

Tasmanian Liquor and Gaming Commission

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Hon Eric Abetz MP
Treasurer
Level 10, Executive Building
15 Murray Street
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Dear Treasurer

In this communication, the Tasmanian Liquor and Gaming Commission (the Commission) provides formal advice on elements of the Government's harm minimisation package recently announced by you on 23 January 2026. We do this under Section 125 of the *Gaming Control Act 1993* which sets out the functions of the Commission. These include, *inter alia*:

- (ab) to impartially, independently and in the public interest, research, promote, investigate and make recommendations about the impacts of gambling in Tasmania;
- (ac) to foster the responsible service of gambling and minimise the harm from gambling;
- (b) to investigate, and make policy recommendations to the Minister on matters relating to gaming and other forms of wagering.

As you are aware, under Ministerial Direction (No.1) 2022, the Commission developed a player card gaming system with mandatory loss limits for implementation in 2025. It is not the intention here to restate the case for this initiative – repeatedly referred to as the “gold standard” in harm minimisation. You would be aware that the Premier in late 2024 announced that the Government was deferring progress on player card gaming reforms.

The Commission acknowledged this changed position in a meeting with the (then) Treasurer (Hon. Guy Barnett MHA) on 19 December 2024. At that time, the Commission put forward (orally) an option for introducing a registered card (which is currently in use in the State's casinos) where users could set their own loss limits, keep track of their spending and thus make informed decisions about the level of loss they were willing to bear.

In a letter dated 24 January 2025, Minister Barnett formally requested the Commission to put the work on player card gaming reforms on hold and indicated that “work was underway” on a replacement package which might include amongst other things facial recognition technology and reforms to the Tasmanian Gambling Exclusion Scheme. He also advised that the Premier had written to his state and territory counterparts seeking to better understand the work underway in other jurisdictions and to share information with a view of developing national consistency where possible.

Subsequently, the Commission wrote to the Premier in February 2025 outlining the extent of our knowledge of where the other jurisdictions were at with the introduction of gambling reforms which they were all developing to various degrees. We reiterated in that letter our commitment to “working with the Government to implement practical and effective measures to mitigate the harm caused by EGMs”.

The Commission had no further interaction at all with Government on harm minimisation measures until the meeting between the Chair of the Commission and you on 23 January 2026, nearly 12 months later, at which you outlined the package s26 and that you would be announcing that day. For the avoidance of any doubt, the Commission had not been consulted in any way concerning these measures.

Because the Commission was not aware of what was proposed to be contained in the harm minimisation package until then, we have not been in a position to provide any advice to you on the contents. We set this out now in the context of our statutory functions as outlined above.

As an introductory statement, the Commission has no evidence that it can provide to you that any of the initiatives currently proposed in the package will minimise harm. Indeed, we are concerned that many will not deliver protections from gambling harm, but in fact will have the opposite effect, and take Tasmania backwards from where it currently is.

The introduction of ATMs with facial recognition in hotels and clubs

The Commission is greatly concerned about the introduction of ATMs in hotels and clubs in Tasmania. We see this initiative as potentially creating greater harm rather than minimising or preventing it.

It is well documented that access to cash is a strong determinant in facilitating gaming in licensed venues. This was acknowledged as far back as 1999 in the *Productivity Commission's* report on Australia's gambling industries¹. Ready availability to additional cash beyond what is brought into a venue allows for an immediate response to chasing losses on EGMs and is why this is seen as such a harmful initiative.

Currently, the Commission allows a maximum withdrawal of \$200 in one EFTPOS transaction per day. The introduction of ATMs with \$400 limits in venues will triple the cash available to players. Plainly, to limit the obvious risk of damage from this new measure, at least the availability of withdrawal through EFTPOS transactions should be removed.

The Commission is not aware of the availability of facial recognition ATMs for general public use in Australia. Neither is it aware of any evidence of its operation or effectiveness from a harm minimisation perspective.

Ticket In Ticket Out system for EGMs (TITO)

The Commission has not considered the technicalities of this system because Treasury officers have been unable, as yet, to provide complete briefings regarding this. As proposed, it will replace the current, admittedly cumbersome, coin-based system and make it far easier and quicker to feed an equivalent amount (and indeed an even greater amount) of money into an electronic gaming machine using a ticket rather than coin. But

¹ Productivity Commission 1999. Australia's Gambling Industries

there is no evidence to indicate that ease and speed will, or is even likely to, result in protection from harm. Notably, there is strong evidence to suggest that “tap and go” and TITO systems can result in an increased “spending effect” of up to 20%.²

The Commission is also concerned about the clear increased risk of money laundering in Tasmania with this previously unseen cash availability (enhanced by the presence of ATMs) in hotels and clubs. AUSTRAC has identified this sector as highly vulnerable to money laundering with EGMs considered to present one of the higher risk gambling services available due to the scale of funds that can be moved.³ The Commission is very concerned that at present licensed venues in Tasmania (apart from the casinos) may not be fully implementing an AML/CTF Program and risk assessment supported with training and support for staff. That concern is increased by this measure.

Facial Recognition Technology (FRT)

The Commission’s views on FRT are already well known and canvassed initially in our 2022 Report⁴ to the (then) Treasurer (Hon. Michael Ferguson MHA). It is important to recognise that FRT can be an effective tool in minimising harm but its effectiveness only relates to the small number of persons already excluded from gaming.⁵ Only a fraction of these individuals would attempt to subvert their own or venue-imposed exclusion orders. Further, it is only effective if appropriate action is taken by a venue operator immediately that an identification is made. The Commission sees FRT as, at best, an additional tool to mitigate already existing harm.

It is acknowledged that FRT is a tool that can assist venues to manage their regulatory responsibilities regarding identifying excluded persons provided venues manage the technology and train staff appropriately.

Extension of mandatory closure period for venues from four hours to seven hours

Any reduction in the hours in which gaming is operated has the potential for minimising harm from problem gambling, but it is likely that very few venues – and therefore players – would be impacted by this initiative. This is because most venues currently do not seek to open for the maximum time allowed and the consequence will therefore have low impact. In discussions with Hospitality Tasmania⁶, this did not seem to be an initiative that would widely bring change to many venues.

In any case, it is highly likely that the number of players taking advantage of current extended opening hours would be small. However, given the time of early morning visitation, the Commission believes many of these persons could be those experiencing harm from gambling. Arguably, for such persons, shorter hours of operation would be a good thing.

The Commission does not have any baseline data nor evidence about the extent or efficacy of opening hours behaviour in Tasmania. It would be important that the closure hours are consistently applied, so that all venues are closed at the same time, so there cannot be a rolling set of opening hours particularly in venues in close proximity to each

² Victorian Responsible Gambling Foundation July 2020. *What is the impact of cashless gaming on gambling and harm*

³ AUSTRAC August 2024. *AUSTRAC National risk Assessments on Money Laundering and Terrorism Financing – important insights for the gambling sector*

⁴ Tasmanian Liquor and Gaming Commission June 2022. *Investigation of harm minimisation technologies: facial recognition and player card gaming*

⁵ As at February 2026: 306 self-exclusions and 133 venue exclusions

⁶ TLGC Stakeholder meeting 2 March 2026

other. The Commission has evidence of players, including those self excluded, moving from one venue to the next in the small hours of the day, a practice exacerbating harm to problem gamblers.

Reduction in EGM cap

The Commission sees no detriment in this initiative but notes that historically the current EGM cap for venues has not been met. This initiative will allow for a natural reduction in the cap over time.

The Commission does not see this initiative having any impact on levels of gambling and it is not seen as a harm minimisation measure.

Reform of the Tasmanian Gambling Exclusion Scheme database

This initiative is welcomed by the Commission but of itself is likely to do little to address harm minimisation.

The Commission is very supportive of a technology reform that will allow individuals to self-exclude in venues in a timely manner without the need for a counsellor appointment and time delays in achieving the desired end. This technology has been available in on-line gambling sites for some time and is successful in assisting individuals to manage their behaviours at a time of immediate stress.

Gaming Care Officers

The Commission has already put on the record in a letter to you (12 December 2025) its concerns about the proposed gaming care officer model.

Conclusion

As the independent statutory body charged under legislation with fostering the responsible service of gambling and minimising the harm from gambling, the Commission appreciates the opportunity to provide this advice to you.

The Commission affirms its commitment to continuing to regulate gaming in this State according to its enabling legislation and to follow the lawful directions of Government.

Jenny Cranston

Andrew Walker

David Hudson

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Tasmanian Liquor and Gaming Commission

31 March 2026



Tasmanian
Government

Treasurer
Minister for Macquarie Point Urban Renewal
Leader of the House

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Tasmanian Liquor and Gaming Commission

Via email:

s36

17 APR 2026

Dear Commissioners,

Thank you for your letter of 31 March 2026 and for subsequently taking the time to meet with me to discuss the Government's approach to gaming harm minimisation in Tasmania. I appreciate the time taken to set out your views.

The suite of measures recently announced by the Government will deliver immediate and practical harm reduction outcomes, while balancing effective consumer protections with proportional regulation, operational practicality, and respect for personal agency. It is critical to look at the package as a whole, with each measure reinforcing the others, rather than as isolated initiatives. In that context, I will provide further information on each measure as follows to assist you in implementation of the suite of measures.

Mandatory closure period for gaming rooms

The Commission notes that extending the mandatory closure period from four hours to seven hours is likely to have limited impact, on the basis that many venues do not currently operate to maximum permitted hours. The Government does not share this assessment.

This reform materially reduces overall gaming availability and removes opportunities for play, particularly during the early morning period, which evidence consistently associates with higher levels of gambling harm. While it may be true that only a subset of venues currently operate extended hours, the impact is a practical reduction in the availability of EGMs.

Allowing venues to determine their own seven-hour closure period avoids unnecessary prescription, recognises operational differences between venues, and enables closures to be integrated into broader business operations without regulatory complexity. In practice, history has shown that venues have adopted a standard convention on the forced closure period.

Ticket In Ticket Out (TITO)

The Commission raises concerns that TITO may increase spending and harm, and notes the lack of direct evidence supporting harm reduction benefits.

The introduction of TITO modernises Tasmania's gaming environment and aligns it with every other Australian jurisdiction. Tasmania remains the only state where gaming in hotels and clubs operates on a coin-only basis, despite fundamental changes in how physical cash is used within the broader economy. While I acknowledge your reference to the 1999 Productivity Commission report, the role of physical currency in everyday life has changed.

Importantly, the Tasmanian TITO model will be accompanied by significantly lower machine load limits. A machine will only be able to accept a maximum of \$100 at any one time, compared to the current \$500 limit. These constraints introduce forced breaks in play that are not present under the existing coin-based system and materially constrain continuous gambling behaviour. This is also a very low limit compared to other jurisdictions.

TITO does not increase a player's total available funds, nor does it introduce access to credit. Rather, it removes the ability to continuously load machines using large quantities of coins and enables modern system controls. Implementation requirements and operational controls will be determined under the Commission's authority, consistent with its statutory function to foster responsible gambling behaviour, and I look forward to discussing the introduction of TITO with you further.

Facial recognition technology and exclusion

The Commission correctly observes that facial recognition technology is most effective in identifying excluded persons. This is the purpose for which the Government is mandating its use.

Under the suite of measures to be implemented, the Government's vision is that facial recognition technology will be mandatory at venue entry points and connected in real-time to the Tasmanian Gambling Exclusion Scheme (TGES). This will enable immediate and reliable identification of excluded patrons and remove the current reliance on subjective judgement by venue staff and dated photographic material.

A critical element to improve the operation of the TGES is to also introduce immediate self-exclusion within venues, allowing individuals to initiate exclusion at the point of decision. The Government considers immediacy critical to effectiveness, as the motivation to self-exclude is often strongest at the moment harm is recognised.

Caps on electronic gaming machine numbers

The Commission suggests that this reform will not function as a harm minimisation measure while noting the cap has not been met historically.

The Government's reform fixes the cap on machine numbers at actual utilisation as at 30 June 2026 and provides for reductions over time through natural attrition. This approach prevents future expansion, provides certainty, and ensures reductions occur in an orderly and predictable manner without destabilising the viability of regional and community venues.

Access to cash in venues

The Commission expresses concern regarding permitting ATM access, noting the increased availability of cash.

The existing EFTPOS withdrawal limit of \$200 was introduced in 2012. Had this limit been indexed to inflation, it would now be materially higher. Under the Government's policy, cash withdrawals will be capped at \$400 per person per day, withdrawals continue to be limited to debit cards only and gambling on credit will remain prohibited.

Facial recognition technology will enable these limits to be enforced consistently and accurately, replacing the current paper-based register system. This represents a significant improvement in compliance, oversight, and enforceability, including preventing circumvention of daily limits across venues.

It is critical that this technology is reliably implemented in venues. I am considering the planned Ministerial Direction to the Commission to specify that venues can have ATMs or EFTPOS, rather than both, which I believe will help ensure reliability of relevant systems.

Gaming Care Officers

I acknowledge the Commission's view that delivering the services through not-for-profit organisations that provide gambling support services is preferable and I am pleased to provide further information to you to address points raised.

While noting the points of the Commission, the Government's view is that the role of Gaming Care Officers is educative and supportive, working alongside venue staff to identify indicators of harm, strengthen referral pathways, and support early intervention, rather than to provide the gambling support services themselves.

Embedding the Gaming Care Officers with Hospitality Tasmania as the peak body for the industry will provide a highly practical option, particularly by leveraging existing communication pathways and the organisation's credibility within industry to provide trusted advice. Delivering this function through industry, governed by a funding deed, avoids potential conflicts between regulation and support services and complements broader operational reforms arising from new technologies.

This arrangement will clearly define Gaming Care Officers as facilitators of best practice, with no expectation that they provide gambling support services or perform any regulatory or enforcement function on behalf of the Commission or Treasury.

Relationship to player card reforms

The Government acknowledges the Commission's previous work on mandatory player card systems and the findings of the Deloitte Access Economics report. However, it is appropriate to pause implementation of a mandatory player card pending further evidence from other jurisdictions.

The Government continues to actively monitor interstate experience and remains open to future reform. In the interim, the current package delivers tangible short-term improvements

in consumer protection through immediate self-exclusion, enhanced enforcement of cash limits, reduced operating hours, and modernised system controls.

In closing, the Government recognises the Commission's statutory responsibilities and values its ongoing role as regulator. The reforms announced should be understood as a balanced and practical package designed to reduce harm in the short term, while allowing for future reform informed by evidence and national experience.

I look forward to continued engagement with the Commission as these measures are implemented.

Thank you again for taking the time to write and for your continued contribution to this important policy discussion.

Yours sincerely



Hon Eric Abetz MP
Treasurer

Tasmanian Liquor and Gaming Commission

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Hon Eric Abetz MP
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Sent by email: Minister.Abetz@dpac.tas.gov.au

Dear Treasurer

Draft Ministerial Direction – Gambling Harm Minimisation Package

Thank you for the opportunity for the Commission to provide comment on the draft Ministerial Direction on the Government's harm minimisation package at our meeting with you on 2 April 2026. We provided extensive comment on these measures in our correspondence of 31 March 2026 and will not re-state this here.

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Meaningful breaks in play are a recognised harm minimisation measure to allow players to "get out of the zone", reflect on their behaviour and to slow down the level of loss. The Commission's view - and one widely supported by all relevant research and anti-gambling experts in Australia and globally¹ - is that a break in play, at the very least, means a step away from the seat for some amount of time, ideally to interact with staff or other persons.

¹Gainsbury, S. & Blaszczynski, A. (2016). Breaks in play: Empowering gamblers through in-game harm minimisation features for electronic gaming machines. Zeitschrift für Glücksspielwesen.

Geo Evidence Centre & International Association of Gaming Regulators (2022). Forced breaks to reduce the harms of continuous gambling.

For this reason, the Commission has long prohibited the serving of food or alcohol at the EGMs so that players can break play while they take refreshments.

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Finally, there is a significantly heightened risk of money laundering with note acceptors.²

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We remain committed to adhering to our legislative responsibilities outlined as above but also adhering to the Object of the *Gaming Control Act 1993* (section 2A) namely:

- (a) to ensure gambling is conducted in a fair, honest and transparent way and is free from criminal behaviour influence; and
- (b) to take a public health and consumer protection approach to protect people, particularly people who are vulnerable, from being –
 - i. harmed by gambling; or
 - ii. exploited by gaming operators.

A robust regulatory framework should aim to get the balance right between the facilitation of a legitimate activity that many people enjoy recreationally but is carried on in a manner that provides protections where appropriate.

The Commission hopes that our concerns will be considered along with an evidence base to support our views which we could provide should you wish. Additionally, Treasury officers would be able to provide this if requested.

s36

Jenny Cranston, Chair

Andrew Walker, Member

David Hudson, Member

Tasmanian Liquor and Gaming Commission

Parke, A. et al. (2019). *Effect of within-session breaks in play on gambling behaviour during sustained losses*. Current Psychology.

²International Compliance Association (ICA). Money laundering risks in betting and gaming.

RapidAML / AMLTRIX. Money-laundering typologies relating to TITO tickets.

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