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The Hon. Jeremy Rockliff MP  
Premier  
Parliament House  
Hobart, TAS, 7000

Via Email: [jeremy.rockliff@dpac.tas.gov.au](mailto:jeremy.rockliff@dpac.tas.gov.au)

CC: Members of the House of Assembly and the Legislative Council

Wednesday, 13 November 2024

Dear Premier,

**Open Letter in Support of the Mandatory Poker Machine Card with Preset Loss Limits**

We are writing to urge you to stay the course on introducing a mandatory poker machine card with preset loss limits as recommended by the independent Gaming Commission, backed by research and championed since 2022 by then Treasurer Michael Ferguson.

This is not a new idea, it is not new technology, it will work to significantly reduce harm to the community, and any credible cost/benefit analysis of its implementation would demonstrate a positive impact on the Tasmanian community and economy.

Tasmania's two casinos already have a mandatory player card for their premium members, which provides real-time monitoring of losses. The casinos are required to intervene when harm is indicated. Details of its effectiveness is not publicly available, but we would urge Members of Parliament to approach the Tasmanian Gaming Commission for a briefing. There is also a card required for all poker machines at Crown Casino in Victoria.

Tasmania's progress on introducing a statewide card-based system for poker machines is nation-leading. It is recognized as a measure that will save lives.

The mandatory card will be effective in reducing harm and preventing addiction and would set a new standard in evidence-based consumer protection.

It is therefore not surprising that the poker machine industry is fighting against the card, just as it fought against proposals for \$1 bet limits, and the earlier iteration of a mandatory pre-commitment card previously recommended by the Productivity Commission after extensive research and consultation and which was progressing nationally under the Gillard Government in 2011.

Given that we have not seen the Terms of Reference, the signatories to this letter are deeply concerned that the recently commissioned Deloitte Access Economics report will be based on inadequate consultation and flawed economic modelling.

The document tabled in the Tasmanian Legislative Council on the 29<sup>th</sup> of October seems to be a work plan provided by Deloitte in response to a still-secret Government Terms of Reference, and appears to assume as the basis for its modelling that people who are dissatisfied with the card-based system will transfer to another gambling activity, one that provides less employment for Tasmanians.

**There is no evidence for such transfer of gambling activity in any of the countries where a limit-setting card has been introduced, nor was there during the pandemic when venues were closed.**

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Extensive consultation, a review of national and international research and an independent feasibility study has already been undertaken by the Tasmanian Gaming Commission and the Liquor and Gaming Branch of Treasury.

Meanwhile, poker machine venues have benefited substantially from recent licensing and regulatory reform. As identified by the former Treasurer Michael Ferguson in his Talking Point published on Friday the 1<sup>st</sup> of November, *“the vast majority of pubs were up [in profits] between 40 and 60 per cent”* as a result of the Future Gaming Market reforms that were introduced in July 2023. *“The highest additional retained revenue was an additional \$73,000 in one month alone, in just one venue”*.

These apparent substantial additional retained profits are what was expected of the reforms, with the Government anticipating in 2022, *“that venues will retain a greater percentage of their turnover under the new FGM arrangements than under the current arrangements even taking into account the costs of the card-based systems”*.

It is these substantial additional profits the poker machine industry is desperately seeking to protect, including through using its influence to secure weighted mechanisms such as the recently revealed Deloitte analysis underway.

**Putting more effective control in the hands of those using poker machines, through a card with set loss limits is demonstrably the most effective consumer protection measure.**

The limit-setting card will reduce harm, which evidence tells us accounts for around half of all poker machine losses. Because the card will work, the profits of poker machine venues will be affected – that is the only meaningful indication that less harm is occurring.

It is a well-known tactic by industry to promote Facial Recognition Technology because, at best, it is marginal as a consumer protection measure and will have little impact on venue profits. FRT can only be relevant in assisting the 344 people on the state’s exclusion register, who are a small subset of Tasmanians currently addicted to poker machines and being harmed.

Premier, as you would be aware, FRT has been rejected by the Gaming Commission as an ineffective option, while the evidence-based, recommended and committed to card-based system will help many thousands of Tasmanians limit their losses, reduce harm and address addiction.

The Gaming Commission and Liquor and Gaming Branch of Treasury have already spent hundreds of hours and likely millions of dollars following the Ministerial Direction to implement the recommended and agreed card-based system. The industry chose not to provide submissions when invited in December 2023 by the Gaming Commission to help formulate the design of the system. When the Commission recently conducted public consultation, the majority of the 25 submissions made were from individuals, service organisations, researchers and politicians who support the introduction of the card.

Every delay in implementing the recommended card means Tasmanians are stuck with inadequate consumer protection. All previous attempts for effective consumer protection have been beaten down by industry: \$1 bet limit, slowing spin speeds, reducing opening hours, a national mandatory pre-commitment card, removing poker machines from hotels and clubs.

Tasmania can show leadership right now by continuing with the implementation of a mandatory poker machine card with preset loss limits, as directed by the Minister in 2022. This would prioritise and protect the health, social and economic wellbeing of all Tasmanians.

**It is no exaggeration, Premier, the limit-setting card as promised by your government will save Tasmanian lives.**

We, the undersigned, call on you to stand up and stand firm with the Tasmanian people.

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**Signed by:**

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**Tim Costello**, Baptist Minister and chief advocate for the Alliance for Gambling Reform; *and*

**Dr James Boyce**, Tasmanian writer and historian

**Sarah Charlton**, Chief Executive Officer, Holyoake

**Rev David Fotheringham**, Moderator, Uniting Church in Australia, Synod of Victoria and Tasmania

**Peter Hoult**, former Chair Tasmanian Gaming Commission 2008-2016

**Chris Jones**, CEO Anglicare Tasmania

**Michael Kelly**, CEO Relationships Australia Tasmania

**Michelle Pearse**, CEO Australian Christian Lobby

**Rohan Pryor**, Chairperson of the Presbytery of Tasmania, Uniting Church in Australia, Synod of Victoria and Tasmania

**Kate Roberts**, Executive Officer Gambling Impact Society NSW

**Jason Saladino**, Chairperson Gambling Impact Society NSW

**Lucinda Szczypior**, Acting Chief Executive Officer TasCOSS