

# SUBMISSION GUIDE: Player Card and Cashless Gaming Public Consultation

Published by Meg Webb MLC

SUBMISSIONS DUE FRIDAY 18 OCTOBER 2024:- *HAVE YOUR SAY!*

## *What is Happening?:*

The Tasmanian Government intends to introduce a Player Card for poker machines. These cards would be mandatory (no use of a poker machine without a card), account-based and cashless (no capacity for putting cash into a machine) and for all poker machines in the State (hotels, clubs and casinos).

The player card is now required to be introduced by December 2025 after the Government agreed to a delay of one year to give the electronic monitoring system operator MaxGaming more time to develop the system. No date has yet been set for the second phase, which is to integrate the Player Card across the casinos.

In September 2024, the Tasmanian Liquor and Gaming Commission (TLGC, or the Commission) released a Public Consultation Paper, which outlines player and operational details that could be included in the system.

### **Submissions are due by Friday 18<sup>th</sup> October.**

Send submissions to:

The Tasmanian Liquor and Gaming Commission

Email: [player.card.gaming@treasury.tas.gov.au](mailto:player.card.gaming@treasury.tas.gov.au)

## *For more information about the Player Card:*

- ▶ [“Tasmanian state election briefing paper: universal poker machine player card”](#), by Meg Webb, February 2024
- ▶ [“Background paper: A Tasmanian universal card-based system for poker machines \(EGMs\)”](#), by Meg Webb, February 2023
- ▶ [“The poker machine card. Simple as.”](#), Anglicare Tasmania



## Background Information:

**December 2021:** [Ministerial Direction by the Minister for Finance \(Michael Ferguson\)](#) to the Commission to investigate the extent to which facial recognition technology and smartcard-based systems for poker machines could minimize harm.

**June 2022:** [“Investigation of harm minimization technologies: facial recognition and player card gaming, Report to Treasurer”](#) by TLGC released. This recommended:

- ▶ Mandatory registered card for all poker machines in Tasmania.
- ▶ One card per person, operated by a PIN.
- ▶ A default daily limit of \$100, monthly limit of \$500 and annual limit of \$5000.
- ▶ Players able to set lower limits, including to zero, taking effect immediately.
- ▶ Players required to prove financial capacity if they request to increase loss limits above the default.
- ▶ Cards will not function once loss limit is reached.
- ▶ Messages about player activity to be provided through the card system.

**September 2022:** [Ministerial Direction by the Treasurer \(Michael Ferguson\)](#) to the TLGC for the Commission to “oversee the development and implementation of a state-wide player card gaming system with precommitment for electronic gaming machines in hotels, clubs and casinos”. The Direction includes the following key points:

- ▶ State-wide player card with pre-commitment in hotels, clubs and casinos with limits as proposed by Commission in June 2022.
- ▶ Simple process to increase loss limits up to a set annual threshold of \$5000 and a comprehensive process to increase loss limits above the threshold, including an annual review.

**December 2023:** The TLGC produces a [“Preliminary Consultation with Industry”](#) paper marked “confidential information for discussion”. This paper provides detail of how the cards could work, including player experience and venue requirements. The options presented for discussion offer good consumer protection. But there are no consultation questions, no due date for feedback and no information as to whether or how this consultation took place.

**September 2024:** The TLGC releases [“Player Card and Cashless Gaming Public Consultation Paper”](#) seeking submissions about the implementation of the system in regards to player experience and operational requirements. This paper refers to the “Industry Consultation Paper” but does not refer to any feedback provided by industry.



The public consultation paper is similar to the industry consultation paper.

### A summary of the card system as proposed by the Tasmanian Liquor and Gaming Commission

- ▶ The player starts the registration process online or at a venue.
- ▶ Player shows a photo ID at venue.
- ▶ ID is checked, including whether on Gambling Exclusion List. No card issued if person is excluded.
- ▶ Venue issues a Player Card – each venue is to have a machine that can print cards.
- ▶ Player creates PIN, selects own limits or agrees to the default limits, loads funds onto the account (via cash or EFTPOS, no credit allowed).
- ▶ Player inserts card into poker machine and enters their PIN.
- ▶ The card is subject to mandatory daily, monthly and annual loss limits as well as a mandatory break in play. Voluntary limits to total time on machine can be set.

### Issues for which the Commission is seeking comments

#### 1. Registration for player cards

Player needs to register online or in venue and provide photo ID in venue. Venue staff sight but do not copy the photo ID. Registration process is to reduce opportunity for money laundering, check if the person is excluded, and ensure people do not obtain duplicate cards.

If the person is a visitor to Tasmania they apply for a card with an expiry date – either the date of departure from the State or a date prior to that. They must show ID that proves they are a non-resident.

#### TLGC questions:

What stage should a person's identity be verified?

#### **Proposed feedback:**

- **Registration process as proposed is good.**
- **ID should be checked at card issue, card reissue, when requesting an increase in loss limits, and when receiving payouts. Rationale: interacting with a human is good practice for minimizing harm.**



## 2. Player activity statements

Activity can be seen via the Player Portal (online) or via a request at a venue. Details have not yet been determined.

### TLGC questions:

Should activity statements be mandatory or optional, how often should they be generated and what information they should contain?

#### **Proposed feedback:**

- **Player activity statements should be mandatory and at the very least issued annually. The statement should contain for that year: the amount lost and the time spent at machines. The statement must not contain any advertising or promotion but must contain approved messages about the harm caused by gambling.**

## 3. Limit setting (pre-commitment) of player cards

Default limits proposed by the Commission are: daily limit of \$100, monthly limit of \$500 and annual limit of \$5000.

Players can request the venue to increase their limits up to daily limit of \$500, monthly limit of \$5000 and annual limit of \$5000. They can request an increase to their limits as often as they like if they remain within the 3 thresholds. Beyond these 3 thresholds, players are required to prove their capacity to spend the nominated amount. TLGC is still looking into an appropriate process for this.

Play is disabled as soon as limit is reached. The venue is alerted (there is no information whether the venue is required to do anything). Card cannot operate a machine until the limit period has expired (e.g. if reached daily limit, can't use machine again until the following day).

Player can decrease limit at any time, including to zero and the change is effective immediately.

### TLGC questions:

Should there be a cooling off period before an increase in a loss limit comes into effect?

What evidence of financial capacity should be provided?

#### **Proposed feedback:**

- **Cooling off periods are good consumer practice. For example, Consumer Affairs Victoria explains the benefits of cooling off periods for situations where a consumer may be likely to make “short-sighted or emotion-based decisions” ([“Cooling-off periods in Victoria: their use, nature, cost and implications”](#), page 12). Further, “Consumers can make poor choices that they later regret when there is a divergence between their short-term and long-term preferences” as a result of “availability bias”, “hyperbolic discounting” (where the consumer is more focussed on short-term gains or losses than the long-term, based often on immediate pleasure overcoming delayed or long-term regret), or “hot states” (decisions made in the heat of the moment) (page 12).**
- **The Commission proposes a 24-hour period. This seems to be sufficient for the player to consider whether their decision was made without proper consideration.**
- **The default and threshold loss limits should be implemented as proposed by the Commission as they were informed by national and international research as well as the 2021 SEIS.**



#### 4. Funds in and out of player cards/accounts and machines

Funds can be loaded into a player's account by cash or EFTPOS. They will be required to swipe their card and enter their PIN. Adding funds from credit cards will not be permitted.

At the start of the session the player transfers funds from their account to the poker machine ("loads the machine").

*TLGC questions:*

Should there be a limit on how much money can be loaded into a player account?

Should there be a limit on transferring from their account to a machine?

Should there be an ID check (as well as PIN) when collecting funds?

What should the maximum be for cash payouts?

##### ***Proposed feedback:***

- **There should be limits on how much money can be loaded into a player account. The maximum allowed into the account should be the maximum annual loss limit set by the player. The default limit for this would be \$5000.**
- **There should be a limit on the amount that can be loaded onto a machine.**
- **When a player collects funds there should be an ID check as well as a check they are not excluded.**

#### 5. Membership and loyalty schemes

The Consultation paper does not explain how venue memberships or loyalty schemes would operate with the Player Card.

*TLGC questions:*

What issues should be considered for membership and loyalty schemes?

##### ***Proposed feedback:***

- **Membership and loyalty schemes are ways for an industry to push consumer spending in a particular way, to benefit the industry. Once details are finalised for the new card-based system, the Commission should review the current [Responsible Gambling Code of Practice](#) to ensure the requirements for membership and loyalty schemes are consistent across all venues (hotels, clubs and casinos) and match the purpose of the card-based system in minimizing harm.**

#### 6. Exclusions

The card system allows a lot of flexibility for the player to force breaks on themselves as well as for the system to exclude them for harmful gambling. However, the details for the system-based exclusions are not yet determined.

##### ***Proposed feedback:***

- **The player card should be linked to system-based exclusions such that the card cannot be used when an exclusion is activated. Exclusions should continue to be activated by self, venue or third party. Players will also be able to use features to force them to have short-term breaks.**

