



15 March 2013

Liquor and Gaming Red Tape Reform
Office of Regulatory Policy
Department of Justice and Attorney-General
Locked Bag 180
CITY EAST QLD 4002

By email to redtapereform@justice.qld.gov.au

Re: "Red tape reduction and other reform proposals for regulation of liquor and gaming"
Discussion Paper

Thank you on behalf of the Gaming Technologies Association ("GTA") and its members for the opportunity to provide input as a result of the Discussion Paper. GTA applauds the Government's commitment to reducing the red tape burden on business; and to providing the right level of oversight of the gambling industry.

About GTA

GTA is a not-for-profit company limited by guarantee, established in 1990 for the purpose of promoting the development of Australia's manufacturing resources.

GTA's primary members provide gaming technology and equipment to hospitality venues in over three hundred jurisdictions worldwide, eight of which are in Australia. GTA's primary members include Ainsworth Game Technology, Aristocrat Technologies, Aruze Gaming Australia, Bally Australia, IGT (Australia), Konami Australia, SHFL entertainment (Australasia) and WMS Gaming Australia.

GTA members supply all of Queensland's new poker machines. All GTA's primary members are public companies or part of a public company and their primary focus is the development and supply of new games and gaming machines.

Whilst GTA's members have amassed vast experience in all matters surrounding gaming, many of the specific questions are more appropriately the domain of venues and their representative organisations. GTA would like to comment upon the following matters, which are referenced to the Discussion Paper for convenience:

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## **1.10 Providing for the licensing of second-hand dealers of gaming machines**

GTA conditionally supports this proposal.

GTA's members are licensed major dealers (LMDs) and similarly licensed in many other jurisdictions around the world. In providing the right level of oversight of the gambling industry, GTA considers that it is important for the Government to ensure that all participants continually demonstrate the highest standards of probity and integrity. Accordingly, GTA supports this proposal subject to:

- Requirements for licensed second-hand dealer of gaming machines equate to those for LMDs.
- LMD licences include licensing second-hand dealer of gaming machines.

Approved financiers should also be required to comply with the highest standards of probity and integrity.

## **2.1 Streamlining gaming administration provisions**

GTA supports this proposal.

## **2.3 Reviewing liquor and gaming subordinate legislation**

GTA supports this proposal.

GTA further suggests that, where regulations set specific limits such as the \$250 amount which a licensee is required to pay in Australian currency and the balance of the payment by cheque for a cancelled credit or jackpot payout; then this amount should be set by the Commissioner for Liquor and Gaming (rather than by regulation).

## **2.6 Providing local governments with a greater say in licensing decisions**

GTA does not support this proposal.

GTA's members have experienced instances in other (international) jurisdictions where local governments have not been prepared to give cogent reasons for their objections or comments on matters related to gaming.

## **3.2 Reviewing gaming machine maximum bet**

GTA supports this proposal and suggests that the maximum bet be made \$10.

However, a change to the maximum bet requires a corresponding change to the maximum Return To Player (RTP) which is currently 92%. GTA suggests that the maximum RTP should be unspecified.

*Note:* GTA disagrees with table 3.8 in the Discussion Paper. Although a number of jurisdictions regulate the spin rate, it is not possible to play a gaming machine at a sustained rate of 3 seconds.

## **3.3 Reviewing cash input restrictions on gaming machines**

GTA supports this proposal.

GTA suggests that any Australian banknote should be acceptable in gaming machines and further suggests that the maximum cash input limit be made \$1,000.

## **Other Matters**

### ***Installation and Service of Gaming Machines***

Venues and GTA's members have regularly experienced significant disruption of the process of supply of new gaming machines and games, due to the requirements of s231 of the *Gaming Machine Act 1991* which limits the installation and modification of gaming machines and systems to Licensed Monitoring Operators.

This function should also be available to LMDs.

### ***Submission of reports***

S173 of the *Gaming Machine Act 1991* requires licensed suppliers to provide reports to the commissioner "about the supplier's supply operations".

LMDs are currently required to provide QOLGR with notification of the sale price of gaming machines. GTA considers that this is not required, as QOLGR approves the sale process.

### ***Approval of gaming machines and games***

All gaming machines and games operating in Queensland are approved by the QOLGR. However, this process sometimes sees testing elements duplicated in other Australian jurisdictions and surprisingly significant durations before a game is approved.

GTA recommends that a review be undertaken of the current process for approval of gaming machines and games, such that:

- any duplications or inefficiencies are identified and addressed
- testing and approval timeframes are reduced