



Tasmanian Council of Social Service Inc.

Submission: Player Card and Cashless Gaming

October 2024



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About TasCOSS

TasCOSS' vision is for one Tasmania, free of poverty and inequality where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry in Tasmania; and to challenge and change the systems, attitudes and behaviours that create poverty, inequality and exclusion.

Our membership includes individuals and organisations active in the provision of community services to Tasmanians on low incomes or living in vulnerable circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

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Introduction

TasCOSS welcomes the opportunity to respond to the Consultation Paper for the introduction of the Player Card and Cashless Gaming in Tasmania.¹

TasCOSS's Previous Submissions and Media Statements

This submission builds on previous submissions and comment made by TasCOSS on gaming, including:

- [TasCOSS Media Release: Delay in pre-commitment gaming card will increase harm](#) (3 July 2024).
- [2024 Tasmanian State Election Joint Statement on Poker Machines in Tasmania](#) (March 2024).
- [TasCOSS Submission on Gaming Control \(Community Support Fund\) Regulations 2022](#) (June 2022).
- [TasCOSS Submission on the Gaming Control Amendment \(Future Gaming Market\) Bill 2021](#) (August 2021).
- [TasCOSS Survey Questions | Allocation of Community Support Levy Funding under the Future Gaming Market](#) (July 2021).

In the *2024 Tasmanian State Election Joint Statement on Poker Machines in Tasmania*, TasCOSS joined with 20 community services organisations, unions, and others including Independent Member for Clark, Kristie Johnson MP, to call on parties and candidates to commit to:

1. Completing the implementation of the universal, pre-commitment card with the four essential features, as recommended by the Tasmanian Liquor and Gaming Commission (TLGC).
2. Introducing safer electronic gaming machine (EGM) design features, including:
 - \$1 bet limits;
 - Slower spin speeds (six seconds);
 - Prohibiting 'losses disguised as wins';
 - Smaller jackpots;
 - Higher return to player; and
 - Reduced opening hours for poker machine (EGM) venues.

¹ [Player Card and Cashless Gaming | Treasury and Finance Tasmania](#).

Support for a Mandatory Cashless Player Card

Support for a Mandatory Cashless Player Card

TasCOSS welcomes the Tasmanian Government's commitment to implement a mandatory account-based cashless card system for EGM play in Tasmanian hotels, clubs and casinos with the following features:

- A common statewide player account for all EGM play, regardless of venue and venue type (i.e. hotel, club or casino);
- Default pre-commitment limits with a simple change process up to a set limit;
- A comprehensive process to increase pre-commitment above the set limits; and
- Statewide cashless gaming.

We believe that this system will help to reduce harm to people who gamble on EGMs in Tasmania.

Endorsement of Anglicare Tasmania's Submission to this Consultation

TasCOSS endorses the submission made by Anglicare Tasmania to this consultation process (including their five recommendations and additional input on the certification process for higher loss limits) to ensure that the player card and cashless gaming system is robust, simple to use and maximally designed to reduce gambling harms. Anglicare Tasmania's recommendations can be summarised as follows:

1. A mandatory pre-commitment card with several critical features to maximise harm reduction, as set out in Anglicare Tasmania's report, *The poker machine card. Simple as.*²
2. A robust and independent certification process for higher loss limits, to be reviewed after 12 months.
3. Verification of a cardholder's identity at key points, including when changing loss limits.
4. Monthly player activity statements where the player has been active within the statement period, and it should include a summary of the amounts won and lost.
5. A minimum cooling-off period of 24 hours before any increase to loss limits takes effect.

² Anglicare Tasmania (2023), [The poker machine card. Simple as.](#)

Concerns about Implementation Timeframes

TasCOSS has two concerns about the timeframes provided in the Consultation Paper regarding the rollout of the system. Until the rollout of the player card and cashless gaming card system is complete (i.e. when all features of the system are fully functioning, and the card is mandatory in all hotels, clubs and casinos in the state), Tasmanians won't benefit from its promise to reduce harms from EGM play.

Delayed Implementation in Hotels and Clubs

The Tasmanian Government previously committed to implementing the system by the end of 2024, but then extended this timeframe until the end of 2025. TasCOSS notes that the Consultation Paper states that the first phase of the implementation of the system in hotels and clubs is only due to commence in December 2025, and there is no timeframe given for when it is due to be completed.

Lack of Clarity about Timeframes for Implementation in Casinos

TasCOSS also notes that the Consultation Paper states that the 'implementation date' for the rollout of the system in casinos 'has not yet been determined.' EGMs in casinos are a significant contributor to harms from EGM play in this state: in 2022/23, Tasmanians spent over \$75 million on EGM play in casinos.³ It is important that the player card and cashless gaming system is implemented in casinos in line with the timeframe set out for hotels and clubs, in order to avoid a situation in which players simply opt to play on EGMs in casinos to avoid the player card and cashless gaming system in hotels and clubs.

³ [Tasmanian Liquor and Gaming Commission Annual Report 2022/23](#), Table 1.

Recommendations

TasCOSS recommends that the Tasmanian Government:

1. Adopt the recommendations about the critical features of the player card and cashless gaming system made by Anglicare Tasmania in their submission to this consultation.
2. Provide certainty about when the rollout of the system in all hotels and clubs will be completed and expedite the rollout of the system to reduce further EGM-related harm to Tasmanians.
3. Expedite the rollout of the system in casinos so that it occurs in line with the rollout in hotels and clubs in order to achieve statewide coverage.
4. In the absence of a pre-commitment player card, introduce immediate, evidence-based, harm reduction measures, including:
 - \$1 bet limits;
 - Slower spin speeds (six seconds);
 - Prohibiting 'losses disguised as wins';
 - Smaller jackpots;
 - Higher return to player; and
 - Reduced opening hours for poker machine (EGM) venues.