

Poker machine harm minimisation in Tasmania

The case for reinstating mandatory pre-commitment

To: The Secretary, Government Administration Committee A – Sub-Committee
Legislative Council, Parliament of Tasmania
Parliament House, Hobart TAS 7000
By email: [REDACTED]

30 September 2026

Dear Committee Members,

The Alliance for Gambling Reform (AGR) thanks you for the opportunity to provide our views on the Tasmanian Government's poker machine harm minimisation measures, as examined by the Sub-Committee's inquiry into the Government's decision to abandon its mandatory pre-commitment card

By way of background, AGR is a national advocacy organisation working to reduce gambling harm in Australia. We partner with other organisations and with local councils to reduce the alarming level of gambling harm in Australia, we work to change the laws and rules governing the gambling industry. We do not seek to ban gambling. Rather we seek to influence government to minimise the harmful behaviors of the gambling industry and to give voice to those who are impacted by gambling harm.

AGR shares the Committee's strong commitment to ensuring that Tasmania's approach to poker machine harm is grounded in evidence and serves the public interest. We support the Government's introduction of instant QR-code self-exclusion.

In this submission, we measure the Government's approach against the benchmark of mandatory pre-commitment and highlight the absence of any evidence supporting the approach. The package runs contrary to the findings of the Government's own commissioned Deloitte report, *Social and Economic Impact of Electronic Gaming Machine (EGM) Reform use in Tasmania*,¹ and was adopted without the advice of the independent regulator. We also explore why facial recognition, on-site ATMs and the proposed 'Ticket In-Ticket Out' system will not reduce harm and may even increase it; why gaming room closures must be standardised; and why Gaming Officers must be independent of the industry.

We thank you for your consideration of the matters raised in this submission. Should you have any questions, please do not hesitate to contact me or my colleague Mark Kempster via mark.kempster@agr.org.au, who would also welcome the opportunity to appear before the Sub-Committee to represent AGR's views on this important reform.

Best regards,

Sunita Bose
Chief Executive Officer

¹ Deloitte Access Economics, *Social and Economic Impact of Electronic Gaming Machine (EGM) Reform use in Tasmania*, report to the Department of State Growth, December 2025 (published 23 January 2026), available at https://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0020/618023/Deloitte_Electronic-Gaming-Machine-use-in-Tasmania_Dec-2025.PDF.



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1. Context and the benchmark for reform

Summary of recommendations in this section

- A. Reinstate a mandatory, account-based pre-commitment card with binding loss limits as the cornerstone of Tasmania's poker machine harm minimisation framework.

The decision under examination

- 1.1 In January 2026, the Tasmanian Government abandoned its commitment to a mandatory pre-commitment card and replaced it with a package of measures that we consider to be favored by, the gambling industry. This change came in the same year that Tasmanians lost \$193.9 million on poker machines in pubs and clubs, a decade-high figure.²
- 1.2 As set out in the next section, the decision ran directly against the findings of the Government's own commissioned analysis by Deloitte Access Economics, *Social and Economic Impact of Electronic Gaming Machine (EGM) Reform use in Tasmania*³, was made without advice from the independent regulator, and has not been supported by any published evidence that the replacement measures will reduce harm.
- 1.3 The Government has said it will not proceed with a card until there is a national approach. However, a national approach is not a barrier to strong state-level action. For example, the ACT Government has announced a mandatory account-based cashless gaming card with loss limits, demonstrating that a jurisdiction can act without waiting for a national scheme.⁴

Mandatory pre-commitment: the benchmark

- 1.4 Mandatory pre-commitment allows every player to set a limit on how much they can lose before they start playing, and makes that limit binding. It works *before* harm occurs, for every player, rather than after someone has already lost more than they can afford. It is the only measure in this debate that addresses harm at the population level, including among people who do not yet recognise they are at risk.
- 1.5 Each of the measures discussed in this submission should be assessed against this benchmark. The question for the Sub-Committee is not whether a measure could help at the margins, but whether it offers anything close to the protection that the original policy of a mandatory pre-commitment card would have provided. In AGR's view none of the replacement measures, individually or together, meets that test.

² Legislative Council (Tasmania), Notice of Motion, Session 2026, 17 March 2026 (Ms Webb MLC), citing Tasmanians' poker machine losses for 2024-25 of \$193,908,165 and listing the measures announced on 23 January 2026.

³ Deloitte Access Economics, *Social and Economic Impact of Electronic Gaming Machine (EGM) Reform use in Tasmania*, report to the Department of State Growth, December 2025 (published 23 January 2026), available at https://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0020/618023/Deloitte_Electronic-Gaming-Machine-use-in-Tasmania_Dec-2025.PDF.

⁴ Vica Bayley MP, media release, 17 September 2026, reporting the Tasmanian Liquor and Gaming Commission's assessment of the new measures and the ACT Government's announcement of a mandatory account-based cashless gaming card with loss limits.

2. The evidence the Government set aside

Summary of recommendations in this section

- B. The Government publish any modelling, evidence or advice it relied on in adopting the replacement measures, together with a list of the stakeholders it consulted.
- C. The Government seek, and publish, the Liquor and Gaming Commission's advice before making any further change to poker machine harm minimisation policy, and refrain from using Ministerial Directions to override the Commission's evidence-based rules.

What the Government's own report found

- 2.1 The Government engaged Deloitte Access Economics in 2024 to assess the economic and social impacts of the mandatory pre-commitment card. It received the final report in December 2025, after working with Deloitte on two earlier drafts. The report was published on 23 January 2026, the same day the Government announced the replacement package.⁵
- 2.2 Deloitte estimated that the card would reduce gambling expenditure by between 23 and 46 per cent across its three modelled scenarios. It found that the card's harm minimisation features, especially the mandatory loss limits, had the largest effect, and that most of the benefit would flow to people at moderate to high risk of harm.⁶
- 2.3 The economic findings were equally clear. In every scenario the card would lift Tasmania's Gross State Product and net employment, by between \$153 million and \$240 million and between 126 and 238 jobs, with around \$230 million and 209 jobs in the central scenario. Every local government area would see a neutral or positive economic impact. The report also estimated annual savings to government of between \$4.2 million and \$11 million in health, mental health, homelessness, policing, court and corrections costs.⁷
- 2.4 Deloitte also noted that the evidence does not support voluntary pre-commitment as an effective way of reducing losses across the population, because few people choose to set limits, and that the evidence for mandatory pre-commitment is stronger.⁸

The package keeps what Deloitte warned against

- 2.5 One of Deloitte's central findings concerns the risks of making gambling easier. It found that removing the barriers that slow spending, including the need to physically retrieve cash from an ATM, is likely to increase losses, particularly for people at moderate to high risk, unless those changes are paired with harm minimisation features. In the card model, the mandatory limits offset almost all of that increase.⁹
- 2.6 The Government's package does the reverse. It introduces ATMs into gaming venues and a ticket-based system that makes machines easier and faster to feed, while dropping the mandatory limits that Deloitte found were needed to offset the resulting increase in spending. In effect, the package retains the elements Deloitte identified as likely to increase losses and removes the element it found did most to reduce them.

⁵ ABC News, 'Tasmania to introduce new gambling reforms, including mandatory facial recognition', 23 January 2026.

⁶ Deloitte Access Economics, Social and Economic Impact of Electronic Gaming Machine (EGM) Reform use in Tasmania, report to the Department of State Growth, December 2025 (published 23 January 2026), Executive summary.

⁷ Deloitte Access Economics, above, Executive summary and sections 2.1–2.2.

⁸ Deloitte Access Economics, above, section 3.1.4.

⁹ Deloitte Access Economics, above, Executive summary and section 3.1.2.

No evidence for the replacement measures

- 2.7 AGR is not aware of any published modelling, evaluation or evidence showing that the replacement package will reduce gambling harm. Deloitte was engaged to assess the card, not the replacement measures, and nothing comparable has been published for the package the Government chose instead.
- 2.8 In March 2026, the Legislative Council called on the Government to confirm whether it had modelled the social and economic impact of the replacement measures, and whether it had obtained advice from the Liquor and Gaming Commission on their effectiveness before adopting them.¹⁰
- 2.9 Documents released under right-to-information laws show the Commission was not consulted before the measures went to Cabinet and did not receive the details until they were announced. When it did assess them, the Commission told the Treasurer it had no evidence that any of the measures would minimise harm, and warned that many would have the opposite effect and take Tasmania backwards.¹¹
- 2.10 The reasons the Government has given are not about harm. It has pointed to waiting for a national approach, to respecting personal choice and reducing red tape, to lower insurance costs for hoteliers holding cash, and to bringing Tasmania into line with other jurisdictions that use ticket systems.¹² None of these is evidence that the measures will protect anyone from harm.
- 2.11 In July 2026 the Treasurer issued a Ministerial Direction overriding the Commission's evidence-based rule for a standard statewide closure period, as set out in Section 6. Taken together, the Government has set aside its own commissioned modelling, did not seek the independent regulator's advice, disregarded that advice once given, and then overrode the regulator's attempt to strengthen one of the few measures with harm reduction value.

Questions for the Sub-Committee

- 2.12 AGR suggests the Sub-Committee seek answers from the Government to the following questions. What evidence or modelling, if any, supported each of the replacement measures? Which stakeholders were consulted, and when? Why was the Liquor and Gaming Commission not consulted before Cabinet approval? On what basis did the Government reject the findings of the Deloitte report it commissioned? And what advice informed the decision to override the Commission's standard closure period?

¹⁰ Legislative Council (Tasmania), Notice of Motion, 17 March 2026, paragraph (2).

¹¹ Pulse Tasmania, 'Tasmanian pokies policy will increase gambling harm, regulator warns', 15 July 2026, reporting the Commission's letter to the Treasurer of 31 March 2026.

¹² Hon Eric Abetz MP, Treasurer, media release, 23 January 2026; ABC News, 14 July 2026; CathNews, 'Regulator says Tasmania's gambling reforms "a step backwards"', 15 July 2026.

3. Facial recognition technology

Summary of recommendations in this section

- D. Facial recognition technology not be accepted as a harm minimisation measure or as a substitute for mandatory pre-commitment.

The proposal

- 3.1 Venues operating poker machines would be required to use facial recognition technology to identify patrons who are on the self-exclusion register.

AGR's concerns

- 3.2 Facial recognition can only identify people who have already placed themselves on a self-exclusion register. In AGR's experience, people typically self-exclude only once they have reached crisis point, often after significant financial loss and damage to their relationships, work and health. The technology does nothing for the much larger group of people who are experiencing harm but have not self-excluded, or who are sliding towards harm.
- 3.3 This is an industry-favored model precisely because it leaves the burden entirely on the person being harmed. It allows venues to continue drawing revenue from people at risk while pointing to the technology as evidence of care. It is reactive rather than preventive, and cannot be described as harm minimisation in any meaningful sense.
- 3.4 The introduction of facial recognition in venues also raises significant privacy questions about the collection, storage and use of biometric data, which the Sub-Committee may wish to explore.
- 3.5 AGR cannot support any legislative package that relies on this technology in place of mandatory pre-commitment.

4. On-site ATMs

Summary of recommendations in this section

- E. The existing prohibition on ATMs in venues with poker machines be retained.

The proposal

- 4.1 Venues would be permitted to host an ATM on the condition that it is fitted with facial recognition technology, with a limit on withdrawals every 24 hours.¹³ The limit has been reported as \$400. The Treasurer has argued that ATMs in venues would assist with the facial recognition technology and enable limits to be enforced.¹⁴

AGR's concerns

More cash, closer to the machines

- 4.2 ATMs are currently prohibited in Tasmanian venues with poker machines, and for good reason: immediate access to cash is a well-recognised driver of loss-chasing and impulsive gambling. At

¹³ Hon Eric Abetz MP, Treasurer, media release, 'New EGM harm minimisation measures implemented in Tasmania', 23 January 2026.

¹⁴ ABC News, 'New pokies policies will make things worse for problem gamblers, Tasmania's gaming commission says', 14 July 2026, reporting letters from the Tasmanian Liquor and Gaming Commission obtained under right-to-information laws.

present, patrons can withdraw up to \$200 in cash through EFTPOS.

- 4.3 The Tasmanian Liquor and Gaming Commission has warned that a \$400 ATM limit on top of the existing \$200 EFTPOS limit would triple the cash available to players, and that the initiative may create greater harm rather than minimise it.¹⁵ A daily withdrawal cap does not change the core problem. It still places hundreds of dollars of additional cash within metres of the machines at the moment a person is most likely to be chasing losses. It is also unclear whether the limit would apply per venue or across all venues, which would determine whether it offers any protection at all.

Facial recognition of every ATM user

- 4.4 To enforce a per-person withdrawal limit, the facial recognition system would need to capture and match the face of every patron who uses the ATM, not only people on the self-exclusion register. The Government has not published detail on how the system would work. This includes whether self-excluded people would be blocked from withdrawing, how long biometric data would be kept, who could access it, and whether it would be shared between venues.
- 4.5 Routine biometric scanning of ordinary patrons withdrawing cash at their local pub raises serious privacy concerns. In AGR's view, those concerns are not outweighed by any demonstrated harm minimisation benefit. AGR urges the Sub-Committee to seek this detail from the Government.

Who benefits

- 4.6 In defending the policy, the Treasurer pointed to the removal of insurance costs that hoteliers face for holding large amounts of cash on their premises.¹⁶ This is a benefit to venues, not a harm minimisation measure. There is no evident harm minimisation justification for reversing the current prohibition.

5. Ticket In-Ticket Out (TITO)

Summary of recommendations in this section

- F. Mandatory pre-commitment be adopted in place of TITO.
- G. If TITO proceeds, the rules be set in regulation before implementation and include a per-person daily purchase limit, registration of tickets to an identified player, redemption only at the issuing venue, and anti-money laundering safeguards developed with AUSTRAC.

The proposal

- 5.1 Tasmanian poker machines would move from coin-based play to a ticket system, with players loading money onto a ticket and inserting it into the machine. A ticket can be loaded with up to \$200, and a machine can hold no more than \$100 at any one time.¹⁷ The tickets have no daily limit and do not require registration.¹⁸
- 5.2 Much of the detail has not been published. The Government has said the Liquor and Gaming Commission will determine the regulatory framework, including taking into account risks such

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Hon Eric Abetz MP, Treasurer, media release, 'New EGM harm minimisation measures implemented in Tasmania', 23 January 2026.

¹⁸ ABC News, 'Tasmania to introduce new gambling reforms, including mandatory facial recognition', 23 January 2026.

as money laundering.¹⁹ It is not yet clear where tickets will be purchased (from machines or a staffed counter), whether tickets will be redeemable only at the venue that issued them, or whether there will be any limit on how many tickets one person can buy.

AGR's concerns

No effect on harm, and a risk of more

5.3 TITO, as announced, will have no meaningful effect on gambling harm. The \$200 limit applies per ticket, not per person. With no limit on how many tickets a person can buy, someone can buy ticket after ticket for as long as they have money, exactly as they can with coins today. A cap that can be bypassed simply by buying another ticket is not a cap.

5.4 The evidence suggests TITO may increase losses. The Liquor and Gaming Commission has told the Treasurer there is strong evidence that “tap and go” and TITO systems can produce a spending effect of up to 20 per cent, and that there is no evidence faster, easier play will protect anyone from harm.²⁰

Money laundering risk

5.5 TITO would introduce money laundering risks that do not currently exist in Tasmanian pubs and clubs. AUSTRAC has raised TITO as a potential method of money laundering²¹, and gambling researcher Associate Professor Charles Livingstone has warned that investigations show criminals buy tickets from other players for cash, for example by paying a winning player cash plus a premium for their ticket.²² Because tickets are unregistered, this kind of trade leaves no record linking the funds to the person.

5.6 If the final rules also allow a ticket bought at one venue to be redeemed at another, the risk grows further. Illicit cash could be converted into a ticket at one venue and cashed out at another, with little or no play in between.

5.7 The NSW Crime Commission’s Project Islington inquiry found that criminals were putting billions of dollars in illicit cash through poker machines in NSW pubs and clubs each year, that anonymous machine tickets were a vulnerability, and that there were no effective controls to detect or prosecute those involved. Its first and principal recommendation was a mandatory cashless gaming system.²³ The NSW Government accepted all eight of the inquiry’s recommendations.²⁴

5.8 The Government has responded that its reforms do not reduce venues’ existing anti-money laundering obligations. But those same obligations applied in NSW, where the Crime Commission found them ineffective at detecting laundering through machines. Tasmania should not introduce a system that recreates the vulnerabilities NSW has been working to close. A properly designed account-based pre-commitment card would address both harm and

¹⁹ ABC News, ‘Tasmania’s “ticket-in, ticket-out” pokies policy poses money-laundering risk, gambling researcher says’, 27 January 2026, quoting a Government spokesperson.

²⁰ ABC News, ‘New pokies policies will make things worse for problem gamblers, Tasmania’s gaming commission says’, 14 July 2026.

²¹ AUSTRAC, Money Laundering in Australia: National Risk Assessment 2024, July 2024, identifying the trade in tickets from electronic gaming machines as a key money laundering method; see also AUSTRAC, Pubs and Clubs with Gaming Machines: Regulatory Guide, 2025, available at https://www.austrac.gov.au/sites/default/files/2025-10/2025_AUSTRAC_RegulatoryGuide_Pubs_And_Clubs.pdf.

²² ABC News, 27 January 2026, as cited above.

²³ NSW Crime Commission, Project Islington: Inquiry into Money Laundering via Electronic Gaming Machines in Hotels and Clubs, October 2022; NSW Crime Commission media release, 26 October 2022.

²⁴ NSW Government, Response to the NSW Crime Commission and Independent Liquor & Gaming Authority NSW Project Islington Inquiry, February 2023.

money laundering at the same time. TITO addresses neither.

Minimum safeguards if TITO proceeds

5.9 AGR's strong preference is for mandatory pre-commitment in place of TITO. If TITO proceeds regardless, the most important safeguard is a firm limit on the total value of tickets any one person can purchase per day. It is the only way the system could have any effect on reducing harm.

5.10 To make that limit enforceable and to close the laundering risk, tickets should be registered to an identified player, redeemable only at the venue that issued them, and subject to anti-money laundering safeguards developed in consultation with AUSTRAC. Because these rules are yet to be settled, they should be set out in regulation and made public before TITO is implemented, rather than left to be worked out after the system is in place.

6. Gaming room closure hours

Summary of recommendations in this section

- H. The Commission's standard statewide closure period of 2am to 9am be reinstated, so that all gaming rooms close at the same time.

What has happened

6.1 The Government has extended the mandatory daily gaming room closure period from four hours to seven hours.²⁵ In June 2026 the Treasurer directed the Liquor and Gaming Commission to implement the seven-hour closure. After consulting industry and considering submissions, the Commission set a standard closure period of 2am to 9am for all hotels and clubs from 1 August 2026. It explained that a common closure time reduces the risk of patrons moving between venues to keep gambling in the early hours, which it described as an important harm minimisation measure.²⁶

6.2 On 29 July 2026, days before the rule took effect, the Treasurer issued a new Ministerial Direction requiring a seven-hour closure without specifying its start time, overriding the Commission's standard closure period and allowing venues to stagger their closing times.²⁷

AGR's concerns

6.3 AGR supports a longer closure period. However, if closing times are staggered, there will almost always be a gaming room open somewhere nearby. People experiencing harm, who are often chasing losses late at night, will simply move from one venue to the next.

6.4 The purpose of a mandatory 'break in play', which is to interrupt a session and give the person time away from the machines, is defeated by staggering. The Commission reached this conclusion through its own consultation process and acted on it within its statutory role. Overriding that decision removed one of the few elements of the package with genuine harm reduction value.

²⁵ Legislative Council (Tasmania), Notice of Motion, 17 March 2026, [above n 2](#).

²⁶ Tasmanian Liquor and Gaming Commission, correspondence to stakeholders, 20 July 2026, and Tasmanian Government Gazette, 24 June 2026 (Ministerial Direction), as reproduced in Meg Webb MLC, media release, 'Treasurer rides roughshod over Independent Gaming Commission', 30 July 2026.

²⁷ Special Tasmanian Government Gazette, 29 July 2026 (Ministerial Direction), as reproduced in Meg Webb MLC, media release, 30 July 2026.

7. Gaming Officers

Summary of recommendations in this section

- I. Gaming Officers be employed by, and accountable to, an independent statutory body rather than Hospitality Tasmania.
- J. The Government consider establishing an independent gambling harm ombudsman.
- K. An independent gambling harm ombudsman, consistent with proposals AGR has advocated for nationally, would further strengthen accountability.

The proposal

7.1 The Government plans to introduce at least three “gaming care officers” to engage with venues about poker machine harm, including checking compliance and offering support to people experiencing harm. The officers would be employed through Hospitality Tasmania, formerly the Tasmanian Hospitality Association.²⁸

AGR’s concerns

7.2 AGR supports dedicated officers in principle. However, Hospitality Tasmania is the principal lobby group for the gaming venues these officers would be monitoring, and it advocated strongly against previous broad poker machine harm reduction measures, including the pre-commitment card.

7.3 In our view, this creates a conflict of interest where an industry body employs and directs the people responsible for checking that its own members comply with the law, and for supporting people harmed by its members’ products. Compliance and support functions must be independent to be credible, both to the public and to the people who need help.

8. Instant QR-code self-exclusion

Summary of recommendations in this section

- L. Instant QR-code self-exclusion be implemented as proposed.

8.1 AGR supports the introduction of technology that allows people to self-exclude instantly by scanning a QR code in a venue. Removing barriers to self-exclusion at the moment someone decides to seek help is a positive step.

8.2 AGR notes, however, that self-exclusion remains a last-resort tool. It helps people who have already recognised they are in trouble, and is not a substitute for measures that prevent harm in the first place.

9. Conclusion

9.1 Tasmanians lost more on poker machines in 2024-25 than in any year in the past decade. The Government had a nation-leading, evidence-based reform ready to go, supported by its own economic modelling, and replaced it with measures that are largely reactive, favour the industry, and in some cases will make things worse.

9.2 AGR urges the Sub-Committee to recommend that the Government return to mandatory pre-

²⁸ ABC News, ‘Tasmania’s “ticket-in, ticket-out” pokies policy poses money-laundering risk, gambling researcher says’, 27 January 2026; see also Legislative Council (Tasmania), Notice of Motion, 17 March 2026, above n 1.



commitment, and in the meantime to ensure that any measures that do proceed are strengthened as set out in this submission. AGR looks forward to appearing before the Sub-Committee to expand on these matters.



**ALLIANCE FOR
GAMBLING REFORM**

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