



Thursday, 17 December 2009

By email: [gambling@pc.gov.au](mailto:gambling@pc.gov.au)

By mail: Gambling Inquiry  
Productivity Commission  
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MELBOURNE VIC 8003

### **Further submission by Australian Hotels Association (Victoria)**

Having considered the Productivity Commission's draft report of its inquiry into gambling issued on October 2009, the Australian Hotels Association (Victoria) seeks to make a further submission adding to our earlier submission of 31 March 2009 (no. 86).

The presentations by AHA National and the Australasian Gaming Council, of which AHA (Vic) is a member, to the Commission at the recent public hearings reflect the views of AHA (Vic) in response to the Commission's draft report.

In the Victorian context, we are both surprised and disappointed that the Commission appears to have minimal regard for the extensive range of problem gambling harm minimisation initiatives implemented by the Victorian Government since 1999 and the contribution that they have made to reducing the reported prevalence of problem gambling in Victoria.

The range of further interventions proposed by the Commission in the draft report are in our view unwarranted and will simply serve to inconvenience occasional "recreational" gamblers, whilst at best further stigmatising those who do experience problems with gaming without positively assisting them.

Draft recommendations of particular concern are:

- 9.1 – Cash withdrawals from ATM/EFTPOS to be restricted to \$200 per day
- 9.3 – Winnings above \$250 to be paid by cheque
- 10.1 – Existing gaming venue "shutdowns" to be extended
- 11.1 – Maximum bet to be reduced to \$1, and
- 11.2 – Maximum cash into a gaming machine to be limited to \$20, with further deposits prevented until balance is below \$20

AHA (Vic) particularly notes the Commission's comments that an effective pre-commitment scheme may render other interventions redundant and may also warrant a lesser restriction on the availability of cash through ATMs at the venue.

As the Commission is aware, the Victorian Government has already announced a schedule for the implementation of a voluntary pre-commitment scheme (2010-2016) that will be mandatory for all gaming machines in the State by 2015-16. It is intended to link all machines in the State, so that once a limit has been reached, the player will be banned from all machines for the break-in-play period.

Furthermore, from 1 July 2012 ATMs will be prohibited in all Victorian gaming venues.

The relevant legislation has already been passed by the Victorian Parliament and is extensive in its coverage in that ATMs are prohibited from:

- all areas of the gaming venue;
- the exterior walls of the venue;
- any land that is owned or leased (under a retail lease or otherwise) by the venue operator on which the venue is located, and
- any car park owned or occupied by the venue operator and used primarily by patrons of the venue.

From 1 January 2010 cash from ATM's in gaming venues will be restricted to \$400 per card per day prior to the prohibition coming into effect.

By the Commission's own assessment, pre-commitment and reduction in availability of cash are identified as the most efficacious interventions to minimise problem gambling.

On this basis, and having regard to the announced and legislated policies of the Victorian Government in regard to both pre-commitment and ATMs, AHA (Vic) puts to the Commission that other recommended interventions proposed in the draft report are redundant in the Victorian environment. The final report of the Commission should exclude Victoria from the application of such recommendations.

Yours sincerely,



Brian Kearney  
Chief Executive Officer  
Australian Hotels Association (Victoria)

