



22 November 2012

The Hon Jenny Macklin MP
Minister for Families, Housing, Community Services and Indigenous Affairs
Parliament House
CANBERRA ACT 2600
By email to: JMacklin.MP@aph.gov.au

Dear Minister

The Gaming Technologies Association (GTA) is the industry association representing the eight major manufacturers licensed to sell poker machines in Australian markets being Ainsworth Game Technology, Aristocrat Technologies, Aruze Gaming Australia, Bally Australia, IGT (Australia), Konami Australia, SHFL entertainment Australasia and WMS Gaming Australia.

We write in response to the release of the *National Gambling Reform Bill 2012* and the public hearings held last week by the Joint Select Committee on Gambling Reform. Having had the opportunity to consider and analyse the Bill and the evidence presented at the hearing, we write to advise you that the requirements of the Bill cannot be met.

The Bill requires that all new gaming machines must be pre-commitment capable by 31 December 2013¹. The definition of "pre-commitment capable" has been left to the Regulations, about which formal consultation has not begun. After the Regulations and related matters have been finalised, each Australian State and Territory will be required to consider incorporating the Bill's requirements into their respective legislation, regulations and standards; and then to enforce them. The Bill makes no reference as to how this might be achieved.

GTA has repeatedly put on the public record the processes necessary to make changes of such significance at a national level. Once the Regulations, definitions, functional specifications and technical standards are in place, then GTA's members will require at least 12 months development time for changes at the machine level, as was presented to your Department in December 2011 and also to the Joint Select Committee on Gambling Reform last week.

The 12 months development time above does not take into account the time needed for changes to the plethora of state-wide monitoring systems, casino management systems and venue loyalty systems. In addition, it does not take into account the complexity and potential delays which might arise at the State and Territory regulatory level as a result of the urgent need to assess and approve so many games, machines and systems.

¹ In s13(1) of the Bill

We urgently call on the Government to immediately amend the Bill by:

1. removing all the deadline dates²
2. adding that the development of Regulations, definitions, functional specifications and technical standards must be by consultation with respective stakeholders including State and Territory governments, and
3. defining mechanisms by which States and Territories will implement the requisite changes to their existing environments down to venue level.

A copy of this letter will be provided to all Members of Parliament, to assist in their consideration of the Bill later this month.

Yours faithfully



Andrew Hely
Chairman



Ross Ferrar
Chief Executive Officer

² In s13 and s15 of the Bill
