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

1. Overview

COTA Tasmania welcomes the opportunity to contribute to this short inquiry. Our submission builds on COTA Tasmania's August 2026 submission to the Sixth Social and Economic Impact Study of Gambling in Tasmania and focuses on the implications of recent policy developments for older Tasmanians.

COTA Tasmania does not suggest that older people are inherently more susceptible to gambling harm, or that gambling should not be recognised as a legitimate recreational activity for people who choose to participate within their means. Older Tasmanians are diverse, and most people who gamble do so without experiencing significant harm.

However, where poker machine harm occurs in later life, its consequences may be particularly serious and difficult to reverse.

Loss of retirement savings may be impossible to recover; fixed or limited incomes can magnify the effect of gambling expenditure; and harm may intersect with bereavement, loneliness, social isolation, disability, cognitive impairment and caring responsibilities. Older people may also experience harm as partners, parents, grandparents or carers of someone who gambles, including through depletion of shared resources and financial elder abuse.

For these reasons, COTA Tasmania's principal concern is not simply whether a measure has been labelled 'harm minimisation'. The relevant tests are whether it is supported by evidence, prevents or reduces harm in practice, remains accessible to people with differing capacities and circumstances, and is independently monitored and publicly accountable.

The recent policy record raises significant concerns. The Government-commissioned Deloitte Access Economics report concluded that mandatory card-based play with loss limits would reduce gambling harm and produce positive social and economic outcomes.

The alternative package announced on 23 January 2026 was developed without consultation with the Tasmanian Liquor and Gaming Commission. The Commission subsequently advised that it had no evidence that the package would minimise harm and was concerned that some measures could have the opposite effect.

That advice should prompt reconsideration before measures with a plausible risk of increasing harm are embedded in Tasmania's gambling system. It also reinforces the need for policy development to be transparent, evidence-led and informed by the independent regulator, public health expertise, community services and people with lived experience.

2. About COTA Tasmania

Council on the Ageing (COTA) Tasmania is the leading body representing the interests of older Tasmanians. COTA Tasmania is an independent, non-partisan, not-for-profit organisation that works to advance the rights, interests and wellbeing of people as they age.

Our work includes policy development and advocacy, community engagement, research, information and education, and contributing the perspectives and lived experience of older Tasmanians to government policy and decision-making.

COTA Tasmania works across issues including financial security, housing, health and aged care, social connection, digital inclusion, transport, ageism and the prevention of abuse and exploitation.

3. Recommendations

1. Reassess mandatory card-based play with default loss limits as a preventive option, having regard to the Government-commissioned Deloitte analysis and the Tasmanian Liquor and Gaming Commission's description of this approach as the 'gold standard' in harm minimisation.
2. Do not proceed with in-venue ATMs or other measures that may increase immediate access to gambling funds unless and until independent evidence demonstrates a net harm-minimisation benefit. Any future arrangements should prevent cumulative access through multiple withdrawal channels.
3. Do not characterise Ticket In Ticket Out technology as a harm-minimisation measure in its own right. Any implementation should incorporate enforceable safeguards, transaction and loading limits, meaningful breaks in play, clear expenditure information and independent testing for unintended increases in spending or financial crime and money-laundering risks, where relevant.
4. Require the Tasmanian Liquor and Gaming Commission to be consulted early and meaningfully on the design of gambling policy, with its advice and the evidence relied upon published except where there is a compelling legal reason for confidentiality.
5. Ensure self-exclusion and facial-recognition measures are treated as additional protections, not substitutes for population-wide prevention. Immediate self-exclusion must be available through simple digital and non-digital pathways, supported by trained staff and effective options for families and carers where decision-making capacity may be impaired.
6. Establish an independent evaluation framework before implementation, with published baselines, measurable targets, implementation timeframes and regular public reporting. Results should be disaggregated by age, geography, disability and socioeconomic circumstances and should include harm to affected others and legacy harm.
7. Embed older people's lived experience in policy design, implementation and evaluation, including older people on fixed incomes, people living with disability or cognitive impairment, rural and regional residents, and older people affected by another person's gambling.

4. Detailed comments

4.1 The Deloitte report strengthens the case for preventive safeguards

The Deloitte Access Economics report is directly relevant because it was commissioned to test claims that the proposed mandatory player card would damage employment and the Tasmanian economy.

Its modelling instead found that reform would lift Gross State Product and net employment relative to the economic baseline, while reducing health and justice costs and increasing labour productivity.

The report estimated that the proposed reforms would reduce total EGM player gambling expenditure by 23 to 46 per cent across the modelled scenarios, with the harm-minimisation features – particularly mandatory loss limits - producing the largest effect for moderate- and high-risk gamblers. In the central scenario, the reform generated an estimated \$230 million increase in Gross State Product (net present value, 2024-2030) and 209 additional jobs.

These findings matter because they undermine a false choice between protecting people and protecting the economy. Money not lost through poker machines does not disappear from Tasmania. It can be redirected to housing, food, energy, health, local retail and other goods and services, while reducing costs borne by families and public services.

COTA Tasmania recognises that mandatory systems require careful design. Privacy, data security, accessibility and arrangements for people with limited digital confidence must be addressed. Those implementation questions do not justify abandoning the preventive function of binding loss limits, particularly when the Government's own commissioned analysis found positive social and economic effects.

4.2 The alternative package was not developed through an adequate evidence process

The Government announced its alternative package on 23 January 2026. It included seven-hour closures for gaming areas in hotels and clubs, TITO, an eventual reduction in the statewide machine cap, immediate self-exclusion using QR codes, mandatory facial recognition for excluded patrons, regional Gaming Care Officers and permission for in-venue ATMs fitted with facial recognition and daily withdrawal limits.

The Tasmanian Liquor and Gaming Commission's advice of 31 March 2026 reveals that it had not been consulted on the package before it was announced. The Commission stated that it had no evidence that the proposed initiatives would minimise harm and was concerned that many could reduce protection and take Tasmania backwards.

This is a significant process concern. The Commission is the independent statutory body charged with investigating gambling impacts, fostering responsible gambling and minimising harm. Excluding it from policy design deprived Government of relevant independent expertise and weakened public confidence that the package was selected on its merits.

COTA Tasmania recommends that the inquiry seek a complete account of the policy process: who originated each measure; what evidence and advice were sought; which agencies, industry bodies and community organisations were consulted; how the Deloitte findings were used; what options were compared; and why the Commission was not engaged before the announcement.

4.3 Some measures may increase rather than reduce harm

The Commission's specific concerns require a response before implementation, not after preventable harm has occurred.

- **In-venue ATMs:** The Commission warned that ready access to additional cash can facilitate chasing losses and that the proposed ATM arrangements, combined with existing EFTPOS access, could triple the cash available to a player. For an older person living on a pension or drawing on finite retirement savings, rapid access to further funds during a gambling session can create harm that is not readily recoverable. Facial recognition attached to an ATM may enforce a withdrawal cap, but it does not transform increased access to cash into harm minimisation.

- **Ticket In Ticket Out:** TITO may improve operational convenience, but convenience is not a harm-minimisation outcome. The Commission advised that faster and easier loading may increase spending and cited evidence of a spending effect of up to 20 per cent. TITO also risks reducing the friction and visibility that handling cash or coins may otherwise provide. If introduced, it should be accompanied by safeguards designed and tested specifically to reduce harm.
- **Longer closure periods:** A seven-hour closure may benefit the relatively small number of people gambling in the early hours, but the Commission noted that many venues do not currently operate for the maximum permitted hours. The practical impact may therefore be limited. Closure times should be consistent across nearby venues to prevent people, including excluded patrons, moving from one venue to another.
- **Machine cap:** A gradual reduction through natural attrition is unobjectionable but, where the existing cap has historically not been reached, it should not be presented as evidence of an immediate reduction in access or harm.

4.4 Self-exclusion and facial recognition are useful but inherently limited

COTA Tasmania supports making self-exclusion faster and easier and recognises that facial recognition can help venues enforce exclusion. These are worthwhile improvements where privacy, accuracy, governance and staff response are sound.

However, they act principally after a person has recognised a problem and entered the exclusion system.

The Commission noted that facial recognition applies only to the relatively small number of people already excluded and is effective only where venue staff act promptly. It is therefore an additional tool for managing existing harm, not a substitute for preventive safeguards applying to all players.

Accessibility is particularly important for older people. A QR-code process must not become the only practical route to immediate self-exclusion. Telephone, face-to-face and paper-based options should remain available, and venue and service staff should be trained to assist people with limited digital confidence, disability, hearing or communication needs.

The framework must also respond appropriately where cognitive impairment or reduced financial decision-making capacity may be present. Families and carers need clear, accessible information about third-party exclusion and other protective pathways, with appropriate safeguards for autonomy, privacy and procedural fairness.

4.5 Older Tasmanians require explicit consideration

Tasmania has the oldest population profile of any Australian state. At the 2021 Census, the median age was 42 years, compared with 38 nationally, and approximately 20.9 per cent of Tasmanians were aged 65 years or over.

COTA Tasmania's 2025 State of the Older Nation analysis provides relevant context. Among Tasmanian respondents aged 50 and over, only 57 per cent felt positive about their long-term financial security and one in five were living in poverty. Poverty was highest among respondents aged 75 and over, at 27 per cent. Fifty-eight per cent lived in regional areas, 21 per cent lived with disability, and loneliness was reported by half of women and 43 per cent of men.

These findings do not establish that older age causes gambling harm. They do show why the consequences and accessibility of safeguards must be assessed in the circumstances of later life.

The same dollar loss can have a profoundly different impact where a person has no realistic opportunity to rebuild savings, is meeting increasing health or care costs, or depends on a fixed income.

Older people must also be visible as affected others. An older partner may lose shared retirement savings; an older parent may repeatedly assist an adult child with gambling debts; grandparents may assume greater financial or caring responsibility; and gambling may intersect with financial elder abuse.

Policy evaluation should measure these impacts, not merely expenditure by the person using the machine.

4.6 Independent evaluation and public accountability are essential

Tasmania's published data show gaming machine player expenditure of approximately \$208.27 million in 2025-26. This was recorded while the number of machines remained below the statewide cap and reinforces why success cannot be inferred from machine numbers or the announcement of new measures alone.

Before the alternative package is implemented, the Government should publish an evaluation framework specifying:

- the harm-minimisation outcome expected from each individual measure and from the package as a whole;
- baseline data and measurable targets, including expenditure, session duration, access to cash, exclusions, breaches, referrals, help-seeking and affected-other harm;
- implementation dates and interim milestones;
- age-disaggregated and regional reporting, including outcomes for people living with disability and financial disadvantage;
- monitoring of unintended consequences, including increased spending, displacement between venues, privacy impacts and financial crime and money-laundering risks, where relevant;
- independent oversight and publication of results at regular intervals; and
- clear decision points at which ineffective or harmful measures will be modified or withdrawn.

The forthcoming Sixth Social and Economic Impact Study will be important, but it should not be used to defer baseline collection or evaluation design. Nor should the existence of a measure be treated as evidence of effectiveness.

5. Conclusion

Recent developments raise serious questions about both the substance of Tasmania's poker machine policy and the process by which it was developed.

The Government's commissioned economic analysis supported mandatory card-based play with loss limits. The independent regulator was not consulted on the replacement package and subsequently warned that it lacked evidence of harm-minimisation benefit and could make some harms worse.

COTA Tasmania urges the inquiry to recommend a return to transparent, evidence-led policy development grounded in public health and consumer protection.

Preventive safeguards should not be displaced by measures that rely predominantly on harm first being recognised or disclosed, and no measure should proceed merely because it is administratively convenient or has been labelled harm minimisation.

For older Tasmanians, the stakes are high.

Losses may be irreversible, digital or service barriers may limit access to assistance, cognitive impairment may complicate financial decision-making, and harm may fall on partners and families as well as the person gambling.

These circumstances must be visible in policy design, implementation and evaluation.

References

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