



AUSTRALIAN BANKERS' ASSOCIATION INC.

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Mr Gary Banks
Chairman
Productivity Commission
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Dear Mr Banks,

Gambling Inquiry

The Australian Bankers' Association (ABA) welcomes the opportunity to provide comments on the Productivity Commission's inquiry into gambling and the *Gambling Issues Paper*.

1. Opening remarks

The ABA acknowledges the Federal Government's commitment to address problem gambling as a social policy concern. We support encouraging socially responsible programs and effective and workable strategies for addressing problem gambling. A national approach to developing harm minimisation strategies which promote responsible gambling should be adopted through a shared response from governments, business (in particular the gambling and hotels, pubs and clubs industries which directly benefit from electronic gaming machine (EGM) revenues) and the community.

The ABA recognises that the Productivity Commission's inquiry Terms of Reference do not explicitly include consideration of access to cash in gaming venues. However, the Ministerial media release announcing the Productivity Commission's inquiry mentions measures introduced by State governments to limit access to cash in gaming venues as well as the Ministerial Council on Gambling's report a *National Snapshot of Harm Minimisation Strategies in Australia*, which outlines restrictions on access to cash as a harm minimisation strategy.

Even though around only 1% of ATMs located in gaming venues throughout Australia are bank branded, we have been liaising with Federal and State governments on identifying workable strategies for addressing concerns with problem gambling. Therefore, we limit our comments to the following matters: research, access to cash, harm minimisation strategies, self-exclusion schemes and telephone and Internet gambling.

2. Specific comments

2.1 Research on problem gambling

The ABA believes that it is necessary to ensure that policy implemented to address problem gambling is evidence-based. While research indicates that around 300,000 Australians, or approximately 2% of Australia's adult population, are "problem gamblers", it has been a decade since the Productivity Commission released its research into gambling¹.

The ABA supports the Productivity Commission's inquiry into gambling, with a view to updating its research. The Federal Government should conduct thorough analysis of problem gambling in Australia in relation to consumer interests (including early intervention and prevention, problem gambling management, consumer protection and gambling-related issues) and other impacts (including dependence on revenue from gambling taxation, different regulatory approaches across States and Territories). Furthermore, consideration should be given to understanding the following issues: what are the drivers of problem gambling, what are the early signs and symptoms of a gambling-related problem, what measures deliver improved outcomes in prevention and rehabilitation, and what targeted measures will have a real impact on addressing problem gambling.

The ABA notes that the Council of Australian Governments (COAG) has determined that current research into problem gambling is required to assist in identifying meaningful strategies to address problem gambling.

The ABA believes that it is important for public policy developments to be accompanied by sound research to determine if changes to current cash restrictions should be made, the extent of any changes (including technical capabilities, costs and timing implications, and interaction with harm minimisation strategies), and the effectiveness of various measures to mitigate problem gambling. Any changes should be thoroughly examined in terms of the costs and the benefits for the community.

2.2 Access to cash in gaming venues

2.2.1 Overview of ATMs and EFTPOS facilities in Australia

The processing of an automatic teller machine (ATM) or EFTPOS transaction can involve at least four parties:

- the customer (card holder);
- the institution that maintains the account and issues the card to the card holder (card issuer);
- the institution that acquires the transaction (acquirer); and
- the owner/operator of the ATM (ATM deployer) or operator of the EFTPOS facility (merchant).

¹ *Australia's Gambling Industries*. Report No. 10. 26 November 1999.
<http://www.pc.gov.au/projects/inquiry/gambling/docs/finalreport>

Over 2.6 billion debit transactions were conducted across the ATM and EFTPOS networks over the year to December 2008 – that means currently each month around 72 million ATM transactions and 146 million EFTPOS transactions are conducted across the payments system in Australia².

Every transaction across the payments system carries with it a number of electronic messages between the device (ATM or EFTPOS facility), the acquirer and the card issuer to determine whether the transaction can be authorised and the card holder can withdraw the cash or make the purchase. The maximum daily withdrawal limit applies to the debit card regardless of what device is used to access the funds, i.e. cash withdrawal at an ATM or purchase made or cash out at a merchant using an EFTPOS facility.

2.2.2 Measures already implemented by banks to restrict access to cash

Banks offer convenient and accessible cash to their customers in more than 11,800 ATMs and over 517,800 EFTPOS facilities throughout Australia. The ABA and member banks also offer a variety of financial literacy resources and financial capability education programs to help consumers effectively manage and take control of their own financial affairs.

Banks have readily complied with existing regulations affecting ATMs in gaming venues, including:

- limiting the amount of cash that can be withdrawn per transaction from ATMs in gaming venues³;
- ensuring ATMs are not placed within gaming areas at casinos and gaming venues; and
- ensuring that cash advances on credit cards (against credit balances) are not available from ATMs at gaming venues.

In addition to these regulatory measures, banks offer customers further options to manage their finances and expenditure, including upon request, varying their maximum daily withdrawal limit (where possible).

In this instance, a customer (card holder) would contact their bank and request that the maximum daily withdrawal limit on their debit card be reduced. Depending on the type of bank account, the bank would respond to the request by implementing a maximum daily withdrawal limit that differs from the standard limit. However, it should be noted that the new maximum daily withdrawal limit would apply across all points of access (ATM, EFTPOS and cash facilities), not just ATMs in gaming venues.

Furthermore, a bank would not take this action without an explicit instruction from their customer requesting that the maximum daily withdrawal limit on their debit card be reduced, for example, to assist them manage their gambling expenditure.

² RBA Bulletin Table C04 contains statistics for use of debit cards. Debit card statistics do not include use of credit cards, cheques or direct entry payments. <http://www.rba.gov.au/Statistics/Bulletin/C04hist.xls>

³ Victoria, South Australia and Northern Territory have limited the amount of cash that can be withdrawn from ATMs in gaming venues to \$200 per transaction per debit card. Tasmania has prohibited ATMs in gaming venues. Western Australia has prohibited electronic gaming machines (EGMs), except for in the casino. The ABA notes that Victoria has recently legislated that ATMs in gaming venues must not enable a person to withdraw from one debit or credit card more than \$400 in total in a period of 24 hours. The legislative change is due to take effect in 2010. Victoria has also announced that it will prohibit ATMs in gaming venues. This change is due to take effect in 2012. *Victoria to remove ATMs from gaming venues*. Victorian Premier Media Release. 13 March 2008. <http://www.legislation.vic.gov.au/>

2.2.3 ATMs in gaming venues

As at December 2008, there are 27,081 ATMs in Australia, with bank branded ATMs accounting for around 46% of ATMs. Non-bank ATMs make up a significant and important part of the overall ATM network. The ABA understands that around 25% of ATMs in Australia are located in a gaming venue⁴. As at March 2009, 84 bank branded ATMs are located at gaming venues, which represents around 1% of ATMs in gaming venues throughout Australia. Only a small number of ATMs located in a gaming venue are bank branded.

The significantly vast majority of ATMs in gaming venues are not operated by banks or other financial institutions, but rather operated by "third party ATM deployers". Third party ATM deployers are not financial institutions and do not have card holders of their own, but instead their business model relies on arrangements with acquirers to provide them with a flow of card holders and transactions. Third party ATM deployers are not supervised or regulated as banks or other financial institutions under the various statutes that apply to those carrying on a banking business or those providing financial services.

In March 2009, ATM reforms required by the Reserve Bank of Australia (RBA) resulted in ATM deployers being able to directly charge customers a fee for the use of their ATM – that means ATM deployers are able to charge a fee and recoup costs associated with maintaining their ATMs. It also means that if further cash restrictions are introduced to ATMs in gaming venues, the costs of these restrictions can be contained to those ATMs and those customers that choose to use ATMs in gaming venues, rather than being spread across the entire payments network and to all banks, other financial institutions, card issuers and all their customers.

2.2.4 EFTPOS facilities in gaming venues

As at December 2008, there are 669,600 EFTPOS terminals in Australia, with banks owning around 80% of EFTPOS facilities⁵. The ABA understands there are around 6,000 gambling venues throughout Australia, and it is assumed that each venue would have at least one merchant operating an EFTPOS facility⁶.

The EFTPOS network is a much simpler network than the ATM network. Due to technology and network limitations, it is not currently possible to limit access at certain merchants while enabling full access to other merchants. However, merchants can decide not to accept certain cards through their facility or choose not to accept to give cash out to customers. Obviously, merchants can decide not to have an EFTPOS facility in their venue at all.

⁴ *Submission to inquiry into Poker Machine Harm Minimisation Bill 2008*. ATM Industry Reference Group. 8 August 2008. http://www.aph.gov.au/senate/committee/clac_ctte/poker_machine_harm_minimisation/submissions/sub07.pdf The ABA notes that the Australian Prudential Regulation Authority (APRA) collects data on points of presence, including ATMs, for authorised deposit-taking institutions (banks, credit unions and building societies). The Australian Payments Clearing Association (APCA) collects data on all ATMs, but does not disaggregate by location.

⁵ ATM and EFTPOS Statistics. Australian Payments Clearing Association. http://www.apca.com.au/Public/apca01_live.nsf/WebPageDisplay/Stats_Terminals

⁶ Statistics for gambling venues and gambling services are available from the Office of Economic and Statistical Research (OESR), the Australian Bureau of Statistics (ABS), and the various State offices of gaming regulation.

2.2.5 ABA position on access to cash

The ABA notes that State governments have variously introduced statutory restrictions on access to cash in gaming venues. In addition, recently the Senate Community Affairs Committee inquiry into the *Poker Machine Harm Minimisation Bill 2008* ("Fielding Bill") and the *ATMs and Cash Facilities in Licensed Venues Bill 2008* ("Xenophon Bill") gave consideration to introducing further cash restrictions. The ABA would be pleased to provide additional information about the specific impacts of the provisions contained in the Fielding Bill and Xenophon Bill upon request.

The ABA is concerned that measures aimed at assisting problem gamblers by prohibiting or further restricting access to cash in gaming venues could adversely impact all consumers and providers of ATMs and EFTPOS facilities. Due to technology and systems limitations, it is not currently possible to introduce a withdrawal limit that applies to a particular debit card and varies across devices.

Imposing a limit on cash withdrawals from ATMs in gaming venues that differs from the withdrawal limit from all ATMs is not simple. A system would need to be designed that either introduced new ATM hardware and software ('ATM level' option) or changed the bilateral arrangements between every card issuer across the electronic payments network ('card issuer' level option).

A 'card issuer level' option would impose significant costs on all card issuers and all customers and have significant ramifications and complexities for the payments system (undermining the cost-effectiveness and efficiency of the network). A technology solution involving flagging of transactions by ATM acquirers and tracking, monitoring and processing in real time transactions across the payments system by card issuers would be required. New APCA rules to enable identification of the relevant ATMs and wide system and network testing would also be necessary⁷.

An 'ATM level' option would not involve card issuers, but would require implementation of a limit management system at the ATM level. Changes to ATM hardware and software and storage of data would be required. It is also likely that control of transactions by ATM acquirers would be required.

There are a number of practical, technical, administrative and legal issues that would need to be addressed, such as transaction parameters, network interoperability, inconsistent software, processing systems and technology platforms, restricted hardware functionality, difficulties with ongoing monitoring, reduced efficiencies across the network, increased costs for all users, increased confusion for all users, subjectivity with withdrawal limits, problems with definitions (such as venue, day, operate), and problems with APCA rules and APCA membership. The ABA would be pleased to provide detailed comments on the implications of implementing further cash restrictions on ATMs and EFTPOS facilities upon request.

⁷ Based on an initial assessment of implementing further cash restrictions via a 'card issuer level' solution, costs for software development alone are estimated at between \$2.2-2.9 million for every card issuer. In addition, other technical development, network testing, bilateral testing, operational implementation, possible ATM and EFTPOS hardware and software upgrades, ongoing administration of new processing systems, customer communication and ongoing support services are unable to be quantified. However, it is possible these additional costs could range from \$600,000-\$1.3 million and communication costs could range from \$1-6 million for every card issuer. It is estimated that there are around 200 domestic card issuers. Therefore, an initial assessment of the total costs could be in the range of between \$3.8 to \$10.2 million per card issuer – that means a cost of between \$760 million to \$2 billion dollars across the banking and finance industry, and other card issuers. This does not include international card issuers.

The ABA believes that capping the amount of cash that can be withdrawn over a day from ATMs and EFTPOS facilities in gaming venues is not an effective measure in addressing problem gambling and therefore further cash restrictions should not be introduced. However, if further cash restrictions are introduced, restrictions should be imposed on the licensee of the gaming venue to ensure that the operator of the device – that is, the ATM deployer or the merchant – implements the regulation. The responsibility for implementing further restrictions should not be imposed on banks, other financial institutions or card issuers.

This approach recognises that it is impractical for banks, other financial institutions and card issuers to implement further cash restrictions and that it is appropriate for licensees of gaming venues to be responsible for limiting access to cash via cash facilities in their venues and for the ATM deployers that profit from ATMs in gaming venues to be responsible for implementing any further measures.

The ABA notes that initiatives overseas to restrict access to cash in gaming venues have been delivered through a combination of self-exclusion and ATM technology, whereby transactions may be blocked at the venue following disclosure of the card number and limit by the card holder. Furthermore, initiatives overseas have also taken into consideration access to cash within the community.

The ABA believes:

- Further restrictions on access to cash from ATMs and EFTPOS facilities are not feasible or workable. Such restrictions would be costly to implement and would be likely to have a substantial impact on the broader payments system and, consequently, all users of the electronic payments network. Obligations should acknowledge limitations (cost, timing and technical capabilities) with technology, functionality and interoperability of bank and non-bank branded ATMs and EFTPOS facilities. Any proposed changes to the payments system must involve the RBA, APCA and debit and credit card schemes.
- Further restrictions on access to cash in gaming venues should avoid imposing costs on banks, and other financial institutions, card issuers and their customers; requiring banks to determine how bank customers access their money; limiting access to cash for non-gambling businesses and patrons; and, restricting access to cash services, especially in regional and remote locations.
- Further restrictions on access to cash in gaming venues should identify workable and meaningful strategies and implement these strategies in a coordinated manner and on a national basis.
- Further restrictions on access to cash in gaming venues should not be implemented in a manner that would affect all banks, other financial institutions and card issuers. Obligations should be imposed on the licensee of the gaming venue to ensure that the operator of the device – that is, the ATM deployer or the merchant – have in place technologies, protocols or processes to restrict access to cash, including:
 - *ATMs*: To ensure that implementation costs, technology changes and unintended consequences are minimised and all ATMs are subject to the same limits, any further regulations should prohibit ATMs from gaming venues or limit access to cash, whereby the deployers of ATMs in these venues are able to implement a technology solution to restrict access to cash at the 'ATM level'.

- *EFTPOS*: To ensure that implementation costs, technology changes and unintended consequences are minimised and efficiencies in the EFTPOS network are not compromised, any further regulations should require the licensee of the gaming venue to implement protocols, whereby their staff do not provide cash to their patrons at the 'EFTPOS facility level'.
- Further restrictions on access to cash in gaming venues should take into consideration the social and economic ramifications, including the potential impact on all patrons and businesses of gaming venues and the impact on all customers using the electronic payments network, especially in remote, rural and regional locations.
- The gambling industry, licensees of gaming venues and deployers of ATMs in these venues should be called upon to take responsible steps in relation to the use of their facilities and services. Obligations should be imposed on licensees of gaming venues to ensure the effectiveness of proposed strategies.

The ABA believes that the imposition of further restrictions on access to cash in gaming venues should not impose a cash limit per debit card per day that in effect transfers costs from the sectors that benefit from gambling revenues to banks, other financial institutions and, ultimately, all their customers. Restrictions on access to cash in gaming venues are a gambling industry and ATM deployer responsibility and not an issue for the banking industry and payments system, which is supervised and regulated by the RBA. We suggest that the feasibility of introducing a technology solution at the 'ATM level' needs to be assessed in discussion with representatives from the gambling industry, the ATM Industry Reference Group, and representatives from other ATM deployers that operate ATMs in gaming venues.

2.3 Harm minimisation strategies

Strategies with the greatest likelihood of having a real impact should be the focus of a national strategy to address problem gambling. Responsible gambling programs and harm minimisation measures that consider cognitive and behavioural factors contributing to problem gambling have proven to be the most effective. In addition to comprehensive education materials, gambling counselling services, gambling support programs, and self-exclusion schemes, a preferred approach is to focus on pre-commitment technologies or a stored value system to help problem gamblers set their limits, where the gaming venue issues a card permitting access to various gaming activities.

This approach has a number of advantages, including:

- Addresses concerns with access to cash and 'cashless' transfer of value by not relying on the method of transaction or payments system.
- Provides problem gamblers with the tools to help them set their limits, but does not restrict access to cash for the vast majority of the adult population who are responsible gamblers or users of cash for non-gambling purposes or patrons of commercial businesses within the gaming venue.
- Allows the gaming venue to take part in a harm minimisation measure to address problem gambling. (This proposed approach is similar to a strategy for addressing problem drinking, where a licensee of a venue has a responsible service of alcohol obligation and is not permitted to serve someone alcohol that is identified as intoxicated).

Therefore, harm minimisation strategies for problem gamblers should adopt a multi-faceted approach, including:

- Education materials and confidential financial and problem gambling counselling services, provided by governments; and
- Self-exclusion schemes, pre-commitment technologies and store value systems, provided by the gambling industry; and
- Gambling support programs, provided by the gambling industry and via the community sector; and
- Demand reduction or supply control initiatives, including removing or restricting access to EGMs in these venues (such as caps on EGMs, restrictions on spin rates and note acceptors), implemented by the gambling industry and governments.

The ABA believes harm minimisation strategies that consider cognitive and behavioural factors and focus on the supply and demand of gambling services have a greater positive impact in stopping the further expansion of gambling or minimising the incidence of problem gambling. Harm minimisation strategies should form the basis of a national strategy to address problem gambling.

2.4 Self-exclusion schemes

A bank's duty of confidentiality and various legal obligations, including privacy laws and the Electronic Funds Transfer (EFT) Code, means unless any exception to the rule is satisfied, it is unable to provide information to a third party about a customer, including their debit card number and other bank account details.

Currently, hotels, pubs and clubs operating EGMs have self-exclusion schemes in place to allow patrons to exclude themselves from nominated areas of a venue or the entire venue. Self-exclusion takes the form of a contract between the individual and the gambling provider, with the individual, not the provider, being liable for any violation of the contract.

A gaming venue must enter an arrangement with a body (i.e. Clubs NSW and AHA NSW) approved by the Minister (i.e. Minister for Gaming (NSW)) to establish and conduct a self-exclusion scheme. This arrangement contains details of minimum requirements for establishing and conducting a self-exclusion scheme. Individuals are required to sign a 'Deed of Self Exclusion' to become self excluded. The ABA understands there is no cost for individuals who nominate to participate in the scheme.

It may be possible to extend existing self-exclusion schemes to include the ability for individuals to exclude themselves from certain services or facilities within the gaming venue (i.e. ATM). For example, a process might be possible, such as:

- The individual completes the Deed of Self Exclusion, which includes a section requesting the disclosure of information about their debit card, i.e. card number.
- The body administering the self-exclusion scheme executes the deed, and in doing so provides this information to the deployer of the ATM(s) in their venue(s).
- The ATM deployer implements a software restriction at the ATM level, which means that the individual is unable to use their debit card in an ATM in a gaming venue where the self-exclusion scheme applies, but would still be able to use their debit card in ATM, EFTPOS and cash facilities elsewhere.

- The individual would need to nominate to the approved body to participate in the self-exclusion scheme. The individual would also need to be responsible for complying with being self-excluded, i.e. provide relevant details for their debit card, and potentially more than one debit card, as well as be aware of how their banking, and potentially the banking of others, i.e. spouse, may be impacted by their participation in the self-exclusion scheme.
- The ATM deployer would need to have the technology capability to be able to implement a software restriction to facilitate the voluntary self-exclusion schemes.

The ABA notes that this option would require substantial thinking through before it could be determined to be a possibility. For example, there are many complex practical, technical, administrative and legal issues that would need to be clarified and resolved, such as:

- *Protections:* Data would need to be properly protected. In addition, implications of consent being provided by the card holder regarding a transaction would need to be carefully considered in terms of privacy laws and the EFT Code.
- *Data management:* ATM deployers would need to develop a sophisticated software operating system for their ATMs, to ensure that data capture processes are maintained and updated as necessary. Administering bodies and/or gaming venues and/or ATM deployers would need to also maintain a list of excluded debit cards. Transferability of self exclusions if/when an ATM at a venue changes provider would need to be considered.
- *Authentication:* Card holders would need to be verified, to ensure that the individual requesting to be self-excluded has restrictions placed on their debit card, and not another individual, i.e. spouse (where possible). Multiple accounts and/or multiple cards would need to be considered.
- *Staff training:* Gaming venues would need to provide their staff with adequate training, to ensure that the self-exclusion scheme is administered effectively.
- *Liability/indemnity:* Card holders would need to understand their rights and responsibilities in relation to providing consent to disclose information to a third party. Gaming venues and ATM deployers would need to also understand their obligations and protections. In addition, dispute resolution processes would need to be considered.

The ABA understands that similar approaches are adopted in the United States, Canada and the United Kingdom. However, it should be noted that these voluntary self-exclusion schemes are administered through ATM networks that are quite different to Australia.

The ABA suggests that further consideration be given to harm minimisation strategies, including self-exclusion schemes. We suggest that the feasibility of this option needs to be assessed in discussion with representatives from the gambling industry, the ATM Industry Reference Group, and representatives from other ATM deployers that operate ATMs in gaming venues.

2.5 Telephone and Internet gambling

The ABA believes that it is necessary to ensure that measures to assist problem gamblers also address the growing incidence of telephone and Internet gambling, including unlicensed and extra-jurisdictional gambling services.

The ABA supports the Federal Government conducting thorough analysis of telephone and Internet gambling in Australia and overseas gambling services used by Australians in relation to consumer interests (including fairness, protections) and other impacts (including technology and operations, licensing, supervision, investigation, enforcement, money laundering, taxation). Furthermore, consideration should be given to understanding the following issues: what assurances are provided to the player, what registration, identification and security procedures are adopted by the provider, how is personal and financial information stored, what payment processes are adopted, what payout processes are adopted, and what targeted measures will have a real impact on addressing problem gambling.

The ABA believes that it is important to ensure that harm minimisation measures and consumer protections translate from physical gambling to the 'virtual' gambling environment. We suggest that the feasibility of technology restrictions needs to be assessed in discussion with representatives from the gambling industry, credit card schemes and Internet and telecommunications industry.

3. Concluding remarks

Access to cash is not simply a matter for consideration in the context of problem gambling. With this in mind, it is our view that further cash restrictions should not be introduced. However, if further restrictions on ATMs and EFTPOS facilities are deemed appropriate and necessary, regulations must:

- Impose obligations on licensees of gaming venues to ensure the effectiveness of proposed strategies and to ensure that restrictions are implemented on the cash facilities within their venue.
- Apply restrictions on access to cash from ATMs on the ATM deployer via an 'ATM level' solution, and on access to cash from EFTPOS facilities on the merchant. This would enable ATM deployers to develop a technology solution as suitable to their business model without imposing costs on all banks, other financial institutions, card issuers and all their customers. It would also enable merchants to implement a protocol that only permits purchases via EFTPOS facilities and therefore enables licensees of gaming venues to control access to cash in their venues.
- Be applied in a flexible manner by requiring either the implementation of a cash restriction via an 'ATM level' solution, or where an ATM level solution is unable to be implemented, the removal of ATMs from gaming venues.
- Be applied in a balanced manner that recognises the broader social and economic implications of further restricting access to cash, including the costs, inconvenience and adverse consequences for non-gambling patrons, businesses and the wider community. In particular, special consideration should be given to the impact on remote, rural and regional communities that have limited numbers of ATMs and EFTPOS facilities.
- Be applied nationally to avoid a haphazard and complicated response that is difficult to implement and costly for all users of the electronic payments network.

This approach has a number of advantages, including:

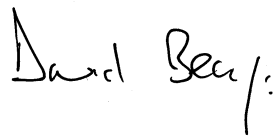
- Recognises that it is unreasonable and impractical for banks, other financial institutions and card issuers to implement further cash restrictions and that it is appropriate for licensees of gaming venues to be responsible for limiting access to cash via cash facilities in their venues and for the ATM deployers that profit from ATMs in gaming venues to be responsible for implementing any further measures.
- Enables the ATM industry to develop a technically feasible response and would not impose costs on banks, other financial institutions, card issuers and all their customers, or interfere with the payments system. It will also provide a practical approach to restricting access to cash from EFTPOS facilities and recognise that remote, rural and regional communities could be disproportionately impacted by further cash restrictions.
- Properly targets measures at the detriment and properly implements remedies without imposing undue costs across the community.

While the ABA supports workable and meaningful strategies for addressing the incidence of problem gambling, it is our strong view that restrictions on access to cash in gaming venues are a gaming venue licensee and ATM deployer issue. Further cash restrictions should not be implemented in a manner that would compromise the efficacy of the payments system or impose costs on banks, other financial institutions, card issuers and all their customers.

Harm minimisation strategies should be developed to allow customers access to their funds, but focus on providing problem gamblers with the tools to manage their own gambling expenditure, including education materials, gambling counselling services, gambling support programs, self-exclusion schemes and pre-commitment technologies.

If you have any queries regarding the issues raised in this submission, please contact me or Diane Tate, Director, Financial Services, Corporations, Community on (02) 8298 0410: dtate@bankers.asn.au.

Yours sincerely



David Bell