

24 June 2022

Ms. Melissa Ford
Assistant Director
Liquor & Gaming Branch
Department of Treasury and Finance
GPO Box 1374
HOBART TAS 7001

Via email: consultation.lagb@treasury.tas.gov.au

Dear Ms Ford,

Tabcorp Holdings Limited (**Tabcorp**) appreciates the opportunity to respond to the Second Review of the Responsible Gambling Mandatory Code of Practice for Tasmania (the Code) consultation paper on behalf of its wagering and gaming licensees.

About Tabcorp

Tabcorp is a world-class diversified gambling entertainment group employing more than 3,000 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.

Harm Minimisation

Tabcorp is 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%)¹. 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.

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

Tabcorp's response to the Review

Tabcorp notes that this review is occurring as the gambling industry undergoes significant reform in Tasmania and the focus of this review is on the areas of the Code relating to advertising, inducements and player loyalty programs only for licensed venues with electronic gaming machines (EGM).

¹ 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

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As a general comment any regulation should be commensurate with the risk or harm it is trying to manage, providing a balanced and tiered approach to drive better regulatory outcomes. It is also important that for a sustainable gambling industry, Tabcorp believes the regulatory framework should be technology-agnostic to enable the flexibility to respond to emerging technology and avoid bespoke Tasmanian-only infrastructure and approvals.

As the Commission is aware, Tabcorp does not operate licensed venues with EGMs in Tasmania – as such the specific questions in the consultation paper are not relevant for our operations. If the Commission determines to make amendments to the Code only for licensed venues with EGMs it will be critical that these amendments are drafted to only apply to these venues and this type of gambling.

If it is proposed in the future to review advertising, inducements or player loyalty programs for other forms of gambling such as wagering Tabcorp would appreciate the opportunity to provide feedback on any proposed changes at that time.

We would welcome the opportunity to discuss our response further and to be involved in future industry consultation that occurs in relation to the Code. Please do not hesitate to contact me on 03 9868 2256 or alison.tehan@tabcorp.com.au if you require any further information.

Yours sincerely,



Alison Tehan
Head of Regulatory Strategy

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