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Tasmanian Government

Hon Cassy O'Connor MLC
Chair
Sessional Committee Government Administration A Sub Committee
Email: pmhm@parliament.tas.gov.au

Dear Chair

Thank you for the invitation from the Legislative Council Sessional Committee Government Administration A Sub Committee to provide a submission to the Short Inquiry into Recent Developments Relating to Government Policy on Poker Machine Harm Minimisation.

Economic and social impacts of EGM activity

The most recently published Fifth Social and Economic Impact Study (SEIS 2021) commissioned under the gaming regulatory framework considered the broader economic and social impacts of gaming in Tasmania, including the costs and benefits associated with electronic gaming machines. While the SEIS 2021 recognised the harms associated with problem gambling, it also examined broader economic effects, including impacts on employment, business activity, government revenue and consumer benefits. The study highlighted the complexity of assessing the overall economic impact and identified a range of plausible outcomes depending on the assumptions adopted and the weight given to different economic and social factors.

Furthermore, the SEIS findings did not present a clear or unequivocal conclusion about the impacts of EGM activity on the Tasmanian economy. The study finds total benefits of expenditure on EGMs of between $8.8 million and $21.3 million. Overall, the net social and economic impacts of gambling for the State are calculated as between -$36.3 million and $158.9 million annually, which leads the study to conclude: "Given that most of the plausible range is positive it is likely that gambling delivers a net benefit for the Tasmanian community."[1]

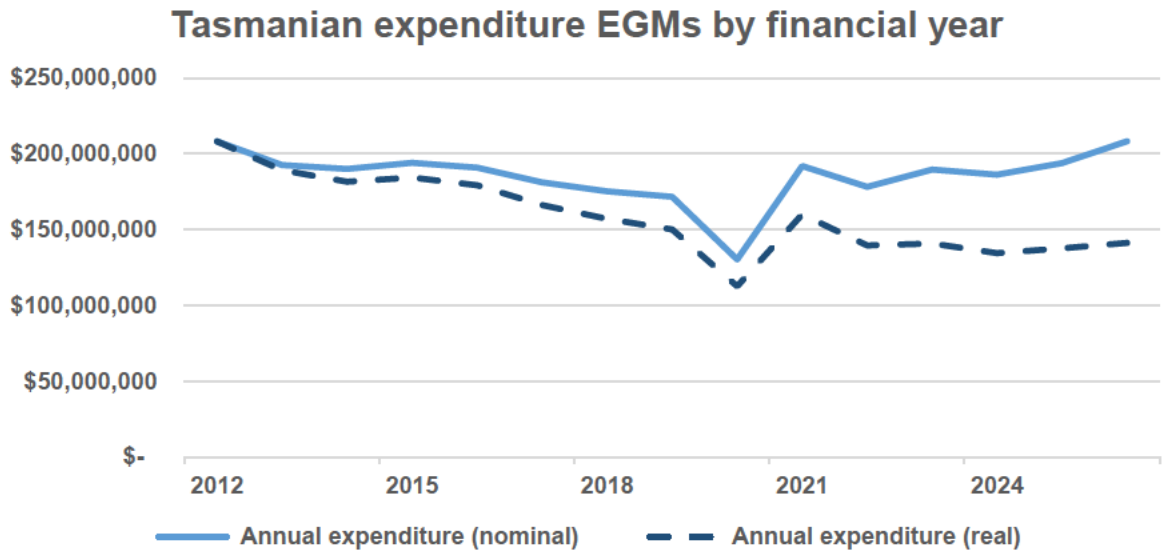
The results of the Deloitte report are not directly comparable to the results of the SEIS 2021 because the Deloitte report does not consider the impact of gambling on the State in its totality; rather, it focuses on the potential impact of a set of potential reforms to EGM gambling. The Deloitte report does not take into account the state taxation revenue

[1] Fifth SEIS 2021, Vol. 1: *Industry Trends and Impacts*, Executive Summary, p. i.

generated as a result of gambling activity, for example, and it considers social cost and economic impact from an integrated perspective rather than individually (as the SEIS does).

Tasmania has the lowest density of EGMs of any state permitting gaming outside casinos, the lowest spend per capita and the lowest prevalence of problem gambling. The reform package announced by the Government will further strengthen that position.

Claims of 'record losses' that are sometimes cited should be viewed in the context of hard data. When analysed in real terms, expenditure on EGMs has declined substantially over the past decade or so, while the Tasmanian population size has also increased by over 10 per cent over the period charted, meaning that this chart clearly understates falls in expenditure per capita on EGMs over this time period.



Source: Department of Treasury and Finance, Tasmania

Background to the Government's package of EGM harm minimisation measures

The package of EGM harm minimisation measures announced on 23 January 2026 reflects an approach grounded in harm minimisation rather than prohibition. It seeks to balance the protection of vulnerable Tasmanians with respect for individual autonomy and lawful recreational choice. Personal agency is a fundamental consideration in achieving that balance.

The package of measures was informed by advice from a wide range of sources. Significant preparatory work was undertaken by previous Ministers which contributed to the identification and assessment of potential measures that informed the Government's announced harm minimisation package.

Treasury's role under the *Gaming Control Act 1993* includes providing policy advice to the responsible Minister on gaming regulation, including measures to minimise gambling-related harm associated with EGMs. Accordingly, Treasury undertook work to investigate potential reforms and provide advice to Government on options for a broader harm minimisation package.

Treasury's policy analysis and advice to Government also built upon work previously undertaken in relation to player card gaming and harm minimisation measures.

To inform policy development, Treasury officers undertook targeted investigations of interstate harm minimisation initiatives, including a study visit to South Australia in December 2024. Treasury met with Consumer and Business Services South Australia, the state's gaming regulator; the Independent Gaming Corporation, which operates South Australia's central monitoring system; industry representatives from hotel and casino operators; and facial recognition technology providers. Treasury officers also undertook onsite visits to gaming venues operating facial recognition technology and automated risk monitoring systems. The work examined exclusion and self-exclusion arrangements, facial recognition technology, automated risk monitoring systems, central monitoring arrangements, privacy and data management considerations, implementation costs, compliance frameworks and practical lessons arising from South Australia's experience. Findings from these discussions informed Treasury's assessment of available policy options and advice provided to Government regarding potential harm minimisation reforms, although not all options were accepted by Government.

As part of this role, Treasury undertook policy development work and prepared a range of potential harm minimisation measures for the Government's consideration. This work drew upon existing evidence, previous SEIS, interstate regulatory approaches, stakeholder engagement, operational experience, and consideration of available regulatory and technological options. Some measures investigated by Treasury were incorporated into the package announced by the Government on 23 January 2026, while others were not adopted.

An example of a measure investigated but not included in the package is changes to the spin rates applying to Tasmanian EGMs. In practice, implementing such a change would not be a simple adjustment as there is no simple EGM programming or implementation measure that allows for the spin rate to immediately be varied as the spin rate setting is hardcoded to the EGM software.

Consequently, new EGM game software would need to be separately developed by manufacturers for the Tasmanian market. All games (old and new) would need to be independently tested and approved by the Tasmanian Liquor and Gaming Commission (the Commission) before being approved for operation. If spin speed requirements were altered from the current 3 second minimum, it is anticipated there would be supply problems, noting that Tasmania is a small participant in the national gaming machine market, having less than two per cent of the national EGM market.

Appearance of the Tasmanian Liquor and Gaming Commission in front of the Sub Committee

This submission partially reflects and responds to comments made by the Commission during its appearance before the Sub Committee on 25 September 2026, noting that a transcript of that appearance was not available at the time of writing. My office has been advised by the Secretary of the Sub Committee that the transcript of the broadcast will not be available until after this submission is due. The transcript will be reviewed when it

becomes available in preparation for the appearance before the Sub Committee. The right to supplement this submission should any clarification be required is requested.

Irrespective of any views of the members of the Commission expressed at their appearance, it is the role of Government to set policy direction and that of the Commission to implement this direction. This is not to say that the Commission does not have a significant role in shaping implementation of policy and providing information to Government, as it did in relation to facial recognition technology and other matters. It is also a fact that Treasury officers engage regularly with the Commission its operational capacity, however, this is not to say that the Commission has visibility of all work undertaken by Treasury or advice by Treasury to the Treasurer.

For the benefit of the Sub Committee, irrespective of any views expressed by the Commission at their appearance, there is no uncertainty from the perspective of the Government that the Commission will implement measures contained in the Ministerial Direction. While noting the statutory responsibilities of the Commission, a letter dated 3 June, from the Commission confirmed:

"*The Commission remains committed to supporting the implementation of the Government's EGM measures and to working collaboratively with Treasury and industry to achieve intended policy outcomes*."

The Commission's clear commitment as articulated above in engaging productively with the Government is appreciated.

Interstate developments

As part of the 23 January 2026 announcement the Government undertook to continue to monitor progress interstate of the pre-commitment gaming card, and the Premier wrote to all states and territory First Ministers.

For the benefit of the Sub Committee it is noted that two jurisdictions wrote in reply, neither of which provided any indication of consideration of progressing pre-commitment gaming cards.

An assertion that other jurisdictions were looking to Tasmania as leaders of a pre-commitment card should be caveated with the observation that this assertion is at odds with public positions taken by Governments, while noting the exception of a suite of gambling reforms very recently announced, but not yet implemented, in the ACT in September 2026.

Package of harm minimisation measures announced 23 January 2026

The package of measures announced on 23 January 2026 by the Government is a comprehensive, balanced and responsible set of measures that strengthen protections for vulnerable Tasmanians, modernising regulations and systems, and clearly separates policy direction from enforcement.

The Government has considered a range of policy approaches proposed in other jurisdictions, including mandatory carded play systems, and has instead adopted a package of measures it considers balanced, practical and proportionate for Tasmania.

Taken together, this is a substantial and balanced package that will reduce harm from EGMs in Tasmania while allowing personal agency. The measures are intended to provide a more modern, safer and more convenient gaming experience, comparable with other jurisdictions while retaining low load-up limits.

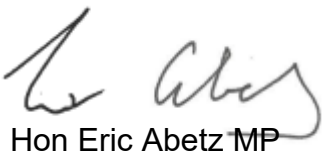
This submission, on behalf of the Government, has sought to provide information for the benefit of the Sub Committee and the public record on the package of measures in an attachment to this letter.

Conclusion

The Tasmanian Government is getting on with the job of delivering a strong suite of new harm minimisation measures for electronic gaming machines in hotels and clubs to take strong action to protect those who need it while also respecting individual choice.

The Government does not shy away from the reality of gambling harm and the right of Tasmanians to determine their own leisure activities. Nor does it claim that any single reform will resolve all issues.

Yours sincerely



Hon Eric Abetz MP
Treasurer

cc Hon Jeremy Rockliff MP, Premier
Hon Roger Jaensch MP, Minister for Hospitality, Tourism and Events

Attachment – Information of measures included in the Government's EGM harm minimisation package

Regulatory measures

The Government's package of measures should be viewed as a whole.

It combines restrictions on availability, reductions in machine numbers, enhanced exclusion mechanisms, stronger intervention opportunities, modernised operating systems and additional support services.

No single measure is intended to operate in isolation. Rather, the package is designed to deliver cumulative harm minimisation benefits while maintaining a lawful and regulated gambling environment.

Mandatory closure period

The Government has increased the mandatory daily shutdown period for gaming areas in hotels and licenced clubs from four to seven continuous hours, delivering the longest mandatory shutdown period for electronic gaming machines of any Australian state or territory.

This measure is intended to reduce opportunities for extended gambling sessions, particularly during late night and early morning periods when patrons may be more vulnerable to making impaired or impulsive decisions.

Table – Comparison of daily trading hours by jurisdiction

State	QLD	VIC	NSW	SA	NT	TAS
Trading Hours	10am - 4am (Some late exemptions)	10am - 4am (No Exemptions)	10am - 4am (Some late exemptions)	6 Hour Shutdown Period (Flexible)	10am - 4am (No Exemptions)	7 Hour Shutdown (Flexible)

Current as September 2026

The seven-hour daily closure period replaced the four-hour mandatory closure period that had applied to gaming venues since 1 July 2008, the timing of which was fully flexible at the discretion of each venue. From an implementation perspective, the closure period will continue to be administered and monitored through the Licensed Monitoring Operator, Maxgaming, in much the same way as the previous four-hour closure requirement.

A longer daily closure period is a harm minimisation measure that targets the availability of gambling rather than the behaviour of individual patrons. By requiring gaming areas to remain closed for a substantial continuous period, the reform creates a natural break in

gambling activity and makes it more difficult for players to engage in prolonged sessions that can contribute to gambling-related harm.

Benefits of this measure include:

- Reducing intensive gambling behaviour by limiting access during periods commonly associated with extended play and higher-risk gambling patterns.
- Supporting player wellbeing by encouraging breaks between gambling sessions and reducing opportunities for continuous play over long periods.
- Aligning with harm minimisation objectives that recognise gambling harm is influenced not only by individual behaviour but also by the availability and accessibility of gambling products.
- Providing a simple and enforceable regulatory measure, avoiding the need for venue staff to make subjective judgements about individual patrons while delivering a consistent statewide standard.
- Reducing the risk of gambling-related financial harm, as fewer hours of operation may reduce opportunities for significant losses during prolonged gambling sessions.
- Supporting venue staff and patron safety, particularly during overnight periods when staffing levels may be lower and patrons may be affected by fatigue or alcohol consumption.

Importantly, the measure does not prevent adults from participating in lawful gambling activities. Rather, it seeks to strike an appropriate balance between consumer choice and the Government's objective of minimising gambling-related harm across the community.

By reducing the total hours that electronic gaming machines are available each day, the reform is expected to contribute to a safer gambling environment while maintaining the viability of licensed hotel and club operations.

Further background to comments of this measure made by the Commission by the Sub Committee on this measure

For the benefit of the Sub Committee, a copy of the 24 July 2026 letter sent to the Commission has been provided. That correspondence related to the Commission's intention to require a standard statewide closure period of 2.00 am to 9.00 am each day from 1 August 2026.

This correspondence was informed by concerns by affected venue operators prior to writing to the Commission. However, as is clear from this correspondence, the key concerns expressed did not relate to the introduction of a seven-hour mandatory closure period, which remains Government policy. Rather, they related to the Commission's decision to remove operational flexibility that had existed for 18 years without adequate consideration of the impacts on affected venues.

As outlined in correspondence to the Commission, the operational and employment impacts associated with a prescribed statewide shutdown period warrant careful consideration. Several venues indicated that they currently trade during the morning period, including providing breakfast services, and that these impacts did not appear to have been fully considered had the proposal to mandate a statewide closure window been identified earlier in the consultation process.

In particular, these operators advised that the consultation process did not clearly indicate that a uniform statewide shutdown period was being contemplated and had this issue been identified during consultation, their submissions would have addressed the operational impacts of removing the long-standing flexibility for venues to determine their closure times.

It is also possible that this issue may have been identified had the Commission consulted Hospitality Tasmania, the relevant industry peak body.

As noted by the Commission in its evidence to the Sub Committee, only five Tasmanian venues were operating between 2.00 am and 9.00 am. Further, consultation feedback provided to the Commission by some of those venues indicated they had no intention of trading beyond 2.00 am under what they understood would be a flexible seven-hour mandatory daily closure arrangement.

The Government notes the Commission's comments to the Sub Committee that a standard statewide closure period was considered necessary to reduce the potential for patrons to move between venues during overnight hours. It is not immediately apparent why this concern would be more pronounced under a seven-hour closure regime than under the previous four-hour arrangements, noting that the earlier settings provided a longer period during which patrons could potentially move between venues.

It is also relevant that only a small number of venues operated after 2.00 am under the previous flexible four-hour mandatory closure arrangements, and that number was expected to reduce further following the introduction of a seven-hour closure requirement. Further, the Commission had the regulatory flexibility to implement a more consistent statewide approach under the previous framework if it considered such a measure necessary.

And finally, venues rarely alter their operating hours, suggesting little risk of venues newly electing to operate after 2.00 am. Consequently, from the Government's perspective, the case for replacing the flexible arrangement that had existed for 18 years with a prescribed statewide closure period as a necessary harm minimisation measure was not established.

Discussions with the Commission indicated limited willingness to consider alternative arrangements that may have preserved trading flexibility for affected venues while still delivering the seven-hour mandatory closure period. Such alternatives could have included grandfathering arrangements or other mechanisms for the small number of venues that currently trade between 7.00 am and 9.00 am. My discussions with the Commission were focused on those venues and the potential operational and employment impacts arising from a mandated closure period through to 9.00 am daily.

In this context, where the Commission appeared unwilling to give sufficient consideration to the operational impacts on affected businesses and where the case for a prescribed statewide closure period had not been clearly established, the decision was taken to issue a revised Ministerial Direction to the Commission.

It is important that industry stakeholders have confidence that consultation and engagement processes are genuine and that operational impacts are appropriately considered alongside harm minimisation objectives. While fully respecting the Commission's independence, the Government does not consider that a uniform approach will necessarily be appropriate in every circumstance. In this instance, the Government formed the view that retaining some operational flexibility better balanced harm minimisation outcomes with the practical impacts on affected businesses and acted accordingly.

Progressive reduction of the EGM cap

Reducing the number of electronic gaming machines (EGMs) available in Tasmania is a clear and administratively simple harm minimisation measure, based on the principle that lower machine availability can reduce opportunities for gambling-related harm.

Legislation permits up to 2,350 EGMs in hotels and clubs and 1,180 EGMs in casinos. The Ministerial Direction effectively caps the number of EGM authorities at the level in operation on 1 July 2026 and includes a mechanism to progressively reduce the effective statewide cap through natural attrition. This ensures that the total number of operating EGMs can decrease over time without requiring amendments to the statutory caps set out in the Gaming Control Act.

This aspect of the Direction will prevent future growth in EGM numbers while avoiding the need to remove existing machines from venues. It is a practical harm minimisation reform because it would gradually reduce machine availability over time without directly affecting current venue operations.

There has been commentary regarding the number of authorised EGMs in hotels and clubs, and the extent to which pending applications have contributed to EGM numbers reaching the statutory cap. The factors driving this outcome may be subject to debate. However, the data is not disputed, the outcome is consistent with the parameters of the Ministerial Direction, and the relevant figures are publicly available on the Treasury website. Over time, the impact of the reform will be transparent and measurable, as the number of EGMs in Tasmania can only decline under the current policy settings.

Access to cash (ATMs and EFTPOS)

This aspect of the reform allows venues to leverage technology to strengthen controls around access to cash. For the benefit of the Sub-Committee, arrangements around access to cash in Tasmania currently in effect are as follows:

- Hotels and clubs and casinos (EFTPOS cash withdrawals): a maximum cash withdrawal of $200 per customer per day (Code 2.2 of the Responsible Gambling Code of Practice).

- Casinos (ATM cash withdrawals): a maximum cash withdrawal of $400 per customer per day (Code 2.16 of the Responsible Gambling Code of Practice).

- Hotels and clubs (ATMs): ATMs and other cash access devices, other than approved EFTPOS facilities, are prohibited under Rule 7.10 of the Tasmanian Liquor and Gaming Commission Rules.

While some commentary has focused on the increase from $200 to $400, this change should be considered in context of an unchanged limit of $200 for more than a decade and has declined substantially in real terms as a result of inflation. Since the limit of $200 was set in 2012, Hobart's Consumer Price Index has increased by almost 40 per cent.

Most importantly from a harm minimisation perspective, the reform replaces a predominantly manual monitoring system with technology capable of enforcing limits more effectively and consistently. Patrons of hotels and clubs will continue to have access to cash within venues, as they do currently, but through a system that enables withdrawal limits to be monitored and enforced more reliably.

The package of measures directs the Commission to permit approved ATM and EFTPOS facilities incorporating facial recognition or other biometric technology. Patrons using these facilities would be subject to a daily withdrawal limit of $400, helping to ensure that cash access restrictions can be applied consistently and effectively across venues.

Shortcomings in the current paper based system were well canvassed by the Commission to the Sub Committee, as was the potential for use of biometric technology to deliver a more reliable compliance and enforcement framework while reducing the administrative burden on venue staff.

The expectation of the Commission set through the Ministerial Direction is to deliver a framework that permits ATM or EFTPOS cash-withdrawal devices to operate in hotels and licensed clubs only where the device is equipped with approved facial recognition and/or biometric technology that ensures a patron may withdraw no more than a total of $400 daily.

As was evident at the Commission’s appearance before the Sub Committee, the Commission has relevant knowledge of policy issues relating to the operation of ATMs in casinos. However, there is no suggestion through the Ministerial Direction that it is a requirement of the Commission to develop the technology. In broad terms, it is simply to require an outcome and set relevant rules, such as where ATMs may be in relation to gaming areas.

A $400 daily withdrawal limit would remain broadly consistent with settings in other Australian jurisdictions, including daily limits of $500 in both Victoria and South Australia. As such, the proposed limit represents a moderate and balanced approach that strengthens the enforceability of cash access controls while continuing to support harm minimisation objectives.

Facial recognition and the Tasmanian Gambling Exclusion Scheme (TGES)

Facial recognition technology

Facial recognition technology, as a harm minimisation measure, is used to identify excluded or barred patrons from gambling venues.

In December 2021, the then Minister for Finance directed the Commission to investigate the extent to which facial recognition technology (FRT) and player card gaming for EGMs in casinos, hotels and clubs could minimise gambling harm.

The Commission found that:

- FRT is an effective way to detect a known subject by comparing an image captured by a video camera against a control image stored in a system, producing an alert when a match is found using biometrics i.e. face measurements to identify a person.
- In a gaming setting, FRT can be used to limit access for self-excluded people to terrestrial gaming venues, such as in casinos, hotels, and clubs. Human intervention is still required to both confirm a person's identity when a control subject is recognised, and to act appropriately in order to assist the excluded person who has entered the venue.
- FRT does not offer any predictive capabilities, and it does not operate as a preventative tool for those people who may be at risk of gambling harm but who have not excluded themselves from gambling.
- FRT technology has been implemented in South Australia, New Zealand and the United Kingdom as a tool for identifying excluded players entering gaming venues.

The Government acknowledges that the introduction of FRT raises important privacy considerations. Maintaining public confidence will require ensuring that privacy concerns are appropriately addressed and that personal information is collected, used and stored responsibly. Responsibility for these implementation matters rests with the Commission, supported by Treasury.

It is equally important that FRT is used appropriately within venues and that any interventions prompted by the technology are undertaken consistently and in accordance with regulatory requirements. The development of these operational arrangements, including appropriate safeguards and oversight mechanisms, will also be a matter for the Commission.

TGES upgrade

Implementation of FRT will support the effectiveness of the TGES, which is administered by Treasury. Enhancements to the TGES will provide more effective and efficient support for those struggling with gambling issues and offer several benefits, including:

- simplified process: moving away from the counsellor-facilitated self-exclusion process to a streamlined online application makes it easier and quicker for individuals

to self-exclude, reducing barriers to accessing help. A self-facilitated online process also removes the barrier for those hesitant to engage with counselling services due to feelings of shame, embarrassment, and fear of being judged;

- accessibility: implementing a QR code for easy accessibility in venues ensures that individuals can quickly and discreetly access self-exclusion options and support services, making the process more user-friendly; and

- increased reach: these changes can potentially reach more people who need help with their gambling behaviour, as the simplified and accessible process encourages more individuals to take the necessary steps to self-exclude.

The Government regards the TGES as an important harm minimisation tool and supports reforms that make exclusion processes easier to access and more effectively enforced.

It is widely recognised that the current self-exclusion process is cumbersome and that the supporting system is approaching the end of its operational life. Replacing the existing system provides an opportunity to introduce an immediate self-exclusion process.

These changes will make it easier for people seeking support to enrol in the exclusion scheme when they are most motivated to make a change, compared with the current multi-step process, which can take several weeks to complete.

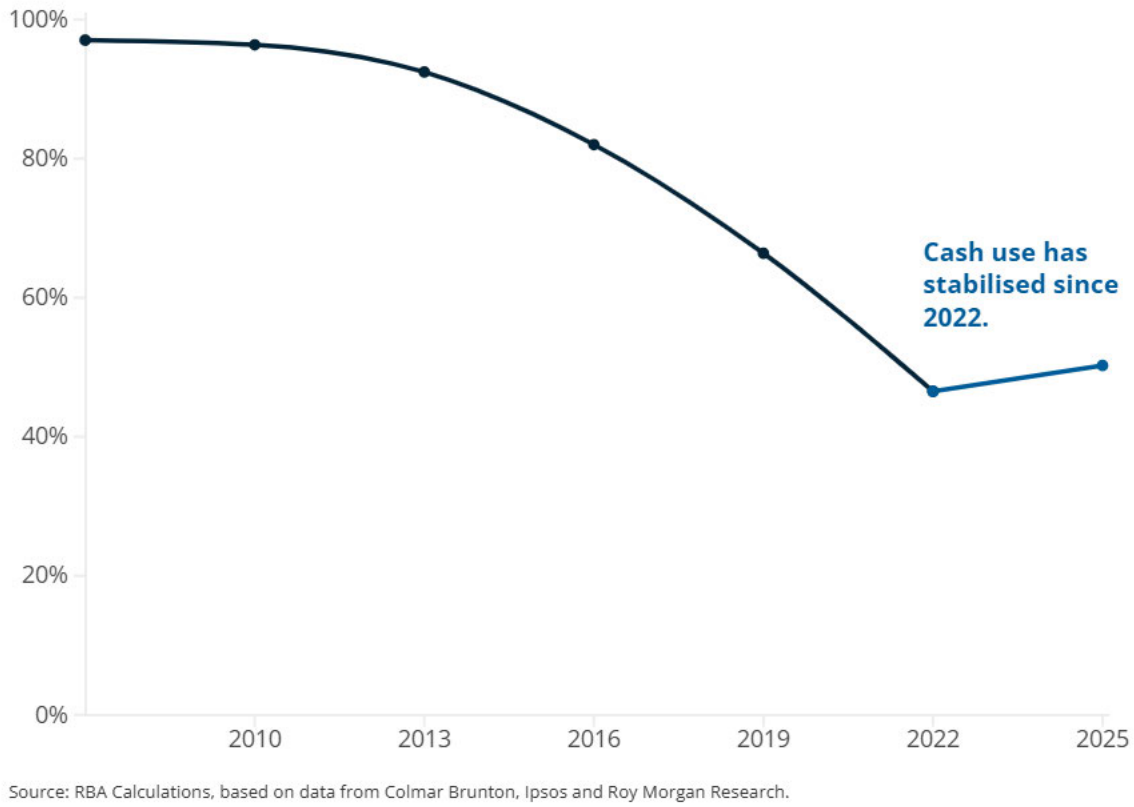
Further, by linking venue systems with exclusion records, FRT will provide a more effective and consistent method of identifying excluded individuals and supporting venue staff to enforce exclusions in real time.

The Government considers these reforms will significantly strengthen the effectiveness of existing exclusion arrangements and provide greater protection for vulnerable patrons, while easing the load on venue staff.

Ticket-in-ticket-out

The decline in cash use provides important context for consideration of this reform.

Chart - Share of Australians using cash in a typical week



Source – Reserve Bank of Australia

Over the last 20 years, Australia has moved from being a predominantly cash-based economy to one where electronic payments are the norm. According to the Reserve Bank of Australia, around 70 per cent of consumer payments were made using cash in 2007. By 2025, that figure had fallen to around 15 per cent[2].

In this practical context, it is increasingly difficult to justify maintaining Tasmania as the sole jurisdiction requiring a cash-only EGM system in hotels and clubs.

This change in play system is being introduced in a jurisdiction that already has the lowest EGM density outside casino-only jurisdictions, the lowest per-capita EGM expenditure and the lowest prevalence of problem gambling. The Government's objective is to further strengthen a system that is already comparatively low-risk by Australian standards.

[2] Reserve Bank of Australia, *Cash Use in Australia: What the 2025 Consumer Payments Survey Tells Us*.

Moving away from coin-based play is necessary for the effective operation of TITO. Combined with the proposed loading limits, the reforms are intended to reduce the ease with which large amounts can be loaded directly into EGMs and introduce additional friction into the gambling process. This represents a significant change from the current coin-based model and supports the Government's broader harm minimisation objectives.

For the benefit of the Sub Committee, a copy of the 23 June 2026 letter to the Tasmanian Liquor and Gaming Commission is enclosed. The letter responded to feedback provided by the Commission in its letter of 3 June 2026 regarding the Government's harm minimisation package.

As expressed in that correspondence, while the transition from a coin-based cash model to a Ticket-in Ticket-out (TITO) system is, in part, a modernisation measure reflecting changing patterns of cash use in society, the Government also considers it an important component of a broader package designed to strengthen controls, increase opportunities for intervention and reduce uninterrupted gambling sessions.

TITO is the established national standard across Australian hotels, clubs and casinos and has been for many years. The reform therefore modernises Tasmania's regulatory framework while retaining stronger loading restrictions that apply elsewhere in Australia.

Under the current coin-based system in Tasmania, there are no prescribed limits on the total amount that may be loaded into an EGM over the course of a gambling session. While patrons must physically obtain and insert coins, machines may generally be reloaded throughout play, with limited regulatory controls over the value loaded during a session.

Under the proposed reforms, that position fundamentally changes. The introduction of TITO enables enforceable limits on the amount of money that can be loaded into a machine in a single transaction. The proposed limits of $100 in cash and $200 via ticket would be the strictest machine loading limits in Australia. While these limits do not cap a patron's total expenditure over the course of a session, they constrain the amount that can be loaded at any one time and introduce greater controls around access to funds during play.

While noting the role of the Commission in determining the operational requirements for TITO, it may choose to require that, once a machine has been loaded to the applicable limit, no further loading can occur until those credits are exhausted. Although this requirement is not prescribed by the Ministerial Direction, it is anticipated that these are the types of operational controls the Commission would consider requiring, noting that the setting can be readily configured on gaming machines. Measures such as this would break play into discrete stages, rather than permitting seamless credit replenishment, and would introduce clear interruptions to play that are not present under Tasmania's current coin-based system.

The Government's view is that the features of the proposed TITO model, when complemented by enhanced staff training and the introduction of Gaming Care Officers, will create greater opportunities for venue staff to identify breaks in play and engage appropriately with patrons where intervention may be warranted. This supports the broader harm minimisation objectives of the Government's reform package.

While concerns have been raised by the Commission regarding the inclusion of banknote acceptors within the TITO model, the Government remains of the view that the proposed arrangements represent a significant improvement on the current system. The combination of loading limits, ticket-based credit transfers and identifiable breaks in play provides a framework that better supports responsible gambling outcomes while modernising the operation of EGMs in Tasmania.

As acknowledged by the Commission during its appearance before the Sub Committee, TITO is the established national standard, and Tasmania is now the only jurisdiction that continues to mandate a coin-only EGM model in hotels and clubs.

While TITO reflects contemporary practice across Australia, the Tasmanian model incorporates additional safeguards not generally found elsewhere. The proposed load limits of $100 cash and $200 via ticket would be the strictest machine loading limits in the nation and are intended to limit the amount that can be loaded into a machine in a single transaction while providing a stronger regulatory framework around machine loading.

The Government does not consider that the proposed model will materially increase money laundering risks because of the impracticality and tediousness of such an exercise beside being exceptionally obvious within venues. It is acknowledged, however, that TITO systems create different money movement risks to traditional coin-based arrangements. Monitoring of the TITO system by the operator, together with the operation of Commonwealth anti-money laundering and counter-terrorism financing requirements administered by AUSTRAC, venue obligations, transaction monitoring arrangements, and the practical constraints associated with high-volume ticket transactions, provide important safeguards.

While this is not specified in the Ministerial Direction, it is anticipated that the Commission would utilise the functionality available within relevant TITO systems to identify and address suspicious activity. It is well established that TITO systems generate transaction records and can be monitored for suspicious patterns, including:

- repeated cash-in and cash-out activity with minimal or no gameplay;
- high-frequency ticket redemptions over a short period;
- repeated cycles of cash insertion, negligible betting and rapid cash-out; and
- structuring transactions to avoid reporting thresholds.

In practice, TITO creates an electronic record of transactions that can be monitored and analysed. By contrast, a coin-based system provides limited capacity to identify unusual patterns of activity, detect potentially suspicious behaviour, or implement targeted controls. As a result, TITO offers significantly greater opportunities for oversight, intervention and regulatory monitoring than are available under a coin-based system of play.

Non-regulatory harm minimisation measures

Gaming Care Officers

For the benefit of the Sub Committee, a copy of a 3 November 2025 letter to the Tasmanian Liquor and Gaming Commission, which was also sent to other stakeholders, that sets out key details regarding the operation of Gaming Care Officers is enclosed.

As stated in this correspondence, under the proposed model, these officers would be employed through Hospitality Tasmania and their roles and responsibilities may include, but are not limited to:

- Building capability in venues: cooperate with venues operating electronic gaming machines to implement strategies that help mitigate gambling harm and detect indicators of harm, including how to start respectful conversations with patrons and document concerns.
- Strengthening referral pathways: helping staff intervene early and make referrals to the appropriate support providers/options.
- Supporting compliance: guidance on obligations, policy and procedures, including oversight of gambling incidents and recording instances of potential or actual gambling harm identified in venues.
- Collaboration: liaise with gaming industry stakeholders, care and concern groups and the regulator to deliver consistent and coordinated support and participate in gambling research and policy activities.

These officers will work collaboratively with venue staff through education and training to recognise indicators of gambling-related harm and assist in accurately documenting patron behaviour.

The Department of Treasury and Finance has been engaging with Hospitality Tasmania since earlier in the year with a view to establishing a funding deed. Discussions have been productive and the parties are working to finalise a draft agreement for consideration by the Government.

Measures to be delivered through the Gambling Support Program

DPAC's Gambling Support Program (GSP) delivers the Tasmanian Government's non-regulatory response to gambling harm, including:

- Specialist gambling support services;
- Community education and awareness programs;
- Tasmanian research projects;
- Community partnership programs; and
- Community grants programs.

The Gambling Support Program is funded through the Tasmanian Government's Community Support Fund (CSF), which is primarily funded by a levy on electronic gaming machines.

Programs and initiatives delivered through the Gambling Support Program are informed by contemporary research, data and practice, including the SEIS, publicly available Tasmanian gambling loss data, support service activity information, outcomes from relevant grant programs, academic and government-commissioned research, and inter-jurisdictional policy and practice experience. Impact studies, including the SEIS, provide an important evidence base for the Gambling Support Program harm reduction and prevention activities.

This approach helps ensure that Gambling Support Program activities are evidence-based, targeted and responsive to identified gambling harm risks and support needs in Tasmania.

In early 2025, DPAC provided information to Treasury on potential additional non-regulatory actions that the Gambling Support Program could deliver to reduce the harm associated with electronic gaming machines (EGMs). Two key activities, a peer support lived experience program and counselling videos, have been identified to enhance existing programs and improve gambling harm reduction and prevention outcomes.

Funding for these programs will be managed through additional allocations to the GSP from the Community Support Fund, rather than at the expense of existing programs.

Peer support lived experience program

The GSP will deliver a study into the feasibility of introducing a program to provide gambling support through a peer-based lived experience program, including reviewing programs in other jurisdictions and exploring potential models, costs and outcomes for Tasmania.

Support provided through a peer-based lived experience program may complement and enhance existing support services and provide a support pathway for people that may be reluctant to access traditional support options.

The activity is based on inter-jurisdictional experience and academic research. Lived experience programs are delivered through different approaches in several jurisdictions, including New South Wales, Victoria, the Australian Capital Territory and South Australia.

A range of presentations at National Association for Gambling Studies conferences have emphasised the benefits of such programs for people that are experiencing gambling harm but are not motivated to engage with traditional counselling support.

Existing research from Deakin University, Monash University and Central Queensland University highlights the potential benefits of peer support programs in engaging people who may be reluctant to access traditional counselling or treatment services.

The research also identifies important implementation considerations, including the recruitment and support of suitably qualified peer workers, the provision of consistent training and supervision, and the establishment of appropriate governance and evaluation frameworks.

The feasibility study to be progressed through the Gambling Support Program will consider these factors in assessing the suitability, effectiveness and sustainability of a peer support lived experience model for Tasmania.

Counselling videos

The GSP will work with service providers and creative agencies to develop videos which provide accessible, factual information to demystify the counselling process for people who may be reluctant to seek support.

Extensive research has found that only a small proportion of people experiencing gambling harm seek help. This can mean that people either never seek help or only do so at a point at which a crisis outweighs concerns regarding shame and stigma. For some people, research has identified that fear of judgement from counsellors or people they know can be a barrier to seeking support.

Videos explaining how counselling works has the potential to reduce a range of uncertainties and anxieties about accessing support while also normalising and destigmatising help-seeking in the wider community.

The videos may also prompt help-seeking prior to a crisis point and may encourage help-seeking from cohorts who are traditionally more reluctant to access a counselling service, including young males or people from Tasmania's culturally and linguistically diverse communities.

The videos will be promoted through relevant Tasmanian Government and funded counselling service websites.