

Submission from Anglicare Tasmania to Legislative Council Sessional Committee Government Administration A Subcommittee

Inquiry into Recent Developments Relating to Government Policy on Poker Machine Harm Minimisation



WORKING FOR
A JUST TASMANIA

Contents

About Anglicare Tasmania	3
Introduction.....	4
Anglicare Tasmania’s experience and contribution to evidence-based EGM harm minimisation policy	5
Gaming Care Officers.....	7
Anglicare Tasmania’s position on EGM harm minimisation is supported by the findings of the Deloitte report	8
Public statements.....	9
Conclusion	10

Anglicare Tasmania acknowledges the Tasmanian Aboriginal community as the traditional and original owners and continuing custodians of this land lutruwita. We pay respect to Elders past and present.

About Anglicare Tasmania

Anglicare Tasmania is a large community service organisation in Tasmania with offices in Hobart, Glenorchy, Launceston, St Helens, Devonport, Burnie, Sorell and Zeehan and a range of programs in rural areas. Anglicare Tasmania's services include: Housing Connect, crisis, short-term and long-term accommodation support; mental health support services; support services following a motor vehicle accident; aged and home care services; alcohol and other drug services; financial and gambling counselling; and family support. In addition, Anglicare Tasmania's Social Action and Research Centre conducts research, policy and advocacy work with a focus on issues affecting Tasmanians on low incomes.

Anglicare Tasmania's mission sees us strive to achieve social justice. We report on the effects of poverty and disadvantage in our State and provide decision-makers with policy responses to help build a more just society. We provide opportunities for people in need to reach their full potential through our services, research and advocacy.

Anglicare Tasmania's work is guided by a set of values which includes these beliefs:

- that each person is valuable and deserves to be treated with respect and dignity;
- that each person has the capacity to make and to bear the responsibility for choices and decisions about their life;
- that support should be available to all who need it; and
- that every person can live life abundantly.

For further information about this submission please contact:

Rev. Dr Chris Jones
CEO Anglicare Tasmania
GPO Box 1620
HOBART TAS 7001

Phone: (03) 6213 3562

Email: [REDACTED]

Website: www.anglicare-tas.org.au

Introduction

Anglicare Tasmania welcomes the opportunity to make a submission to the *Short Inquiry into Recent Developments Relating to Government Policy on Poker Machine Harm Minimisation*.

Anglicare Tasmania has been a strong advocate for meaningful harm minimisation policy for Electronic Gaming Machines (EGMs) in Tasmania and has consistently maintained that the most effective form of harm reduction for EGM use is a mandatory pre-commitment card. Reducing gambling harm has the potential to positively impact complex issues like domestic and family violence, poor mental health, poverty and persistent disadvantage.

Following the announcement of the mandatory pre-commitment card by the Tasmanian Government in 2022,¹ Anglicare Tasmania conducted research about the key features needed for the card to be effective. It found that a binding, universal system would reduce gambling harm and deliver the most effective harm minimisation.² Anglicare continued to support the implementation of the card and publicly communicated disappointment about the delay of the card in July 2024,³ and its indefinite deferral in January 2026.⁴

A mandatory pre-commitment card is an evidence-based policy measure that would reduce gambling harm from EGMs, and is supported by Anglicare Tasmania's research and the Deloitte Access Economics report titled *Social and Economic Impact of Electronic Gaming Machine (EGM) Reform use in Tasmania* ('the Deloitte report'). In comparison, the measures announced by the Tasmanian Government as an alternative to the precommitment card⁵ will fail to meaningfully reduce harm.

Further details of Anglicare Tasmania's experience, the evidence we have made available to Government, and public statements, are below.

¹ Ferguson M (2022) [Tasmanian Liquor and Gaming Commission Ministerial Direction \(No. 1\) 2022](#), Tasmanian Government Gazette, No. 22 235, 21 September.

² Bennett M (2023) [The poker machine card: Simple as](#), Social Action and Research Centre, Anglicare Tasmania.

³ Anglicare Tasmania (2024) [From gold standard to second-best](#) [media release], Anglicare Tasmania, 19 November.

⁴ Anglicare Tasmania (2026) [Ignoring the evidence: an opinion piece by Chris Jones](#) [opinion piece], Anglicare Tasmania, 29 January.

⁵ Abetz A (2026) [New EGM harm minimisation measures implemented in Tasmania](#) [media release], Tasmanian Government, 23 January.

Anglicare submission to *Short Inquiry into Recent Developments Relating to Government Policy on Poker Machine Harm Minimisation* |

Anglicare Tasmania's experience and contribution to evidence-based EGM harm minimisation policy

Anglicare Tasmania delivers Gamblers Help and Financial Counselling services statewide, funded by the Tasmanian and Australian Governments. Gamblers Help provides gambling counselling and assistance with self-exclusions. Financial Counselling – Gambling provides information and support to people experiencing the financial impacts of gambling including debt.

In 2025-26 Gamblers Help provided support to 419 people, and Financial Counsellors provided gambling-related support to 30 people.

Anglicare's Social Action and Research Centre also conduct research on issues affecting Tasmanians, and advocates for effective gambling harm minimisation.

In 2022, Anglicare published the research report [*What's the real cost?*](#) which explored the costs of gambling harm in Tasmania, using client stories and data from Anglicare's counselling services.⁶ It highlighted the impacts on individuals, family members and the wider Tasmanian community, including negative health, financial and relationship effects.

In September 2023, Anglicare released [*The poker machine card. Simple as.*](#) which opened as follows:

The Tasmanian Government's commitment to introduce a universal player card gambling system for poker machines by December 2024 is positive action that will reduce harm with minimal impact on people who engage in recreational gambling.

*It's good policy. It's a good idea. It's simple as.*⁷

The report described the relief that many clients of Anglicare Tasmania's Gamblers Help service had felt when they heard that the pre-commitment card would be introduced. *Simple as* highlighted that over 57,000 Tasmanians are harmed by someone else's gambling. It also noted the benefits the card system would have for venue staff (including assisting them to meet their duty of care to prevent money laundering), and the positive impacts for businesses and the Tasmanian economy as a whole.

The *Simple as* report described four critical features that any card system would require to effectively prevent and reduce gambling harm:

- A binding pre-commitment with default loss limits
- Applies to all gamblers
- A single system across all venues
- A single card per person⁸

The evidence shows that partial measures (e.g. a card that is only used in some venues or only by some gamblers) are less effective in reducing harm. They are also more complicated for gamblers to navigate.

On 19 November 2024, the Tasmanian Government announced that "a range of harm minimisation

⁶ Bennett M (2022) [*What's the real cost?*](#), Social Action and Research Centre, Anglicare Tasmania.

⁷ Bennett M (2023), p.4.

⁸ Bennett M (2023), p.8.

measures will be progressed to reduce the harm associated with EGMs while the Government defers progress on a mandatory pre-commitment card”.⁹

In response, Anglicare published a policy brief outlining the evidence in relation to a range of measures aimed at reducing harm from EGMs.¹⁰ The brief reiterated that a mandatory pre-commitment card with default loss limits was the option which would best meet the policy objectives. It would do so by providing protections to 100% of EGM users and reducing gambling-related harm by an estimated 40-60%.¹¹

In contrast, it found that facial recognition technology could not meet the policy objectives, providing protection to only 0.7% of EGM users and reducing gambling harm by less than 3.5%.¹²

The effectiveness of other options was analysed:¹³

Measure	How it reduces harm	Comment	Harm reduction
Mandatory limit-setting	Enables player to spend what they intended	Delivered by card and not feasible without card	Good
Default loss limits	Ensures player has financial capacity to participate	Delivered by card and not feasible without card	Excellent
Interventions based on tracking	• Enables active identification and intervention • Actively supports players to address ‘at risk’ and gambling harm where relevant	Delivered by card and not feasible without card	Good
Pop-ups or other interactive warnings	Provides information to make an informed choice about participation	Delivered by card, can be partially implemented without card	Moderate
Personalised information about time and money spent	Provides information to make an informed choice about participation	Delivered by card, can be partially implemented without card	Moderate

⁹ Barnett G, Jaensch R and Howlett J (2024) [Government progressing with election commitment to harm minimisation](#) [media release], Tasmanian Government, 19 November.

¹⁰ Bennett M (2024) [Policy Brief: Reducing harm from Electronic Gaming Machines in Tasmania](#), Social Action and Research Centre, Anglicare Tasmania, Hobart.

¹¹ Bennett M (2024), p.7.

¹² Bennett M (2024), p.8.

¹³ Bennett M (2024), p.10.

Situating venues away from at-risk populations	Reduces availability and accessibility of EGMs	Would require removal of EGMs from venues	Excellent
Limiting speed and intensity of EGMs	Modifies EGM features linked to gambling harm	Software change easily implemented	Moderate
Limiting bet sizes	Modifies EGM features linked to gambling harm	Software change easily implemented	Moderate

Overall, the policy brief stated that (except for removing EGMs from hotels and clubs) none of the other options substantially met the policy objectives. Also, none were as targeted as the mandatory pre-commitment card.¹⁴

In June 2026, the Tasmanian Government released Ministerial Direction No 1 of 2026 to the Tasmanian Liquor and Gaming Commission (TLGC) outlining its proposed ‘harm minimisation’ measures.¹⁵ One measure was to increase the mandatory closure period for venues with gaming areas from 4 hours to 7 hours per 24 hour period.

Anglicare Tasmania was consulted by the TLGC in relation to the measures and recommended implementation of a prescribed or uniform timeframe for the closure period to apply to all hotels and clubs operating gaming machines. This would prevent venues ‘staggering’ their closure periods and enabling patrons to travel from one venue after its gaming area closes to another that is open. The TLGC incorporated this feedback into the measures.¹⁶

On the 29th of July 2026, the Treasurer issued a direction that the Commission could not specify the start time of the closure period.¹⁷ Anglicare Tasmania expressed concern at this further step away from meaningful harm reduction.¹⁸

Gaming Care Officers

Anglicare is supportive of Gaming Care Officers in principle. However, our view is that Officers should be employed by an entity fully independent of commercial gambling interests. We recommend a model in which Officers are employed by NGOs or health providers.

¹⁴ Bennett M (2024), p.11.

¹⁵ Abetz E (2026) [Tasmanian Liquor and Gaming Commission Ministerial Direction \(No.1\) 2026](#), Tasmanian Government Gazette, No. 22 584, 24 June.

¹⁶ Tasmanian Liquor and Gaming Commission (2026) [Rules](#), 1 August.

¹⁷ Abetz E (2026) [Tasmanian Liquor and Gaming Commission Ministerial Direction \(No. 2\) 2026](#), Tasmanian Government Gazette, No. 22 596, 29 July.

¹⁸ Jones C (2026) ‘Tasmanians let down on gambling laws’, *The Mercury*, 10 August, p. 17.

Anglicare submission to *Short Inquiry into Recent Developments Relating to Government Policy on Poker Machine Harm Minimisation* |

Anglicare Tasmania's position on EGM harm minimisation is supported by the findings of the Deloitte report

Anglicare's research and the Deloitte report state that the benefits of implementing a mandatory pre-commitment card would extend across the state, resulting in a net increase in jobs, a reduction in government expenditure and, most importantly, effective minimisation of harm to Tasmanians.

The Deloitte report released by the Tasmanian Government in January 2026 confirmed what Anglicare had identified in relation to the pre-commitment card:

The social outcomes of the reform are anticipated to be largely positive... a meaningful reduction in gambling-related harm is expected, particularly among problem gamblers, moderate-risk gamblers, and their communities. This reduction is then expected to lead to decreased demand for public health and social support services, decreased costs for justice and policing, improved productivity, and overall improvements in community wellbeing.¹⁹

Anglicare's research has found that virtually all reduction in revenue due to the implementation of the card would be matched by a reduction in gambling harm of an equivalent or greater value.²⁰ This aligns with the findings of the Deloitte report that even in the most conservative scenario the proposed reform would result in additional Gross State Product of \$153 million and 126 additional jobs.²¹

Anglicare's findings in relation to the harm from gambling are echoed in section 4.2 of the Deloitte report, which modelled the impact of the reforms, including costs to government across the domains of health and wellbeing, economic and financial (broader revenue/economy impacts), employment and education, recreation and tourism, and legal and justice.²²

The Deloitte report accounted for the costs to business of absenteeism, crime and lost productivity due to gambling harm, and noted the benefits of increased household disposable income.²³

As described in the Deloitte report, the introduction of cashless gaming without pre-commitment limits is known to increase losses by reducing gaming friction.²⁴

The proposed 'ticket in ticket out' solution is a partial measure which will run in parallel to ongoing cash usage (including higher withdrawal limits from ATMs in venues under certain circumstances).²⁵ Most crucially, it would not create statewide coverage as a basis for a default per-person loss limit. Given this, the 'ticket in ticket-out' system bears no resemblance to the mandatory pre-commitment

¹⁹ Deloitte Access Economics (2025) *Social and Economic Impact of Electronic Gaming Machine (EGM) Reform use in Tasmania*, report for Department of State Growth, p. 7.

²⁰ Bennett M (2024) [Policy Brief: Reducing harm from Electronic Gaming Machines in Tasmania](#), p.7.

²¹ Deloitte Access Economics (2025), p. 7.

²² Deloitte Access Economics (2025), pp. 37 ff.

²³ Deloitte Access Economics (2025), p. 6.

²⁴ Deloitte Access Economics (2025), pp.27-28.

²⁵ Abetz E (2026), 29 July.

card. As the Deloitte report states, “Moving from a cash- to card-based EGM ecosystem is, in the absence of harm minimisation features, likely to increase player losses, particularly for those at moderate to high risk of problem gambling.”²⁶

In contrast, the mandatory pre-commitment card with default loss limits, announced by the State Government in 2022 and supported by both the Deloitte report and Anglicare’s research, would have offset this risk and delivered a targeted approach to preventing harm to Tasmanians.²⁷

Public statements

Since the announcement of the mandatory pre-commitment card in 2022, Anglicare has published the following statements on its website:

- [Mandatory pre-commitment welcomed](#) (15 September 2022)
- [The real cost of gambling harm](#) (31 October 2022)
- [Card-based gaming system will save lives, money and families](#) (22 December 2022)
- [Gambling harm reduction measures welcome](#) (20 July 2023)
- [Card system to benefit all Tasmanians](#) (22 September 2023)
- [Poker machine reforms will protect Tasmanians’ mental health and save lives](#) (5 March 2024)
- [Poker machine card system will reduce financial pressures for families](#) (4 June 2024)
- [Universal poker machine card will help Tasmanians to balance their budgets](#) (20 June 2024)
- [Delay in the introduction of the universal poker machine card ‘disappointing’, says Anglicare](#) (3 July 2024)
- [Research shows pre-commitment technology works](#) (23 July 2024)
- [Poker machine card will prevent crime](#) (23 September 2024)
- [Anglicare supports call by Alliance for Gambling Reform](#) (12 November 2024) (with [open letter](#) to the Premier, signed by CEO Chris Jones and other Alliance members)
- [From gold standard to second-best](#) (19 November 2024)
- [Facial Recognition Technology an ineffective policy response](#) (5 December 2024)
- [Anglicare Tasmania’s response to the Tasmanian Government’s announcement on gambling harm reduction](#) (23 January 2026)
- [Government’s gambling harm measures will fall short](#) (29 June 2026)
- [Standard closure hours would have minimised gambling harm: Chris Jones](#) (12 August 2026)

²⁶ Deloitte Access Economics (2025), p. 6.

²⁷ Deloitte Access Economics (2025), p. 29.

Conclusion

Anglicare Tasmania has consistently maintained that the most effective form of harm reduction for EGM use is a mandatory pre-commitment card, as announced by the Tasmanian Government in 2022. The measures put forward as an alternative to this policy will fall far short of delivering meaningful harm minimisation. The expenditure of public funds on alternative, less effective measures require justification by the Tasmanian Government.