to the same questions on these behaviours between telephone and online surveys. In all cases, the online responses admitted to higher engagement in such behaviours.

2. *Of the current popular modes of gaming EGMs represent the greatest risk to vulnerable gamblers.*

'Continuous' forms of gaming such as EGMs and keno represent the greatest risk. This is not to say other modes of gaming are entirely safe nor that, in the future, online modes might not also present significant risk. However, currently and in the immediate future, EGMs cause and have the greatest potential for harm. The machine producers are known to invest heavily in R&D to make their machines more profitable for venue operators. Features are developed and refined to attract gamblers to the machines and keep them engaged with the machines. Vulnerable gamblers are captured by these specifically designed features.

3. *There are more problem gamblers using EGMs than other gaming modes.*

The <3% figure of problem gamblers includes all modes of gaming including racing, lotteries, keno, minor gaming etc. There is evidence that the proportion of problem gamblers using EGMs is significantly higher (8%>) and that their losses and frequency of gambling is also higher than for other modes. EGMs are both inherently more attractive to certain groups in the community than other forms of gaming and more likely to lead to excessive gaming than other forms of gambling.

4. *Problem and at risk EGM users contribute disproportionately to turnover and losses.*

Research and 'inadvertent' commentary by industry sources indicates that while problem and at risk gamblers may be less than 10% of EGM users they contribute in excess of 40% of turnover and losses resulting from EGM use. Some argue that their contribution is much higher than this. Given the relatively low socio economic status of many problem and at risk gamblers, it would be naive to assert that such losses could largely be perceived as reasonable expenditure of their discretionary income.

The necessary corollary of the above is that any effective further interventions to reduce the incidence of EGM problem gambling will, inevitably, reduce turnover from EGMs and therefore reduce the taxation return to Government and the profitability of gaming services providers. In fact, such revenue reductions must be seen as perhaps the primary indicator that any further interventions have worked.

5. Further considered interventions could be put in place without unreasonably diminishing the enjoyment of recreational gamblers.

The 'right' of recreational gamblers to enjoy a legal and regulated gaming experience has been put forward as a reason why further interventions should not be put in place to target the 'small' number of persons who have a problem with controlling their gaming addiction.

The TGC considers that significant changes could be made to the design and operation of EGMs that would reduce their negative impact on problem gamblers, and the rate at which they lose, without material detriment to the recreational gambler. Effective interventions suggested include slowing spin rates, reducing lines and maximum bets, turning off sound effects, banning/regulating 'small wins' that mask continued losses, machine shutdowns after significant wins or extended play periods and removal of note acceptors. The evidence base would suggest that these changes are more effective when applied as a cluster of interventions rather than singly.

The other obvious policy option is to reduce access to the EGMs themselves, either by reducing the quantum of machines, by reducing the hours of access to the machines or a combination of both. Again it is likely that significant marginal changes could be implemented without onerous impact upon the recreational gambler.

6. Different 'harm minimisation' rules apply to EGMs at casinos than at pubs and clubs.

For a variety of reasons this differential has emerged. For example casinos are allowed to have ATMs and their EGMs can have note acceptors. The absence of both of these in pubs and clubs is regarded as beneficial to problem and at risk gamblers. As approximately one third of all EGMs are in the two casinos, the TGC sees these different rules as anomalous when harm minimisation and consumer protection matters are considered. Given the large numbers of EGMs in casinos and their higher rate of turnover, any further policy responses targeting problem gambling or consumer protection should be applied consistently to all venues.

7. There are some groups within our society at greater risk of harm from problem gaming.

EGMs in pubs and clubs are overly concentrated in areas of relative social and economic disadvantage and, generally, machines in such area have a higher turnover. Some jurisdictions have moved to address this distribution issue. While acknowledging that this is a complex issue the TGC believes the Government should undertake further analysis of options to arrest and reverse the placement of EGMs in socially and economically vulnerable communities.

The SEIS report suggests that young men are particularly vulnerable to problem gambling and that, amongst them, those who come from families with a history of gambling are most at risk. It appears that risky gambling attitudes and beliefs emerge amongst this group in early teenage years and any behaviour change interventions are best directed at this group at this time. The TGC acknowledges that a program is currently operating within Tasmanian schools but considers greater effort would be beneficial in curbing the development of problem gaming in this target group.

8. *The public discourse around gaming, especially around EGMs, has not been well informed.*

The TGC believes that much of the debate in this area has been diverted into unprofitable commentary on Government's so called 'addiction' to gambling taxation revenue, the apparently inalienable rights of the recreational gambler and poorly thought through 'fixes' - ranging from immediate abolition of EGMs to 'smart cards' - as the saviour of the problem gambler. All of these issues are worthy of debate but would benefit enormously from better information and more structured commentary.

9. *Additional targeted research and evaluation of current and future interventions would be of value.*

The TGC sees merit in further research on gaming in Tasmania and evaluation of interventions to address problem gambling. We currently do not have accurate information about how much problem gamblers in Tasmania contribute to the total gaming turnover so judgements are based on national or international data. While it is reasonable to assume such estimates are applicable in Tasmania, it would improve debate if sound local research results were available. The same can be said of considerations of the 'tolerance' of recreational gamblers to further interventions to reduce problem gambling.

The TGC is not, however, of the opinion that further policy responses need be deferred indefinitely until such a local evidence base is complete. A lack of conclusive evidence can be used as an excuse to do nothing.

10. *There is no group within Government providing 'whole of government' social policy advice on gaming issues.*

Gambling is a complex subject and one deeply bedded in the Australian psyche. Gambling is an economic issue, a health issue, an industry issue, a community infrastructure issue, a revenue issue, a research issue and, to many, an ethical issue. The TGC believes that the current arrangements of advice to Government, while individually professional, are fragmented and do not promote a 'whole of government' consideration. If the Tasmanian community is to better understand gambling issues and engage in a more constructive debate then different administrative arrangements for the development and coordination of policy advice to Government should be considered. In this the TGC believes that the New Zealand approach to gaming as a 'public health' issue warrants further analysis and consideration.

Summary

The TGC acknowledges that providers of gaming services and related industry groups will continue to argue that there is no need for additional interventions, particularly where such interventions might diminish the enjoyment of the recreational gambler. They will further argue that if such interventions are to be considered by Government that their efficacy must be absolutely proven before they are implemented.

The TGC acknowledges that the evidence base available is incomplete and not based particularly in Tasmanian circumstances. However the TGC is firmly of the opinion that there is enough evidence available to strongly suggest that:

- problem gambling is a significant issue here in Tasmania;
- the number of problem gamblers is underestimated;
- EGMs are the most dangerous mode of gaming especially for those individuals most likely to become problem gamblers;
- such gamblers contribute disproportionately to EGM turnover and losses;
- there are a range of policy options available to Government that would result in interventions that would reduce the losses of problem gamblers;
- recreational gamblers may well be more tolerant of additional interventions than has been implied by some parties – particularly if they are aware of the reasons behind them; and
- a secondary result of such interventions would be a decline in the profitability of the gaming industry and gambling tax revenue to Government.

A SPECIFIC FOCUS ON EGMs

As stated above, in formulating this response the TGC's focus has been on EGMs as it is this form of gaming that presents the greatest risk of harm and is the most complex to deal with in terms of consumer education and information. It is also the product most likely to be used by those with the least capacity to assess risk or manage the results of failure. There are also implications from the findings of the SEIS report in relation to the association between disadvantage and the regional/geographic concentration of EGMs.

In seeking to advise the Treasurer on the broader issues of consumer protection and limiting the harm to those whose engagement with EGMs is problematic, the Commission is of the view that:

- consumers should be in a position to make a reasonably informed decision on whether or not they wish to engage in the activity, and that this should include simple information on the likelihood that they will be successful or unsuccessful; and
- a more interventionist approach is required at the point of consumption and at the point of 'treatment' when the actions of the consumer cross the boundary, or approach the boundary, of addictive/problematic behaviour.

For ease of reference in the following, the Commission has classified consumer protection and harm minimisation policy responses under five main headings:

- **Traditional Consumer Protection Measures** (for example, general advertising campaigns focussed on the risks of gambling, campaigns focussed on particular at-risk groups [young males aged 12-15 years], information on likelihood of losses/wins, etc).
- **Traditional Interventions targeting Individual Problem/At Risk Gamblers** (for example, exclusion schemes, help-lines, treatment services, family support services, limitations, prohibitions on ATMs and note acceptors, permitting only low value note acceptors, etc).
- **Enhanced Interventions targeting Individual Problem/At Risk Gamblers** (for example, enhanced [perhaps card-based] exclusion schemes, active intervention by paid staff with those exhibiting problem behaviours, improved and more intensive treatment services including residential services that target problem gamblers; garnishment of wages or welfare payments on a voluntary or involuntary basis, intensive intervention into families with an inter-generational history of gambling, etc).
- **Machine-based Changes to Limit Loss / Attractiveness** (for example, reductions in spin rates, reductions in wagering lines, reductions in bet limits and prizes, reducing the visual and aural impacts of machines, losses clearly shown against wins, prominent analogue clocks indicating length of play, etc).
- **Access-based Interventions** (for example, machine shutoffs after fixed periods to interrupt continuous play, limits on the total hours of opening of venues, mandated shutdown period for all machines, limiting the movement of EGMs to local government areas with low socio-economic profiles, giving local governments the opportunity to comment on plans to move machines, smart card technology, etc).

Possible new policy responses to address problem gambling, those at risk of developing a gambling problem, and consumer protection in Tasmania

There are a range of measures currently in place in Tasmania that address the issues of problem gambling, those at risk of developing a gambling problem, and consumer protection. These are detailed at Appendix 1.

Some issues need to be understood when considering any new measures:

- It is currently very difficult to change the National Standards that define the technical and performance parameters of EGMs. The agreement of all jurisdictions is required to make changes and, even if this were to be achieved, such agreement might take up to two years. If Tasmania opts to act alone, we would be isolated in terms of assessment of EGMs and related systems and the industry may find it very difficult (and expensive) to obtain EGM games that cater only for a Tasmanian regulatory market. At present, this State has aligned its assessment processes to those carried out by Queensland authorities (QCOM); any moves to isolate Tasmania from the National Standards would also increase the cost of assessing and regulating games for Government.

- Current differing regulatory requirements for casinos as compared to hotels and clubs. For instance:
 - There is no restriction on ATM's or EFTPOS transactions at a casino, while ATM's are banned and EFTPOS is restricted to one transaction per day for gaming purposes at hotels and clubs;
 - There is no maximum bet limit on casino EGMs, while EGMs in hotels and clubs have a maximum bet limit of \$10 per spin;
 - Note acceptors are permitted to operate on EGMs in a casino, while note acceptors are banned in hotels and clubs;
 - There is currently no specific cap on EGMs in casinos, while there are specific limits on the number of EGMs that can be located in hotels and clubs; and
 - There is no requirement for a casino operator to contribute to the CSL, while a hotel and club gaming operator is required to contribute 4% of EGM gross profit to the CSL.
- Measures, particular machine-based, are likely to be more effective in combination than if implemented independently (for example, spin rates, credit limits, time outs). If changes are made piecemeal, then problem gamblers are more likely to be able to adjust their playing behaviour or gamble for longer to compensate.

Depending on whether the Government wants to take a stronger position on problem gambling and harm minimisation, there are measures that could be implemented now by the Commission, under a direction from the Treasurer, to introduce measures that strengthen the responsible conduct of gaming, reduce the harms associated with problem gambling and provide additional protections to consumers.

There are also measures that would require legislative change or negotiation with other jurisdictions (in relation to the National Standards for Gaming Machines) that are not easily amenable to quick implementation.

The Commission has identified a range of consumer protection and harm minimisation strategies which have, for ease of understanding, been divided into the five main headings noted above (traditional consumer protection measures, traditional interventions targeting individual problem gamblers, enhanced interventions targeting individual problem, machine-based changes to limit loss / attractiveness, and access-based interventions). The Commission has also identified the potential timeframes in which these strategies could be implemented, and has also categorised the strategies into the following broad areas:

1. measures that do not materially affect recreational gamblers,
2. measures that marginally affect recreational gamblers, and
3. measures that more significantly affect recreational gamblers.

Details of all potential strategies are given in Appendix 2.

Harm Minimisation and Consumer Protection Measures Currently in Place in Tasmania

	Measure Description	Benefit	Scope for change ✓ = potential to enhance measure, see Appendix 2 ✗ = no change
	Access Based		
	Entry of minors restricted: Minors must not enter or remain in a restricted gaming area and must not participate in gaming. Venue operators must not allow minors to enter a restricted gaming area, must remove minors and must not allow minors to participate in gaming. A person must not place a wager on behalf of a minor. Penalties (court imposed) range between \$1 200 and \$6 000.	Recognises significant nature of a breach.	✓
	Hours of operation limited in clubs and hotels: The Commission Rules state that gaming can only be conducted during the hours of operation specified in the liquor licence or permit. A maximum of 20 hours gaming within a 24 hour period is allowed, with at least four continuous hours when EGMs and Keno are not in use.	An enforced break of four hours per day.	✓
	Hours of operation limited in casinos: The casino "Internal Control and Accounting Manual" set the maximum standard hours for gaming machines between 9 am and 5 am. The casino may apply in writing to the Commission to extend these hours with potential for 24 hour operation of gaming.	An enforced break of four hours per day.	✓
	Quantity restrictions (venue specific): Number of EGM capped at 40 for individual clubs and 30 for individual hotels. These amounts are specified in the 2003 Deed of Agreement.	Limits the availability of machines in each venue.	✓
	Quantity restrictions (state specific): State-wide cap of 2 500 for hotels and clubs and a cap on total machines in Tasmania of 3 680 including casinos, but excluding the TT-Line ferries. These amounts are specified in the 2003 Deed of Agreement.	Limits the availability of machines in 1, hotels and clubs, and 2, state-wide.	✓
	Traditional Consumer Protection		
	Gaming staff to be licensed: The GCA requires that all gaming staff be licensed. Staff are subject to probity investigations (criminal and financial record) and must be trained in Responsible Conduct of Gaming. Provides assurances that staff are suitable. Provides ability to take disciplinary measures against staff who fail to do the right thing.	Minimises the risk that gaming staff will commit offences and allows disciplinary action to be taken.	✗

	Measure Description	Benefit	Scope for change ✓ = potential to enhance measure, see Appendix 2 ✗ = no change
	Smoking prohibited in gaming areas: The <i>Public Health Act 1997</i> prohibits smoking in a smoke-free area (section 67C). The description of smoke-free area includes an enclosed public place and an enclosed workplace (section 67B). Despite an almost instantaneous slump in revenue on the introduction of the ban, revenues have climbed back to what could be called normal levels within three years.	Players and staff better off in a smoke free environment.	✗
	Gaming staff trained in Responsible Conduct of Gaming: Special employees are trained in RCG (completion of the course within three months of obtaining a licence is a licence condition). A new RCG course is being developed and will be delivered by Registered Training Organisations.	Ensures that staff are trained in responsible gambling principles.	✗
	Payment of winnings: In hotels and clubs winnings up to \$2 000 must be paid on the day, with a minimum of \$500 in cash. Winnings in excess of \$2 000 must be paid within one business day either by cash or cheque. Winnings in excess of \$3 000 on Keno must be collected by the customer from a casino.	Prevents at risk/problem gamblers from reinvesting their winnings received in cash in further gambling.	✓
	Educational campaigns: Current community education prevention initiatives seek to build awareness and resilience with those who are not yet gambling and those who are not gambling problematically. Intervention initiatives promote information and services available to problem gamblers and those affected by another person's gambling. Community Education aims to address those most at risk and to cover all major gambling forms. The program includes standard brochures, education kits as well as more targeted activities informed by research such as prevalence studies, best practice, monitoring flow of calls to help lines etc. Programs are run by DHHS. DHHS and the Department of Education have also produced a teaching kit for Tasmanian high schools Year levels 7/8 called <i>What's the Real Deal?</i> The kit is designed to assist teachers to educate young people about the risks and potential problems associated with gambling, supporting students to make informed choices and identify warning signs of problem gambling in themselves and others. The kit examines odds, beliefs and superstitions about gambling, the pathways to problem gambling and the help available, the role of advertising in influencing gambling choices, and the interests of the different stakeholders in the gambling sector.	Raises the profile of problem gambling as an issue across the general population.	✓
	Warnings on machines: Section 121 of the Act specifies that warnings must be erected in relation to minors and restricted gaming areas and operating gaming machines, and the penalties that apply.	Raises the profile of problem gambling as an issue across the general population. Relatively low cost.	✓

	Measure Description	Benefit	Scope for change ✓ = potential to enhance measure, see Appendix 2 ✗ = no change
	Advertising restrictions on gambling products: Provisions are contained in a voluntary code of conduct administered by the Gambling Industry Group.	Minimises harm if requirements are adhered to.	✓
	Penalties for breaches of exclusion notices under the <i>Gaming Control Act 1993</i>: Significant penalties already exist but are rarely applied due to the sensitivities and complexities surrounding problem gambling behaviour (e.g. exclusion breaches).	Recognises significant nature of a breach.	✓
	Operational code of practice for the gaming industry: Provisions are currently contained in a voluntary code of practice administered by the Gambling Industry Group. Matters relate to customer comfort and services, patron care, service of alcohol and resolving complaints.	Minimises harm if requirements are adhered to.	✓
	Clocks displayed in venues: This provision is contained in a voluntary code of practice administered by the Gambling Industry Group.	Minimises harm if requirements are adhered to.	✓
	Compulsory electronic surveillance in all gaming venues: All venues have met this requirement in advance of the July 2009 deadline. This provides an improved ability to identify excluded patrons, undertake investigations and react to complaints.	Protects venues, patrons and assists Government investigations.	✓
	Limitations on serving alcohol to persons participating in gaming who appear to be drunk: The Voluntary Code of Practice states that venues are committed to responsible service of alcohol and do not condone patrons playing while intoxicated. If clearly intoxicated patrons will be prevented from utilising gambling services and may be removed from the venue.	Protects players from gambling excessively due to intoxication.	✓
	Machine Based		
	Ban note acceptors on EGMs: The Australian/New Zealand Gaming Machine National Standards - Tasmanian Appendix Version 9.01 prohibits the use of note acceptors in hotels and clubs.	Ensures that notes are not "fed into" machines and limits the rate at which money may be lost.	✗
	EGM auto play: A feature that allows game play without manually pressing a button for each game. Any continuous play caused by holding down or physically jamming the player interface is also considered auto play. The Australian/New Zealand Gaming Machine National Standard requires that each game play requires a separate and distinct button press.	Ensures that players are unable to hold down play button and play continuously or play more than one machine at a time.	✗
	EGM non linear pay tables restricted: The Australian/New Zealand Gaming Machine National Standards - Tasmanian Appendix Version 9.01 prohibits the use of non linear pay tables (i.e., one that has a higher prize when played for a higher bet value). This feature is considered to be unfair to players as it is likely to encourage them to bet higher amounts.	Ensures that betting higher amounts is not encouraged and RTP remains consistent.	✗

	Measure Description	Benefit	Scope for change ✓ = potential to enhance measure, see Appendix 2 ✗ = no change
	EGM game design winning combination display "near miss": The Australian/New Zealand Gaming Machine National Standard prohibits an EGM game from displaying biased "near misses".	Prohibits the display of a game outcome in a misleading or deceptive way.	✗
	EGM "winning" audible affirmation on net loss: The Australian/New Zealand Gaming Machine National Standards - Tasmanian Appendix Version 9.01 requires close regulatory scrutiny where an EGM produces an audible affirmation where a net loss occurs in any one game play and any display of "congratulatory" messages is prohibited.	Reduces the "attractiveness" of a machine by removing a significant element of the reinforcement message. Provides accurate information to all players about their net position.	✓
	Cash input limits on EGMs: The Australian/New Zealand Gaming Machine National Standard prevents any further cash being inserted into an EGM once its credit meter exceeds \$9 899.	May cause problem gamblers to slow the rate of gambling and prevent large losses from one loading of credit.	✓
	Gamble feature limit on EGMs: A game option that may be selected after a win such as "double up" where some or all winnings may be gambled at 100 per cent return (i.e., winnings gambled are either doubled or lost). The Australian/New Zealand Gaming Machine National Standard permits a maximum of five consecutive "gamble" attempts per win.	Players are less likely to "gamble" and lose all winnings.	✓
	Player information displays (PIDS) on EGMs: The Australian/New Zealand Gaming Machine National Standard - Tasmanian Appendix Version 9.01 requires gaming machine games to display a range of statistics including: 1. casinos: • session win, loss and time information • return to player Information • odds of winning top five and bottom five prizes 2. hotels and clubs: • maximum loss rate • odds of winning the top prize	Provides consistent information to players across all machines.	✓
	Rate of loss - bet limits on EGMs in hotels and clubs: The Australian/New Zealand Gaming Machine National Standard - Tasmanian Appendix Version 9.01 currently limits the maximum bet amount to \$10 per spin in hotels and clubs.	Limits the amount of money that can be gambled per spin.	✓

	Measure Description	Benefit	Scope for change ✓ = potential to enhance measure, see Appendix 2 ✗ = no change
	EGM return to player: The players' proportion of the total amount wagered. Section 144 of the Act requires that the minimum return to player percentage is not less than 85 per cent, applicable for all venues. Actual RTP is higher than the required 85 per cent minimum (casinos within a range of 87-95 per cent, with an average of 89.79 per cent and clubs and hotels within a range of 87-94 per cent, with an average of 88.94 per cent).	Information is available through player information displays.	✓
	EGM Jackpots: Section 84 of the <i>Gaming Control Act 1993</i> provides for the approval of EGM jackpots and linked jackpot arrangements.	Requirements for Commission approval ensures an element of control over jackpots.	✓
	Maximum lines/ways that can be played on an EGM: The Australian/New Zealand Gaming Machine National Standard - Tasmanian Appendix Version 9.01 currently limits the number of available lines that an EGM game can offer to 50 lines. There is no limit on the number of ways games that an EGM can offer.	Limits the amount of lines (and therefore credits) a player can gamble on per spin.	✓
	Game duration on EGMs: The Australian/New Zealand Gaming Machine National Standard - Tasmanian Appendix Version 9.01 currently limits the minimum game duration (spin rates) for an EGM to three seconds per game (spin).	Limits how quickly a player can gamble.	✓
	Traditional Interventions Targeting Individual Problem/At Risk Gamblers		
	Exclusion provisions: Section 112 of the Act currently provides for a range of exclusion methods (self, venue, third party and police). With the exception of police exclusions, these provisions are designed to assist problem gamblers to manage their behaviour by restricting their ability to access gambling facilities. Police exclusions are rarely used but typically allow for police to exclude people suspected of being involved in crime.	Provides a way for people to remove themselves from gambling venues and seek help, and a way for other people to remove a person from a gambling venue.	✓
	Community Support Levy: Hotels and clubs currently contribute 4 per cent of monthly gross profits derived from EGMs towards the CSL. The CSL funds are distributed for the benefit of sport and recreation organisations, charitable organisations and a range of problem gambling support services.	Provides a funding source for the benefit of those with a gambling problem and for wider community benefit.	✓
	Gambling on credit prohibited: Section 94 of the Act prohibits a licence holder extending credit or making a loan to any person for gambling purposes (penalty \$12000). Under this section the Commission has notified each casino that it is able to hold a customer's cheque for a period of 16 days before it needs to be banked. For hotels and clubs the Commission Rules allow one cheque per person per day to be cashed (there are no restrictions in place in relation to the period for which they are able to hold a customer's cheque).	Limits use of credit for gambling.	✓

	Measure Description	Benefit	Scope for change ✓ = potential to enhance measure, see Appendix 2 ✗ = no change
	Help lines: The Gambling Helpline Tasmania provides 24 hour free and confidential support, information and referrals to local area counselling services. The current operator is Turning Point Alcohol and Drug Centre, based in Melbourne.	Provides immediate assistance to people needing help.	✓
	Treatment services: The Break Even Network Services provide personal and financial counselling for individuals and families. Services are currently free and confidential. Providers are Anglicare Tasmania and Relationships Australia.	Provides assistance to people needing help.	✓
	Cash access (ATM and EFTPOS) limits in hotels and clubs: Commission Rules prohibit ATMs in hotels and clubs and limit EFTPOS transactions for gaming to one per person per day. No access to credit accounts or credit cards.	Limits access to cash when gambling.	✓
	Cash access (ATMs) limits in casinos: Commission Directions currently specify the number, signage and location of ATMs in casinos.	Limits access to cash when gambling.	✓
	Additional Research		
	Independent review of the social and economic impact of gambling in Tasmania: Required by the Act every three years.	Ensures trend data maintained and provides an opportunity to undertake research into specific areas.	✓

Traditional consumer protection measures

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
<p>Payment of winnings</p> <p>Current payment limits on the amount of cash that can be paid directly to gamblers do not impose a maximum amount that could be paid in cash for EGM wins by a hotel or club and do not apply to casinos. Impose maximum cash payout amounts for all winnings (Keno and EGM) in hotels, clubs and casinos to prevent problem gamblers reinvesting large cash amounts back into EGMs.</p>	✓	x	\$	S	TGC
<p>Educational campaigns</p> <p>Community Education program targeted at specific at-risk groups, including young males, people aged 18-29 years, on loyalty card holders, and on those living in the Greater Hobart area.</p>	✓	x	\$\$	S	TGC / DHHS
<p>Clocks displayed in venues on the wall</p> <p>Provisions are currently contained in a voluntary code of practice administered by the Gambling Industry Group. Could be mandatory.</p>	✓	x	\$	S	TGC / Legn
<p>Warnings on machines</p> <p>Under the Gambling Industry Group Voluntary Code, helpline signage is only required in clubs and hotels. This could be extended to the casinos, with minimum standards around placement, size of warning, wording, etc for all venues.</p> <p>Additional warnings to be placed on all gaming machines highlighting the "dangers" of gambling. This could include an electronic scroll message at the bottom of each screen (as in Qld).</p>	✓	x	\$	S-M	TGC / Legn
<p>Advertising restrictions on gambling products</p> <p>Potential to tighten requirements in Gambling Industry Group Voluntary Code and consider alternative models (e.g., co-regulation and mandatory approach including disciplinary action for breaches). Introduce a statutory provision to make an advertising code of practice mandatory.</p>	✓	x	\$	S-M	TGC / Legn
<p>Statutory obligation on the regulator to foster responsible gambling and minimise problem gambling</p> <p>Amend the Act to include TGC role in relation to policy advice and development, harm minimisation, consumer protection, facilitation of responsible gambling.</p>	✓	x	\$	S-M	Legn
<p>Inducements prohibited (e.g., food, drinks or free games)</p> <p>Introduce mandatory restrictions on inducements such as vouchers for discounted or free alcohol, free gaming credits, food, grocery giveaways, etc (rather than the voluntary restrictions currently contained in the Gambling Industry Group Voluntary Code).</p>	x	x	\$	S-M	TGC / Legn

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
<p>Service/consumption of alcohol and food while participating in gaming prohibited</p> <p>Ban on service of alcohol and food to any person gaming or using an EGM (to induce a forced break)</p>	x	x	\$	S-M	TGC / Legn
<p>Penalties for breaches of exclusion notices under the Gaming Control Act 1993</p> <p>Significant penalties already exist but are rarely applied due to the sensitivities and complexities surrounding problem gambling behaviour.</p> <p>Move to Community-based Orders to enforce exclusion provisions.</p>	✓	✓	\$	M	Legn
<p>Lighting in gaming areas</p> <p>Introduce minimum standards so that all signage is easy to read.</p>	✓	x	\$	M	TGC
<p>Operational code of practice for the gaming industry:</p> <p>Provisions are currently contained in a voluntary code of practice administered by the Gambling Industry Group. Matters relate to customer comfort and services, patron care, service of alcohol and resolving complaints.</p> <p>Codes of practices can include sets of principles to ensure that gaming is operated in a way to minimise the harm. Review current requirements and rewrite the code incorporating new matters if appropriate and review the method of enforcement, e.g., consider alternative regulatory models, such as a mandatory code or a co-regulatory or partnership approach between industry and Government. Object of codes would be to conduct gaming in a manner that will minimise harm to consumers.</p>	✓	x	\$	M	TGC / Legn
<p>Compulsory electronic surveillance in all gaming venues</p> <p>Introduce sophisticated face recognition surveillance technology to identify problem gamblers.</p>	✓	xx	\$\$	M	TGC / Legn

Legend

Impact on Recreational gamblers	✓ = no impact	x = minor inconvenience	xx = major inconvenience	xxx = significant and substantial impact
Impact on Industry	✓ = no impact	x = some (minor) impact	xx = major impact	xxx = significant and substantial impact
Cost	✓ = no cost	\$ = minor costs	\$\$ = major costs	\$\$\$ = significant and substantial costs
Timeframe	S = 1-6 months	S-M = 6-12 months	M = 12-18 months	M-L = 18-36 months L = > 3 years
Action	TGC = implemented by the TGC under direction from the Treasurer		Legn = implemented by amendment to the GCA	DHHS = implemented by DHHS

Traditional interventions targeting individual problem gamblers

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
<p>Help lines</p> <p>The Gambling Helpline Tasmania provides 24 hour free and confidential support, information and referrals to local area counselling services. The current operator is Turning Point Alcohol and Drug Centre, based in Melbourne. The SEIS found that awareness of help lines is low.</p> <p>Improve the awareness of, and review the effectiveness of help line services.</p>	✓	✓	\$\$	S-M	DHHS
<p>Gambling on credit prohibited</p> <p>Section 94 of the Act prohibits a licence holder extending credit or making a loan to any person for gambling purposes. One avenue around this prohibition is to not bank a cheque (up to 16 days in the case of casinos) to allow a gambler to redeem the cheque or obtain funds to cover the cheque. Restrict any opportunities to credit bet using cheques that are not banked for a significant period by requiring all venues to bank any cheques by the close of the following business day.</p>	x	x	\$	S-M	TGC
<p>Treatment services</p> <p>The Break Even Network Services provide personal and financial counselling for individuals and families. Services are currently free and confidential. Providers are Anglicare Tasmania and Relationships Australia.</p> <p>Improve the awareness of, and review the effectiveness of treatment services.</p> <p>Improve and intensify services (e.g., residential services that target high end problem gamblers, intervention into families with an inter-generational history of gambling).</p>	✓	✓	\$\$\$	M	DHHS
<p>Exclusion provisions</p> <p>Implement the remaining recommendations of the TGES Review (completed in 2007).</p> <p>Improve the administration of the current exclusions program (for example, mandate minimum and maximum periods for self exclusion, limit to either the whole venue or participating in all types of gambling offered in a venue, disallow excluded persons entry into any restricted gaming area).</p>	✓	x	\$	M	TGC / Legn
<p>Cash access (ATM and EFTPOS) limits in hotels and clubs</p> <p>Commission Rules prohibit ATMs in hotels and clubs and limit EFTPOS transactions for gaming to one per person per day. No access to credit accounts or credit cards.</p> <p>Introduce new Direction to hotels and clubs:</p> <ul style="list-style-type: none"> • No EFTPOS cash out for gaming, or • No EFTPOS cash out at all. 	x	x	✓	M	TGC / Legn

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
<p>Cash access (ATMs and EFTPOS) limits in casinos</p> <p>Commission Directions prohibit ATMs in hotels and clubs, and limit EFTPOS in hotels and clubs transactions for gaming to one per person per day. No access to credit accounts or credit cards. There are no limits on EFTPOS transactions in casinos.</p> <p>Introduce new Direction to casinos:</p> <ul style="list-style-type: none"> • One EFTPOS transaction for gaming per person per day, or • No EFTPOS cash out for gaming, or • No EFTPOS cash out at all. 	x	xx	✓	M	TGC / Legn
<p>A problem gambling strategy</p> <p>Develop and publish a problem gambling strategy (similar to Qld and Vic) that provides an overarching statement to combat problem gambling and fund an integrated, whole-of-government approach (setting priorities, measuring progress, etc).</p>	✓	x	\$\$	M-L	TGC / Legn
<p>Community Support Levy</p> <p>Introduce a requirement for casinos and Betfair to contribute towards the CSL, and / or increase the current 4 per cent rate of contribution to fund a problem gambling strategy.</p>	✓	xx	✓	M-L	Legn

Legend

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Cost	✓ = no cost	\$ = minor costs	\$\$ = major costs	\$\$\$ = significant and substantial costs
Timeframe	S = 1-6 months	S-M = 6-12 months	M = 12-18 months	M-L = 18-36 months L = > 3 years
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Enhanced interventions targeting individual problem/at risk gamblers

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
Gambling Liaison Officer Introduce requirement that specified gaming staff in all venues (or in particular parts of venues) are trained in active intervention, to be on-call to assist when a person exhibits problem gambling behaviours.	✓	xx	\$\$	M	TGC / Legn
EGM Smart Card / Card Based Gaming Technology Introduce mandatory card based gaming to provide players with the ability to pre commit to loss levels, playing time etc. Smart card technology could also be used to enhance the current player exclusion provisions. Note – there is currently no smart card technology operating successfully in Australia.	xx	xx	\$\$\$	L	TGC / Legn

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Timeframe	S = 1-6 months	S-M = 6-12 months	M = 12-18 months	M-L = 18-36 months L = > 3 years
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Machine-based changes to limit loss / attractiveness

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
EGM return to player Educate machine users / the general public on how Return to Player is calculated and where to get information (e.g., through player information displays currently available on machines).	✓	x	\$	S-M	TGC
Cash input limits on EGMs Reduce current limit on credit meters from \$9 899 to \$100.	✓	✓	\$	M	TGC
EGM "winning" audible affirmation on net loss Restrict any audible affirmation where any net loss occurs and remove any visible suggestion that a net loss is a "win".	✓	x	\$	M	TGC
Player information displays (PIDS) on EGMs Currently only casino-based gaming machine games are required to display a range of statistics to the player including, Session Win, Loss and Time information, Return to Player Information, and odds of winning top five and bottom five prizes. Increase the hotel and club PID requirements to be the same as the requirement for casino games.	✓	x	\$	M	TGC
Clocks (preferably analogue) to be displayed to indicate length of play Require an analogue / digital display of the amount of time spent on any particular machine	✓	x	\$	M	TGC
Rate of loss - bet limits on EGMS in hotels and clubs Reduce the current maximum bet amount of \$10 per spin in hotels and clubs to \$5 per spin (the same as Vic and Qld).	✓	x	\$	M	TGC
Rate of loss - bet limits on EGMs in casinos Introduce bet limits for EGMs in casinos at the same rate as per hotels and clubs.	✓	x	\$	M	TGC
EGM player loyalty systems/programs Introduce restrictions/requirements on the nature of player loyalty systems/programs similar to those imposed by other jurisdictions (setting loss limits, providing activity statements).	✓	xx	\$\$	M	TGC
Gamble feature limit on EGMs Gamble features include the ability to play "double or nothing" after a win. Currently there are five consecutive gamble attempts at "double or nothing" per single play that may be made following a win. Reduce the number of times to one.	x	x	\$	M	TGC
Restrict / Ban note acceptors on EGMs Note acceptors are prohibited in hotels and clubs only. Restrict the use of note acceptors in casinos (e.g., place limits on the denominations that could be used). Prohibit the use of note acceptors in casinos (introduce a ban	x	xx	\$\$	M	TGC

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
with a phase-in period)					
Enforced player breaks Introduce pop up messages at regular intervals or a machine shut down after a large win, giving people time to rethink gambling before returning to play. Require a machine to automatically shutdown on recognition that one particular player has been playing a particular machine for a certain period of time.	x	x	\$	M	TGC
Maximum lines/combinations that can be played on an EGM and game duration on EGMs Reduce the current maximum of 50 lines to 25 and introduce a limit on the number combinations that an EGM can offer as a win and increase the maximum game duration period (spin rate) above 3 seconds. All these measures are designed to reduce the illusion that a game feature (such as a free spin) is "due".	x	x	\$	M	TGC
EGM Jackpots Restrict the number of jackpots that can be operated.	x	xx	\$\$	M	TGC
EGM and EGM game design Restrict the visual and/or aural impact of EGMs in venues.	xx	xx	\$\$	M	TGC

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Access-based interventions

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
<p>Hours of operation limited in casinos, clubs and hotels</p> <p>Mandate (and increase) breaks in trading from four to six continuous hours (venues could choose the hours) or specify the times between which the break will occur, e.g., from 2 pm until 6 pm. Could also specify days during which gaming is prohibited, e.g., Christmas Day and Good Friday.</p>	x	xx	\$	S	TGC
<p>Entry of minors restricted</p> <p>The Act only imposes requirements on venue operators to prevent minors from entering gaming areas. There is potential to impose this requirement on all gaming staff, not just the operator. There may also be potential for the penalty amounts to be increased. Under the <i>Liquor Licensing Act 1990</i> both the employee and licensee may be fined if the employee sells liquor to a young person or a person appearing to be drunk (licensee fine: \$12 000 and employee fine: \$6 000).</p>	✓	x	\$	M	Legn
<p>Machine shutdowns (e.g., individual machine after a fixed period of play or for all machines at certain times of the day)</p> <p>Compulsory shutdown periods for EGMs in a venue either at random or during certain times of the day. Length of time could be the same, but may not necessarily have to happen at the same time of the day for each EGM.</p>	✓	x	\$	M	TGC
<p>Social impact assessment for the introduction or movement of EGMs</p> <p>Introduce a requirement to conduct impact assessments when machines are moved or new machines are introduced. Give local government the opportunity to comment on the plan for venues in the region.</p>	xx	xx	\$\$	M	Legn
<p>Restrictions on numbers of EGMs per venue</p> <p>Number of EGMs currently capped at 40 for individual clubs and 30 for individual hotels. These amounts are specified in the 2003 Deed of Agreement. Reduce the caps for individual hotels and clubs. Consider reduced number for venues in areas with a lower socio economic profile.</p>	xxx	xxx	\$	L	Legn

Measure	Impact on Recreational gamblers	Impact on Industry	Cost	Timeframe	Action
Restrictions on numbers of EGMs across the state / across regions Reduce the state-wide cap for hotels and clubs and reduce the cap on total machines. Introduce regional requirements e.g., cap the number of EGMs per 1000 adults, introduce a requirement to conduct impact assessments when machines are moved or new machines are introduced and give local government the opportunity to comment on the plan for venues in the region, and consider a reduced number for venues/machines in areas with a lower socio economic profile.	xxx	xxx	\$\$	L	Legn

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