

**TO: LEGISLATIVE COUNCIL SESSIONAL COMMITTEE GOVERNMENT ADMINISTRATION A  
SUB-COMMITTEE**

**FROM: TASMANIAN LIQUOR and GAMING COMMISSION**

**RE: SHORT INQUIRY INTO RECENT DEVELOPMENTS RELATING TO GOVERNMENT POLICY  
ON POKER MACHINE HARM MINIMISATION**

---

### **Legislation**

The object of the *Gaming Control Act 1993* (Section 2A) is *inter alia* to provide for the licensing, supervision, and control of gambling in Tasmania and in particular, to –

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

The Tasmanian Liquor and Gaming Commission (the Commission) is established to give effect to the Object and its functions are set out at section 125 of the *Act*:

- (a) to regulate and control gaming and wagering to ensure that it is conducted honestly and free from criminal influence and exploitation:
- (ab) to impartially, independently and in the public interest, research, promote, investigate and make recommendations about the impacts of gambling in Tasmania;
- (ac) to foster the responsible service of gambling and minimise the harm from gambling;
- (b) to investigate, and make policy recommendations to the Minister on matters relating to gaming and other forms of wagering.

In undertaking its work over the last five years, the Commission has exercised these statutory functions. It is the only entity/body in the State that has a statutory responsibility to minimise the harm from gambling.

### **Commission Submission**

The attached table provides a record of the Commission's relevant interactions with Government ministers (specifically Messrs Michael Ferguson MP, Nic Street MP, Roger Jaensch MP, Guy Barnett MP and Eric Abetz MP) from December 2021- August 2026. It is not an exhaustive record but illustrates the key processes, decision-making points and relevant documents during that period that relate to the Terms of Reference of this Inquiry.

The Commission does not intend to provide commentary on the substance of the Government policies in this Submission but would point out that the bulk of its views on the agenda to hand has been canvassed already in published reports, media commentary and correspondence released into the public arena through Right to Information processes.

## **Terms of Reference – Specific Comments**

1. The Deloitte Report *Social and Economic Impact of Electronic Gaming Machine (EGM) Reform use in Tasmania* (December 2025) including the Government's response and utilisation of the report

The Commission became aware that the Government was commissioning a review of the impact of the Player Card Gaming reforms when its Terms of Reference were tabled and incorporated into Hansard by Ms Leonie Hiscutt MLC in October 2024.

The Commission was not invited to comment on the Terms of Reference nor was it interviewed by Deloitte in the course of its enquiries. The Commission was not informed of the completion of the review until the announcement by the Treasurer (Eric Abetz MP) of the Deloitte Report (dated December 2025) in January 2026.

The Deloitte Report's findings have never been raised nor discussed with the Commission; and as far as these affect the work of the Commission, no action has been taken on these by Government.

2. The Government's harm minimisation measures announced on 23 January 2026 including:
  - a. their origin, and
  - b. policy work and evidence informing the announced measures

The Commission had no opportunity to assist in shaping the contents of the harm minimisation measures for the Tasmanian gambling sector despite being the only entity/body in the State with a legislative responsibility to ensure that gambling is conducted fairly, free from criminal influence and to protect people being harmed from gambling (as outlined in the Object of the *Gaming Control Act 1993* Section 2A).

The Commission is unaware of the source of these measures but no part of them is the work of the Commission.

Because the Commission was not party to the development of the measures included in the draft Ministerial Direction (January 2026), it cannot say what policy work was undertaken or what evidence was obtained prior to its announcement.

Following the announcement of the Government's package in January 2026, the Commission did provide the Treasurer with various references to multiple studies and research papers up until July 2026. These are outlined in Attachment 2. These were not discussed with the Treasurer.

## ATTACHMENT 2

Productivity Commission 1999, Australia's Gambling Industries

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

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

Gainsbury, S & Balszczyński, A 2016 *Breaks in play: Empowering gamblers through in-game harm minimisation features for electronic gaming machines*

Grea Evidence Centre & International Association of Gaming Regulators 2022 *Forced breaks to reduce the harms of continuous gambling*

Parke, A et al 2019 *Effect of within session breaks in play on gambling behaviour during sustained losses*

International Compliance Association *Money laundering risks in betting and gaming*

Rapid AML/AML TRIX *Money-laundering typologies relating to TITO tickets*

Liquor & Gaming NSW in partnership with Roy Morgan Research published May 2023, *The Impact of Electronic Gaming Machine (EGM) Late Night Play on EGM Player Behaviour*

## ATTACHMENT 1

TASMANIAN LIQUOR and GAMING COMMISSION  
SUBMISSION to the LEGISLATIVE COUNCIL  
SHORT INQUIRY into RECENT DEVELOPMENTS RELATING to GOVERNMENT POLICY on POKER  
MACHINE HARM MINIMISATION POLICIES

---

This submission sets out a record of the Government's actions and the Tasmanian Liquor and Gaming Commission's (the Commission) responses regarding harm minimisation measures relating to electronic gaming machine (EGM) use in Tasmania as they affect the Commission.

| DATE                                       | DOCUMENT/EVENT                                                                                                                                                                                                                                                                                                                                    | SUBSTANCE                                                                                                             |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|
| 21 December 2021 - Ministerial Direction   | Ministerial Direction (No.1) 2021<br><br>Directed the Commission to investigate the extent to which a smart card-based identification system and facial recognition technology (FRT) could minimise gambling harm for EGMS in hotels, clubs and casinos and make recommendations on the most effective method for implementing these technologies |                                                                                                                       |
| 29 June 2022 - Commission Report           | Commission's Report: <i>Investigation of harm minimisation technologies: facial recognition and player card gaming</i> delivered to Minister (Michael Ferguson MP)                                                                                                                                                                                | Report recommended player card gaming (PCG) with mandatory pre-commitment as the strongest harm minimisation measure. |
| 15 September 2022 – Ministerial Direction  | Ministerial Direction (No. 1) 2022<br><br>Commission directed to oversee the development and implementation of a state-wide player card gaming system with pre-commitment for EGMs in hotels, clubs and casinos; and enforce the implementation of such a system through amendment to the Commission's Rules and other technical instruments.     |                                                                                                                       |
| 18 April 2024 – Maxgaming Discovery Report | Commission received the Discovery Report from Maxgaming which described the core features and services for a player card and cashless account-based solution, a high-level implementation plan and cost estimates.                                                                                                                                | The Commission requested approval from Minister to enter the Plan Phase.                                              |

|                                                                           |                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                           |
|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| June 2024                                                                 | Commission received approval from the (acting) Minister to enter the Plan Phase and continue development with Maxgaming                                                                                                                                                                                                                                        |                                                                                                                                                                                           |
| 9 September 2024 – public Consultation Paper                              | Commission released the Player Card and Cashless Gaming Consultation Paper                                                                                                                                                                                                                                                                                     | At the request of the Minister, consultation period was open for 6 weeks, closing on 18 October 2024                                                                                      |
| October 2024 - Deloitte Review commissioned                               | <p>Treasurer Abetz advised the House of Assembly that the Department of State Growth had engaged Deloitte Access Economics to review the impact of the Government's EGM and other hospitality-sector policies.</p> <p>Government's Terms of Reference for Deloitte Review tabled and incorporated into Hansard by Ms Leonie Hiscutt MLC on 29 October 2024</p> | Commission not consulted on this review                                                                                                                                                   |
| 31 October 2024                                                           | Chair met with responsible Minister Roger Jaensch to brief him on the PCG reforms particularly the costs                                                                                                                                                                                                                                                       |                                                                                                                                                                                           |
| 19 November 2024 - PCG deferred                                           | Government announced the PCG scheme had been deferred                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                           |
| 24 January 2025 -Letter from Treasurer to Commission confirming deferral. | Treasurer (Guy Barnett MP) confirmed to the Commission the Government's decision to defer progress on PCG reforms and advised work was underway to develop a package of harm minimisation measures to reduce the harm caused by EGMs and requesting the Commission to defer progression of PCG reforms.                                                        | Commission heard nothing further and was not consulted by any government minister from this point on until communication from Treasurer (Eric Abetz MP) in January 2026 (12 months later) |
| 23 January 2026 – Deloitte Report                                         | Deloitte Report dated December 2025 published on State Growth website and announced by Treasurer                                                                                                                                                                                                                                                               | No input was sought from nor given by the Commission into the review or the findings of the Deloitte Report                                                                               |
| 23 January 2026 – Meeting with Treasurer                                  | Treasurer met with the Chair TLGC and shared a draft Ministerial Direction containing 7 actions intended to provide EGM harm minimisation.                                                                                                                                                                                                                     | Draft had already been approved by Cabinet                                                                                                                                                |

|                                                     |                                                                                                                                                                                                                          |                                                                                                                             |
|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 23 January 2026 (post above meeting)                | Treasurer released media statement containing the content details of the Ministerial Direction he intended to deliver to the Commission                                                                                  |                                                                                                                             |
| 31 March 2026 - Letter from Commission to Treasurer | Commission wrote to Treasurer outlining its concerns about elements of the Ministerial Direction and the failure to address harm minimisation in some actions.                                                           |                                                                                                                             |
| 2 April 2026 – Meeting with Treasurer               | Commission met with the Treasurer and viewed a second version of the draft Direction which was unchanged except for the addition of “with note acceptors” attached to EGMs as part of the TITO technology.               |                                                                                                                             |
| 17 April 2026 – Letter from Commission to Treasurer | The Commission wrote to the Treasurer following this meeting and put in writing its concerns already raised at the above meeting.                                                                                        |                                                                                                                             |
| 17 April 2026                                       | Treasurer provided further information on each measure to assist the Commission with implementation of the suite of measures.                                                                                            |                                                                                                                             |
| 25 May 2026                                         | Treasurer invited discussion on proposed delivery dates for measures in the Government’s response to EGM harm package.                                                                                                   | The next version of the (unchanged) draft Ministerial Direction with applicable dates was provided                          |
| 3 June 2026 – Letter from Commission to Treasurer   | Commission provided a written response to Treasurer on proposed dates                                                                                                                                                    |                                                                                                                             |
| 23 June 2026 – Letter from Treasurer to Commission  | Letter from Treasurer to the Commission attaching Ministerial Direction (No.1 2026) signed 19 June 2026                                                                                                                  | Action 1 – to increase the mandatory closure period in hotels and licensed clubs to seven continuous hours by 1 August 2026 |
| 6 July 2026 – Commission meeting                    | Commission considered Ministerial Direction action 1. It considered research findings regarding late-night high-risk gambling behaviours, inter-state mandatory closure hours and noted that data identified that only 5 | Determined, given the timeframe, to undertake targeted consultation on the mandatory closure period with the five           |

|                                         |                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                  |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                         | <p>(of 87) venues held out-of-hours (liquor) permits which allow them to trade after 2.00 a.m.</p> <p>Also considered the CCTV evidence it holds of an excluded person “venue hopping” as venues closed sequentially.</p>                                                                                                                                             | affected licence holders, Angicare and Maxgaming.                                                                                                                                                                                                                |
| 17 July 2026 – Commission determination | Following consideration of venue licence holders’ responses and the above information, the Commission determined, in compliance with the Ministerial Direction, to apply a standard closure period in line with other jurisdictions, ensuring that players are not able to progress from one venue to another to continue gambling in the early hours of the morning. | TLGC Rules amended (20 July 2026) to give effect to this decision.<br>Stakeholders advised - effective date 1 August 2026 (as per Ministerial Direction)                                                                                                         |
| 24 July 2026                            | The Treasurer advised the Commission of the (negative) feedback he had received from industry on standard closure hours and his inclination to issue a further Ministerial Direction to defer commencement of the amended shutdown arrangements from 1 August 2026 to 1 October 2026.                                                                                 | Treasurer asked the Commission to provide its views on the matter, particularly the consultation process undertaken and the anticipated employment and operational impacts on affected venues.                                                                   |
| 27 July 2026                            | Commission provided a briefing paper to the Treasurer addressing the issues he had raised.                                                                                                                                                                                                                                                                            | Additionally, the Commission outlined the harm minimisation considerations it had taken into account related to late night and early morning gambling risk; the evidence it holds of venue hopping; and addressing the statutory independence of the Commission. |
| 29 July 2026                            | The Treasurer revoked Ministerial Direction (No.1) 2026 and issued a new Ministerial Direction (No. 2) 2026 indicating that standard hours were not to apply to venue closing hours and licence holders could retain flexibility to choose their seven-hour closure period.                                                                                           | Commission determined to further amend TLGC Rules to give effect to Ministerial Direction (No. 2)                                                                                                                                                                |