
Recommendations and findings

Chapter 4 A broad perspective on gambling problems

FINDING 4.1

There is strong evidence that gambling can have adverse health, emotional and financial impacts on many more people than those categorised as ‘problem gamblers’. As is the case in policies addressing harm from alcohol consumption, policy also needs to address these wider impacts.

FINDING 4.2

People playing gaming machines face much greater risks than people who gamble on other forms, particularly lotteries, scratchies and bingo.

Chapter 5 The prevalence of problem gambling

FINDING 5.1

The Commission estimates that there are between 80 000 and 160 000 Australian adults suffering severe problems from their gambling (0.5 to 1.0 per cent of adults). In addition, there are between 230 000 and 350 000 people at moderate risk, who experience lower levels of harm, and who may progress to problem gambling (1.4 to 2.1 per cent of adults).

FINDING 5.2

About 4 per cent of adults play gaming machines weekly or more often. Around 15 per cent of this group would be classified as problem gamblers, with around an additional 15 per cent experiencing moderate risks.

FINDING 5.3

It is estimated that problem gamblers account for around 40 per cent of total gaming machine spending (the average of a range of estimates as high as 60 per cent and, most conservatively, as low as 20 per cent). Moderate risk gamblers account for a further significant share.

FINDING 5.4

While problem gambling prevalence rates for the adult population as a whole have probably fallen, in relation to the more relevant indicators for policy, there is:

- *no reliable indication of a significant decline in the rate of problem gambling among regular EGM players*
- *no evidence that the share of total spending accounted for by problem gamblers has fallen.*

Chapter 6 The benefits of gambling and some implications

FINDING 6.1

The gambling industry makes various contributions of value to local communities, including through the provision of secure, accessible venues.

FINDING 6.2

The large tax concessions on gaming revenue enjoyed by clubs in some jurisdictions (notably New South Wales) cannot be justified on the basis of realised community benefits. There are strong grounds for these concessions to be significantly reduced, though this would require phased implementation to facilitate adjustment by clubs.

FINDING 6.3

While it is not possible to be definitive about the costs and benefits of gambling, the Commission estimates that in 2008-09:

- *the benefits from tax revenue and enjoyment of gambling for recreational gamblers ranged between \$12.1 and \$15.8 billion*
- *the costs to problem gamblers ranged between \$4.7 and \$8.4 billion*
- *the overall net benefits ranged between \$3.7 and \$11.1 billion.*

The net benefits could be much larger if governments reduced the costs through effective prevention and harm minimisation policies.

Even under conservative assumptions, a sustained 10 per cent reduction in the costs associated with problem gambling is estimated to generate benefits to society of around \$450 million a year in 2008-09 prices, and longer-term benefits amounting to several billion dollars. This implies that even harm minimisation measures with modest efficacy may produce worthwhile net benefits so long as they do not also involve disproportionate costs.

Chapter 7 Counselling and treatment support services

Gambling treatment outcome studies report that, irrespective of the type of treatment provided, most clients benefit. Although cognitive behavioural therapy is the approach with most empirical support, no one style of intervention can yet be recommended as best practice.

Outcome and client follow-up data for support services, while limited, show significant decreases in clients' involvement in gambling and their gambling-related problems following treatment.

Building on existing initiatives, governments should:

- ***work to establish stronger formal linkages between gambling counselling services and other health and community services, including by:***
 - ***ensuring that health professionals and community services have information about problem gambling and referral pathways***
 - ***providing a one-item screening test, as part of other mental health diagnostics, for optional use by health professionals and counsellors. Screening should be targeted at high-risk groups, particularly those presenting with anxiety, depression, high drug and alcohol use***
 - ***providing dedicated funding to gambling help services to facilitate formal partnerships with mental health, alcohol and drugs, financial and family services***
- ***promote self-help and brief treatment options, as such interventions can be cost-effective ways of achieving self-recovery of people experiencing problems with gambling***

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- *place greater emphasis on campaigns that (i) dispel common myths about gambling and tell people how to gamble safely (ii) highlight potential future consequences (financial losses, relationship breakdowns) associated with problem gambling and (iii) make the community aware of behaviours indicative of problem gambling, to encourage earlier help-seeking or interventions by family and friends.*

RECOMMENDATION 7.2

Governments should work together to establish a national minimum standard of training for problem gambling counsellors.

RECOMMENDATION 7.3

Governments should ensure that existing funding mechanisms for gambling help services be based on greater contributions from those gambling forms found to involve the greatest social harms:

- *with the gambling types causing greatest harm, as reported by clients presenting to help services, used as the basis for determining these contributions.*

Where funding is also used for prevention and early intervention strategies, contributions should be based on expenditure by gambling type.

RECOMMENDATION 7.4

Governments should cooperate to:

- *create a nationally consistent and publicly available dataset on gambling help services, including measures of their effectiveness*
- *develop national guidelines, outcome measures and datasets for prevention and early intervention measures.*

The collection of data and evaluations of help services and prevention measures should be coordinated through the Commission's proposed national centre for gambling policy research and evaluation (recommendation 18.3) or by another agency with expertise in public health analysis.

Chapter 8 Gambling information and advertising

RECOMMENDATION 8.1

Governments should draw on the Victorian and Queensland models for gambling warnings:

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- *making them conspicuous on machines and in other areas of venues*
 - *using imagery that has been demonstrated to be effective*
 - *highlighting the behaviours that are indicative of problem gambling and the benefits of altering these*
 - *including contact details for help services.*

New warnings should be market-tested for effectiveness prior to their introduction, and their impacts assessed, including by monitoring help-line services before and after implementation. They should be periodically changed to maintain their effect.

RECOMMENDATION 8.2

There should be a capacity for gaming machines to display warnings electronically when the style of play is indicative of significant potential for harm, with:

- *this capability incorporated into all new gaming machines by 2012 and switched on for these machines in 2014*
- *all gaming machines required to have this feature by 2016, with an exemption until 2018 for venues with less than ten machines that also face significant implementation costs relative to revenue*
- *the messages to be displayed and the rules for triggering each message configured in such a way that they could be changed remotely via a monitoring system (including for new machines sold in jurisdictions where existing monitoring systems would not yet be capable of making those changes).*

In the interim, where their monitoring systems are already capable of sending messages to EGMs, jurisdictions should require gaming machines to periodically display simple warnings (unrelated to a gambler's playing style) by 2011.

RECOMMENDATION 8.3

Governments should ensure that gaming machine players are informed about the cost of playing through disclosure of the 'expected' hourly expenditure and the percentage cost of play.

- *Initially, this should be achieved with a sign fixed to all EGMs, showing the percentage cost of play and the expected hourly cost of play on that EGM, based on some customary styles of play.*

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- *By 2011, all new gaming machines should display electronically the cost of playing based on an individual's style of playing, and provide information on the percentage cost of play.*
 - *By 2016, all gaming machines should be required to have this feature, with an exemption until 2018 for venues with less than ten machines that also face significant implementation costs relative to revenue.*
 - *The percentage cost should be calculated as 100 minus the return to player percentage.*

RECOMMENDATION 8.4

The Ministerial Council on Gambling should develop a consistent national approach for regulating gambling-based quizzes, competitions and auctions operated or marketed through television, mobile phones and the internet:

- *those arrangements should not cover gambling or gaming activities already regulated by state and territory governments.*

RECOMMENDATION 8.5

Governments should ensure that gambling suppliers do not provide information to consumers that can create the false impression that future winning numbers can be inferred from past results. This should apply to all gambling suppliers, including government-operated lotteries.

RECOMMENDATION 8.6

The Ministerial Council on Gambling should review the 2010 television industry code of practice to determine whether the current exemptions relating to the promotion of lotteries, lotto, keno and sportsbetting during key children's viewing periods are appropriate.

Chapter 9 School-based education

FINDING 9.1

Little evidence has been collected about the effects of school-based gambling education programs on students' gambling behaviour. However, evaluations of similar programs in alcohol and vehicle safety have found that, while they can raise awareness, they tend to have no, or even adverse, behavioural impacts.

Given the risk of adverse outcomes, governments should not extend or renew school-based gambling education programs without first assessing the impacts of existing programs.

Chapter 10 Pre-commitment strategies

Governments should modify self-exclusion arrangements for clubs, hotels and casinos, so that:

- *while the default option would be an interview-based process, gamblers would also have the option of applying for self-exclusion using a simple form and without delay*
- *gamblers would have the option to apply for a jurisdiction-wide self-exclusion agreement, given effect by requiring that venue staff:*
 - *request identification when issuing cheques for all gamblers claiming major prizes*
 - *match identification against a state-wide database, subject to strict privacy guidelines and only to be used when verifying that parties claiming major prizes are not on the database.*

As in Victoria, prizes won by people shown to be in breach of self-exclusion orders should be forfeited to government revenue.

Governments should ensure that, in any of the self-exclusion programs offered by venues:

- *gamblers have the choice of:*
 - *immediately invoking self-exclusion at the venue (without interview), or*
 - *excluding themselves at a place outside the venue or, to the extent practicable, by phone or internet*
- *subject to evidence and due process, there should be a capacity for family members to make applications for third party exclusions and for nominated venue staff to initiate involuntary exclusions of gamblers on welfare grounds.*

RECOMMENDATION 10.3

Governments should ensure a balance between flexibility and enabling agreements to be binding, by:

- *providing the option for various periods of self-exclusion, with the potential for self-excluded people to revoke their agreements after an appropriate minimum period, subject to evidence of attendance at a counselling service*
- *providing reasonably simple and accessible processes for people with existing agreements to easily extend their self-exclusion periods.*

RECOMMENDATION 10.4

Each state and territory government should implement a jurisdictionally-based full pre-commitment system for gaming machines by 2016, subject to initial development (recommendation 19.1), trialling (recommendation 19.2) and compatible monitoring systems (recommendation 10.6). This system should:

- *provide a means by which players could voluntarily set personally-defined pre-commitments and, at a minimum, a spending limit, without subsequently being able to revoke these in the set period*
- *allow players to see their transaction history*
- *encourage gamblers to play within safe spending and time limits, by specifying default limits*
- *include the option for gamblers to set no limit on their spending as one of the system options, but with periodic checking that this remains their preference*
- *allow occasional gamblers to stake small amounts outside the system*
- *include measures to avoid identity fraud*
- *ensure players' privacy*
- *be simple for gamblers to understand and use*
- *present few obstacles to future innovation in the presentation and design of the system*
- *apply to all gaming machines in all venues in a jurisdiction, with an exemption until 2018 for venues with less than ten machines that also face significant implementation costs relative to revenue.*

The final features of the pre-commitment system should be determined following trials (recommendation 19.2).

In advance of implementation of full pre-commitment, state and territory governments should implement a partial pre-commitment system by 2013, where they have compatible gaming machine monitoring systems and associated gaming machines, or other low cost ways of delivering such pre-commitment.

Such a partial pre-commitment system should allow players to set spending limits in all venues within a jurisdiction, and to see their transaction histories, but with:

- *enrolment in the system being voluntary, so that there would be no requirement that people have a card or identification device*
- *strict protection of players' privacy*
- *no requirement for those who are enrolled to set limits*
- *only those who are enrolled in the system able to earn loyalty points*
- *those who are enrolled able to revoke any limits by playing without a player card or other player identification device*
- *machine-based warnings when limits are reached (and a temporary incapacity to cash in, or earn further, loyalty bonuses)*
- *an exemption for venues with less than ten machines that also face significant implementation costs relative to revenue.*

The system should be:

- *designed to be compatible with the future introduction of full pre-commitment*
- *evaluated in real-time and base line data collected to assess its impacts.*

By 2016, all jurisdictions should have central monitoring or other systems that can deliver full pre-commitment to all venues and can make remote changes to all gaming machines.

Chapter 11 Game features and machine design

Current bet limits imposed by all jurisdictions are set too high to be effective in constraining the spending of problem gamblers, given the speed and intensity of play that a modern gaming machine allows. The maximum bet needs to be low enough to constrain the spend rate of problem gamblers, but not so low as to adversely affect recreational gamblers (who typically bet at quite low levels).

FINDING 11.2

The limits on the maximum amount of cash that can be inserted into gaming machines are set too high. A lower cash input limit would not hinder the preferred betting style of most players, but would act as a brake on high intensity play by preventing players from loading up gaming machines with multiple high denomination notes.

RECOMMENDATION 11.1

Governments should require that by 2012, all new EGMs include the capability of being played at a maximum intensity of \$1 per button push, with this being activated in 2016.

- ***In 2016, all EGMs should be limited to a \$1 bet, with an exemption until 2018 for venues with less than ten machines that also face significant implementation costs relative to revenue.***

RECOMMENDATION 11.2

Governments should restrict to \$20 the amount of cash that a player can insert into a gaming machine note acceptor, with no further cash able to be inserted until the maximum credit on the machine falls below \$20, with implementation:

- ***undertaken without delay in Queensland, where the capacity already exists***
- ***by 2016 in all other jurisdictions using note acceptors***
 - ***with an exemption until 2018 for venues with less than ten machines that also face significant implementation costs relative to revenue***
- ***of alternative approaches that have the same effects for cashless systems as these alternatives develop.***

RECOMMENDATION 11.3

Governments should initiate research on the potential for jackpots to exacerbate the problems some people face with their EGM gambling, with consideration given to the further regulation of jackpots if they pose significant risks to gamblers.

Chapter 12 Venue activities

RECOMMENDATION 12.1

Governments should enhance existing compliance and complaints-handling arrangements by:

- *enabling their gambling regulators, or accredited compliance auditors, to regularly appraise gambling venues' compliance with harm minimisation measures, both mandatory and voluntary, and publicly report their findings*
- *strengthening penalties and disciplines for serious breaches by venues of harm minimisation measures and ensuring their enforcement by gambling regulators*
- *introducing and promoting a mechanism for gamblers and venue staff to make complaints to the relevant gambling regulator about venue conduct contributing to problem gambling*
- *requiring their gambling regulators to publish annually the number and nature of complaints about a venue, the action taken and, where the complaint is substantiated, the name of the venue.*

RECOMMENDATION 12.2

Governments should enhance existing training requirements by:

- *preparing guidelines, including a short list of commonly agreed indicators of problem gambling, to help venue staff identify and, where appropriate, respond to problematic player behaviours*
- *requiring gambling venues to provide staff training on these guidelines and on the process for lodging complaints about a venue.*

RECOMMENDATION 12.3

Governments should prohibit venues from offering inducements that are likely to lead to problem gambling, or are likely to exacerbate existing problems, including offering free alcohol to a patron who is gambling.

Chapter 13 Access to cash and credit

FINDING 13.1

While causality is hard to prove, easy access to ATMs/EFTPOS facilities appears to increase spending by problem gamblers. Problem gamblers use these facilities far more than other gamblers, and say they would prefer to see ATMs removed from venues so they can better control their spending.

FINDING 13.2

Although a ban on ATMs from gaming venues has the potential to assist problem gamblers, it has uncertain benefits and costs, including the risk that problem gamblers would seek to subvert the ban in various ways.

FINDING 13.3

Other than for online gambling, restrictions prohibiting the use of credit cards for gambling are justified.

RECOMMENDATION 13.1

The Victorian Government should, as soon as possible, develop methodologies for evaluating the impending ban of ATMs from gaming venues, including the collection of baseline data. It should then evaluate the effectiveness and outcomes of the ban after its implementation.

RECOMMENDATION 13.2

Governments should modify existing regulations of ATMs/EFTPOS facilities by introducing the following changes in gaming venues:

- ***cash withdrawals from ATMs/EFTPOS facilities should be limited to \$250 a day except for casinos***
- ***ATMs/EFTPOS facilities should be a reasonable distance from the gaming floor, visible to the public and venue staff, yet not to gamblers from the gaming floor***
- ***warning and help messages should be clearly visible on ATMs.***

RECOMMENDATION 13.3

Governments should require venues to pay any gaming machine prize that is above \$300 by cheque or direct credit to the gambler's account, except for prizes won by international visitors in casinos. This should be given effect by:

- ***requiring that, by 2011, all new gaming machines incorporate an internal 'bank' or other feature that is capable of doing this***
- ***activating this feature on machines having the capability by 2014.***

The measure should be implemented for all machines and venues by 2016, with an exemption until 2018 for venues with less than ten machines that also face significant implementation costs relative to revenue.

Governments should require that gaming venues:

- *do not cash out gaming machine prize cheques, except for international visitors at casinos*
- *set limits for self-drawn cheques corresponding to those that apply for withdrawals from ATM/EFTPOS facilities (recommendation 13.2), except for casino patrons.*

Chapter 14 Accessibility of gaming machines

There is no policy rationale for the current prohibition on the Canberra casino from operating EGMs.

- *Permitting the Canberra casino to operate gaming machines, without expanding the number of gaming machines in the ACT and subject to the application of appropriate regulatory harm minimisation measures, would be unlikely to increase accessibility or increase gambling harms.*

Mandatory shutdowns for gaming machines in most jurisdictions are too short and occur at times that make them ineffective as a harm minimisation measure.

Drawing on the Queensland approach, governments should introduce a shutdown period for gaming machines in all hotels and clubs that commences no later than 2 am and is of at least six hours duration. Casinos should be exempt from this measure.

Chapter 15 Online gaming and the Interactive Gambling Act

In consultation with state and territory governments, the Australian Government should amend the Interactive Gambling Act to permit the supply of online poker card games.

Online poker, along with other gambling forms currently exempted from the Interactive Gambling Act, should be subject to a regulatory regime that mandates:

- *strict probity standards*
- *high standards of harm minimisation, including:*
 - *prominently displayed information on account activity, as well as information on problem gambling and links to problem gambling support*
 - *automated warnings of potentially harmful patterns of play*
 - *the ability to pre-commit to a certain level of gambling expenditure, with default settings applied to new accounts, and the ability for gamblers to set no limit on their spending as one of the system options (with periodic checking that this remains their preference)*
 - *the ability to self-exclude.*

The Australian Government should monitor the effectiveness of these harm minimisation measures, as well as the performance of the regulator overseeing the national regulatory regime. The Australian Government should also evaluate whether:

- *the provision of online poker card games should continue to be permitted*
- *liberalisation should be extended to other online gaming forms.*

RECOMMENDATION 15.2

The Australian Government should assess the feasibility and cost effectiveness of:

- *Australia-wide self-exclusion and pre-commitment options for equivalent online providers*
- *the capacity for extending self-exclusion through the payments system or through software solutions selected by problem gamblers*
- *the scope for agreement on international standards on harm minimisation and their enforcement through self-regulatory or other arrangements.*

Chapter 16 Developments in the racing and wagering industries

FINDING 16.1

In the absence of regulation, free-riding by wagering providers would undermine the racing industry and harm consumers of wagering and racing products. The current state-based race fields legislation overcomes this problem. But it poses significant risks for effective competition in wagering, potentially affecting the long-term future of racing and wagering and, more importantly, the punters who ultimately finance both of these industries.

FINDING 16.2

The current approach to setting product fees by racing authorities in New South Wales and Queensland (excluding Greyhounds NSW) is unlikely to result in integration of their industries into a national wagering market. The costs of this will be felt most keenly by the racing industries in those jurisdictions.

FINDING 16.3

There are grounds for state and territory governments to cooperate when setting taxes on wagering revenue, in order to avoid destructive tax competition. Increased levels of competition and the international mobility of corporate bookmakers will increasingly limit the capacity to tax wagering activity effectively.

FINDING 16.4

There are better ways of dealing with the risks of tote odds betting than prohibition, such as co-mingling of totalisator pools. As tote-odds providers generate a high level of direct price competition with totalisators, the grounds for preventing further co-mingling are not strong.

FINDING 16.5

Offering inducements to wager through discounted prices to new customers is not necessarily harmful, and may primarily serve to reduce switching costs between incumbent wagering operators and new entrants, enhancing competition. The risks for problem gamblers should be assessed and, regardless of whether prohibition or managed liberalisation is the appropriate action, a nationally consistent approach would be warranted.

RECOMMENDATION 16.1

The New South Wales and Queensland Governments should work with racing authorities in those states, as soon as possible, to replace their ‘across the board’ turnover fees with more competitively neutral and efficient product fees.

Within three years, the Australian Government should assess whether the race fields legislation frameworks are legally sustainable across all jurisdictions and give rise to competitive outcomes. If either condition is not satisfied, the Government should work with state and territory governments to replace these arrangements with a national statutory scheme, in which there would be a single product fee for each code. This fee should be:

- *universally paid on a gross revenue basis and replace all other product fees currently paid by the wagering industry, but not other funding channels, such as sponsorship of race meetings*
- *set and periodically reviewed by an independent national entity with the object of maximising long-term consumer interests.*

RECOMMENDATION 16.2

The Australian Government should request that the Australian Competition and Consumer Commission examine and report publicly on any adverse implications for competition associated with the ownership arrangements for Sky Channel.

RECOMMENDATION 16.3

The impact of credit betting should be examined in further detail by either the regulator overseeing the national regulatory regime (recommendation 15.1) or the national gambling research body (recommendation 18.3). In the interim, advertising credit betting facilities should be prohibited, and credit betting should not be extended to TABs.

RECOMMENDATION 16.4

TAB retail exclusivity should not be renewed.

Chapter 17 Regulatory processes and institutions

FINDING 17.1

Despite their name, gaming machine national standards are not really national standards, and the processes for their development and alteration are cumbersome and unnecessarily costly to industry.

FINDING 17.2

There is insufficient guidance given to gaming machine manufacturers about whether or not particular gaming machine features are likely to obtain regulatory approval. While complete certainty is unattainable, greater clarity of the expectations of jurisdictions would reduce costs for manufacturers and venues.

RECOMMENDATION 17.1

Each jurisdiction should ensure that its gambling regulator has:

- ***statutory independence from government***
- ***regulatory control over all forms of gambling within that jurisdiction***
- ***a charter that emphasises the public interest, and explicitly includes consumer protection and harm minimisation.***

RECOMMENDATION 17.2

The relevant minister for gambling in each jurisdiction should have an explicit responsibility for harm minimisation.

RECOMMENDATION 17.3

Governments should strengthen consultation processes and incorporate the views of stakeholders, including gambling providers, manufacturers and consumer representatives, into policy development processes. Governments should clearly specify appropriate mechanisms for providing input, and set minimum consultation timeframes that reflect the importance of the issue. Details of consultations should be made publicly available.

RECOMMENDATION 17.4

Given the potential for adverse social impacts and costs to business, governments should routinely undertake regulatory impact assessments for all major regulatory proposals for gambling, and make them publicly available at the time policy decisions are announced.

RECOMMENDATION 17.5

Governments should reform gaming machine national standards by requiring consistency, unless the costs of variations can be justified by likely consumer benefits.

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- *Variations should be based on legitimate harm minimisation criteria and should take into account the costs that such differences impose on other jurisdictions, manufacturers and venues.*
 - *Governments should jointly investigate the scope to rationalise current arrangements for accreditation and testing of gaming machines, to remove any unnecessary duplication of effort and cost.*

RECOMMENDATION 17.6

Regulators should ensure that all of their requirements for gaming machines and games are specified clearly and made available publicly:

- *Where new developments are judged to be unacceptable, clear reasons should be given so as to provide guidance to the industry and inform the community.*

Chapter 18 Gambling policy research and evaluation

RECOMMENDATION 18.1

All jurisdictions should improve the usefulness and transparency of gambling survey evidence by:

- *conducting prevalence surveys using a set of core questions that are common across jurisdictions*
- *ensuring that surveys meet all relevant National Health and Medical Research Council standards and guidelines, so as not to limit their use by researchers*
- *depositing all survey data into a public domain archive, subject to conditions necessary to manage confidentiality risks and other concerns about data misuse.*

RECOMMENDATION 18.2

Governments should publicly provide timely data on:

- *expenditure and tax revenue for each gambling form by type of venue*
- *gaming machine numbers by venue type (hotels, clubs and casinos)*
- *self-exclusion information, such as the number of agreements for each year that are current, have lapsed, been revoked, or breached.*

RECOMMENDATION 18.3

To place gambling research on a sound footing nationally, Gambling Research Australia should be replaced with a national centre for gambling policy research and evaluation. The centre should initially be funded by the Australian Government and:

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- *have a charter requiring it to oversee research of direct policy relevance*
 - *have a capability to perform and initiate such research itself, as well as respond to requests by the Australian Government*
 - *have the capacity to outsource projects to external researchers and research institutions where appropriate*
 - *have an advisory panel, with representation from the community, industry, other experts and all governments*
 - *coordinate evaluations, surveys and reviews nationally*
 - *collaborate with drug, alcohol and other public health research units to broaden the expertise and disciplines brought to bear on gambling*
 - *establish guidelines, methodologies and processes for research and evaluations undertaken by governments.*

Chapter 19 Implementation issues and transitions

RECOMMENDATION 19.1

All governments should commence work as soon as possible to specify the design features, common standards and protocols for gaming machines and central monitoring systems that would:

- (a) support a future full pre-commitment system (recommendation 10.4), including the exact design of a prototype to be trialled (recommendation 19.2)*
- (b) allow governments to quickly and remotely set and change bet limits, cash inputs, player information displays, dynamic warnings, pre-commitment options and other key machine parameters for all EGMs in a jurisdiction*
- (c) permit machine manufacturers to sell machines during the transition period that would be compliant with (a) and (b) when these features were ‘switched on’*
- (d) not hinder competition between rival providers of games, loyalty schemes and monitoring services.*

RECOMMENDATION 19.2

The Australian Government should enter into negotiations with a state or territory government to sponsor a full-scale regional trial or trials of a full pre-commitment regime (recommendation 10.4), with trialling to commence by 2013.

Trialling should:

- *test the design features of full pre-commitment for possible modification*

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- *substantiate that full pre-commitment has sufficient advantages over partial pre-commitment to justify proceeding with its implementation in all jurisdictions.*

RECOMMENDATION 19.3

The level of all monetary amounts specified in the Commission's recommendations should be assessed periodically, with the potential to raise these with inflation.

RECOMMENDATION 19.4

By 2020, governments should evaluate the key harm minimisation measures to assess their effectiveness, and whether any need to be modified or removed.

RECOMMENDATION 19.5

If there is little progress in achieving the design changes to gaming machines and networks necessary for effective harm minimisation, the Australian Government should consider exercising the option under the corporations power of the Constitution to develop and implement these changes Australia-wide.