



**LEGISLATIVE ASSEMBLY**  
FOR THE AUSTRALIAN CAPITAL TERRITORY

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STANDING COMMITTEE ON JUSTICE AND COMMUNITY SAFETY

Mr Peter Cain MLA (Chair), Dr Marisa Paterson (Deputy Chair), Mr Andrew Braddock MLA

# Submission Cover Sheet

## Inquiry into Cashless Gaming

**Submission Number: 008**

**Date Authorised for Publication: 06 September 2023**

31 August 2023

[LACommitteeJCS@parliament.act.gov.au](mailto:LACommitteeJCS@parliament.act.gov.au)

**To: Standing Committee on Justice and Community Safety**

**Re: Submission – Inquiry into Cashless Gaming in the ACT**

The Canberra Southern Cross Club would like to thank the committee for the opportunity to put forward its views on cashless gaming and what that could look like in the ACT.

**Specific Terms of Reference positions:**

**1. What the implementation of card-based cashless gaming technology in the ACT would look like;**

Card-based cashless gaming removes the need for tickets and places the credit on a physical card. The player card can then move credit around the venue between gaming machines and taken to a cashier when they have finished. This offers a level of safety for patrons above tickets and cash. This is currently available and used extensively throughout New South Wales. Some ACT residents would be familiar with how this operates. This system has been requested by patrons who are familiar with the operation in NSW.

The above point still requires cash at the beginning and end of the player's journey.

The implementation of card-based cashless gaming can vary greatly. At its most basic level it would be welcomed. Where we begin to get concerned is forcing patrons to have to register to play an EGM. This would significantly impact our casual play, play by visitors to the ACT (attending events) and has an outcome that may result in Canberrans going over the border once again to play machines. We do not believe this is a good outcome for the ACT.

**2. Experiences in other jurisdictions of cashless gaming trials, with particular consideration to issues around implementation;**

As we are aware and from closely monitoring other Australian and New Zealand jurisdictions, the trials have not yet revealed anything of significance. The feedback we have been made aware of is that the cumbersome process of setting up a betting account appears to be turning participants in the trial away. We understand that changes are being made to the digital wallet trial and welcome the results of those trials.

**3. The nature and extent of money laundering that may be occurring in licensed premises in ACT through electronic gaming machines;**

Money laundering does not appear to be occurring in the ACT in numbers that would warrant serious intervention.

We operate in a jurisdiction where the \$20 note is the highest denomination that can be entered into a machine. This makes laundering money through poker machines extremely inefficient and as reported, at the Cubs ACT forum, highly unlikely. The maximum payouts of CRTs being only \$1500 (\$5000 in NSW) also makes the likelihood of money laundering in the ACT low.

**4. The extent to which card-based cashless gaming would impact organised crime in the ACT;**

If there was evidence of organised crime using poker machines to launder money in the ACT then card-based cashless gaming would likely hinder criminal operation.

**5. The potential impacts on reducing gambling harm from electronic gaming machines in the ACT;**

The Club supports the introduction of card-based cashless gaming to bring us in line with NSW venues. Card-based cashless gaming is safer for our patrons and removes the risk that comes with carrying cash in venues.

We have yet to see any conclusive evidence that card-based cashless gaming has impacts on reducing gambling harm.

**6. Any legislative or regulatory considerations that would be required if card-based cashless gaming were to be implemented in the ACT;**

This would be dependent on the type of card-based cashless gaming model being proposed. We are not aware that the current NSW model would require changes to legislation.

**7. Any cross-jurisdictional issues that may arise from the implementation of cashless gaming;**

Cross jurisdictional issues are unlikely to occur if the cashless gaming model that is implemented is in lock-step with that of NSW. Having a model that is complicated, difficult to use and onerous on venues compared to that in NSW will result in a benefit for the operators of EGMs in areas surrounding the ACT. ACT will be left to pick up the cost of any ACT residents who choose to play machines across the border and come into harm.

**Huw Bennett**

