



Star City
Submission to IPART Review of
Gambling Harm Minimisation
Measures
November 2003



EXECUTIVE SUMMARY

Star City welcomes the IPART review of gambling harm minimisation measures.

In recent years, various harm minimisation measures have been introduced by the NSW Government for implementation by the gaming industry. We believe that some of these initiatives have been effective and have the support of Star City. Others were introduced without any meaningful research or investigation into whether they would actually help prevent or reduce the incidence of problem gambling. In many cases they have resulted in extra costs for gaming operators and inconvenience for patrons but it is highly doubtful whether they have been successful harm minimisation measures.

Star City recognises that gaming operators need to continue to work with the State Government and counselling services to assist problem gamblers. While studies estimate that only 2 to 3 three per cent of the adult population are at risk of developing a gambling problem, the industry cannot ignore their need for assistance.

Some of the initiatives being reviewed by IPART have already been introduced by Star City. A number were introduced voluntarily before they were required by legislation. This is because, despite the claims of the industry's detractors, there is no benefit to Star City in attracting problem gamblers to the complex. Star City encourages those with gambling problems to ban themselves from the casino. More than 1500 people have taken advantage of this program and are currently self-excluded from the casino.

Star City believes there is no point introducing further harm minimisation regulations unless authorities have evidence that they will help prevent and reduce the incidence of problem gambling. We believe that, to avoid introducing ineffective harm minimisation measures, research should be conducted into any proposals for further restrictions or controls.

An evidence based approach will ensure that any new measures will genuinely help those in need of assistance – without unnecessarily damaging the industry.

Star City firmly believes that the two main priorities of public policy makers, counselling services, industry and the community must be:

1. How do we help those people with a gambling problem?
2. How do we minimise the chance of other people developing a gambling problem?

Star City is a member of the GIO (Gaming Industry Operators) group which has provided an extensive submission to this inquiry. The GIO submission includes details of research projects conducted to justify the industry's stance on many of the issues under review. Star City also endorses the submission by the Australian Casino Association to IPART.

We look forward to co-operating with the IPART review and to working with the State Government to implement new any initiatives which will encourage and promote responsible gaming.



KEY GOVERNMENT POLICIES

Star City accepts and supports the core Government policies listed in the terms of reference for this inquiry which are not to be reviewed.

Some of these restrictions apply only to hotels and clubs. Star City makes no comment on those policies.

The policies which apply to the casino are generally supported. However, Star City believes the current cap on gaming machine numbers should be reviewed periodically.

In relation to self-exclusion, Star City has operated a program since the temporary casino opened in 1995. More than 1500 people currently have self-exclusion orders which prohibit them from returning to the casino. While the onus is on patrons to comply with these orders, Star City recognises that some patrons may attempt to re-enter the casino in contravention of their order.

The casino's Security and Surveillance employees make every effort to detect and remove people who breach their self-exclusion orders. Any patron who takes out a self-exclusion order must undertake an assessment from a recognised counselling service before any consideration will be given to lifting the order. All self-exclusion orders apply for a minimum of 12 months. Any patron taking out a second self-exclusion order is regarded as having a serious gambling problem and the second order cannot be revoked.

While the system is not foolproof, it assists many people to avoid gambling while they seek assistance and counselling.

HARM MINIMISATION MEASURES

It is critical that evidence-based research precede any further reforms to the gaming industry to ensure that government and industry resources are directed to the most suitable methods of addressing the difficult issue of problem gambling.

Star City supports harm minimisation measures which are proven through research to be effective in minimising problem gambling.

We recognise that a small proportion of the adult population, around 2 – 3 per cent, are at risk of developing a problem with their gambling and every effort must be taken to assist these people.

We would assert that some of the measures introduced in the past to address problem gambling by limiting access to the product, changing the features of gaming machines and requiring new facilities in gaming venues have been largely cosmetic and will do little to materially assist problem gamblers.

Star City believes any additional measures introduced in future should be “evidence based”. We would urge IPART to recommend thorough research and testing of any new initiatives to determine whether they are effective before they are implemented.

In relation to specific measures being reviewed by IPART as part of this inquiry, Star City puts forward the following views:

“CIRCUIT BREAKERS”

Compulsory shut down of gambling venues

The 6 hour shutdown of poker machines currently applies only to hotels and clubs. The Government has acknowledged that Star City paid for a licence to operate machines and tables 24 hours a day so the casino is not affected by the shutdown.

As with other measures being reviewed by this inquiry, Star City believes research should be undertaken to determine whether the shutdown is effective in assisting problem gamblers. The result of this research should be used to determine whether to maintain, reduce or drop the poker machine shutdown in clubs and hotels.

Ban on smoking in gambling venues

During the last 2 years, Star City has been represented on a working party with clubs, hotels, the Department of Health, unions and other organisations to review smoking laws in NSW gaming venues. Smoking has already been banned in restaurants, the gaming tables at Star City and the area immediately adjacent to bars.

In fact, we estimate that approximately 77 per cent of the main gaming floor at Star City is smoke-free. This includes all gaming tables, several restaurants, bar areas, TAB area, toilets and some gaming machines.

The working party agreed on a package of reforms including a requirement for a section of one bar to be smoke-free in all gaming venues from July 2003. Star City has implemented this requirement. In fact, two bars have smoke-free areas.

The committee also agreed that there must be an entire smoke-free bar in all gaming venues with more than one bar from July 2004. Again, Star City is well advanced in planning for this development.

The State Government recently announced that a new working party will be set up soon to consider further restrictions on smoking in gaming venues. The hotels, clubs and Star City will all be represented on that working party along with unions, health experts and government officials.

Star City believes this is the appropriate forum to review the smoking laws in gaming venues. The process of phasing-in smoking restrictions is working well and should be continued. It means venues and patrons are given adequate time to prepare for changes unlike the situation in Victoria where bans were introduced almost overnight.

Star City urges IPART to recommend that the Government’s working party on smoking should continue to consider a gradual introduction of smoking restrictions. Certainly, extensive research should be conducted before smoking is banned at gaming venues as a problem gambling initiative.

We are unaware of any evidence that the smoking bans introduced in Victoria last year have had any impact on the incidence of problem gambling in that State.

Periodic shut-down of individual machines

This is a cosmetic initiative which would do little to assist problem gamblers. The GIO submission to IPART gives a full outline of the problems this proposal would create for recreational gamblers. They include

- Patrons who have a gambling problem would simply move from a machine which has been closed down to a machine which is operating.
- Some players are likely to increase their play rates while the machines are on.
- Some players are likely to increase their bet rates before their machine is switched off.

The Liquor Administration Board has already rejected this proposal and Star City urges IPART to follow suit.

Periodic information messages to gamblers using gaming machines

We are unaware of any research based evidence that indicates this would be an effective harm minimisation measure.

There is already an array of brochures and signs in all gaming venues which advise patrons about the odds of games, their chances of winning and where they can seek help. In fact, the G-line counselling message is attached to every gaming machine at Star City.

It is unlikely that flashing similar information on poker machines periodically would do anything to deter problem gambling. Interestingly, research conducted over the last 12 months on behalf of the Nova Scotia Gaming Corporation in relation to responsible gaming features on video lottery terminals (VLT's) in Canada (such as pop-up reminders displayed at regular intervals) have been deemed to have little positive impact on problem gambling.

However, as with most of the measures being reviewed by IPART, the impact of this proposal should be researched before consideration is given to implementing it in NSW. If it is shown to have a positive impact on reducing the incidence of problem gambling then we must seriously consider such initiatives.

Restrictions on alcohol consumption by gamblers

Star City already has in place a Responsible Service of Alcohol program aimed at ensuring patrons do not become intoxicated while on the casino premises.

Patrons suspected of approaching intoxication can have their drinks slowed or cut off or they can be asked to leave the premises.

Gaming staff are trained to be on the lookout for patrons approaching intoxication so they do not gamble while betting. This system is working well. There is no evidence that further restrictions are warranted. The overwhelming majority of patrons who drink sensibly while playing the machines or tables would be unfairly penalised if this measure was introduced.



Performance of self-exclusion schemes

As outlined earlier in this submission, Star City has had a self-exclusion program in place since the temporary casino opened in 1995.

At present more than 1500 people are self-excluded from the casino. Star City encourages people with a gambling problem to use this facility.

The onus is on patrons who take out self-exclusion orders to comply with them. Star City's Security and Surveillance officers who detect self-excluded patrons ask them to leave the premises as soon as they are sighted on the gaming floor. Persistent offenders can be issued with a non-voluntary exclusion order. If the patron breaches this order they may be prosecuted by the Casino Control Authority.

Star City acknowledges that it is not possible to prevent all self-excluded patrons from returning to the casino. People who are determined to breach their orders can disguise themselves to try to avoid detection.

However, these occasional breaches by self-excluded patrons should not be used to diminish the success of the overall scheme. Many law-abiding patrons who self-exclude are reluctant to breach their orders. They stay away from the casino until they have undertaken counselling and have had their self-exclusion orders revoked.

Star City believes that, despite the fact that self-exclusion programs can be abused, they are a valuable self-help tool for many people to avoid gambling when they are unable to control their actions. The Government should continue to encourage gaming venues to operate self-exclusion programs.



INFORMATION FOR GAMBLERS

Requirements to display certain signage

Star City currently provides signage at all entrances to the casino advising people to bet sensibly. Details of the G-line counselling service phone line are included.

The G-line number is also provided in all gaming advertising and at all gaming tables.

Star City is unaware how widely this information is used and whether it is effective. However, we believe our patrons should be aware of the counselling services available for problem gaming and has no objection to providing this signage.

Display of clocks in gaming machine areas

Star City has recently installed clocks throughout the main gaming floor so that patrons can check the time from any machine in the casino. They form part of the company's Responsible Gaming Code.

In our view, it is doubtful whether the provision of clocks has any significant benefits in terms of harm minimisation.

However, since they are already installed, Star City has no objection to retaining them on our main gaming floor.

Requirement to provide player information brochures in gambling venues

Star City has devoted two large areas on the main gaming floor of the casino for brochures and other player information. Patrons can obtain all the Government's "Playsmart" brochures as well as information about unattended children, self-exclusion and counselling services.

Again, as part of our Responsible Gaming Code, Star City endorses the principle of informed choice. We therefore believe it is essential to have appropriate information available for players. Whilst the level of effectiveness of such information as harm minimisation tools may be questioned, Star City believes it should provide important consumer information to its customers. There may, however, be scope to review the list of compulsory signage to reduce clutter and to ensure that such measures are effectively targeted at "at risk" players.

Requirement to display certain information on betting tickets, lottery and keno entry forms, "how to play" information and websites

It is questionable whether this is an effective harm minimisation measure. However, Star City supports the principle of informed choice and has no objection to providing this information as required.



Role of community services, including problem gambling counselling services in addressing harm minimisation objectives

Star City does not claim to be expert in the area of problem gambling counselling services. The company provides extensive G-line signage around the complex so patrons can seek help from experts if they are at risk of developing a problem.

Star City has also engaged Wesley Gambling Counselling Services to provide emergency assistance for patrons in distress. Wesley also provides strategic advice on measures which can be taken by the casino to address issues related to problem gambling.

In addition, Star City requires all patrons who take out self-exclusion orders to undergo an assessment by a recognised counselling service before consideration is given to revoking those orders.

Star City relies on the professionalism of these counselling services to assist those seeking assistance.

It is a matter of concern that problem gambling counselling services do not have to be licensed or accredited. People without formal qualifications can set themselves up as expert counsellors for people at risk.

Star City would support any move to introduce accreditation for problem gambling counselling services.

Another issue which should be examined is the operation of the Casino Community Benefit Fund. This Fund meets the cost of providing the G-line counselling service as well as other research and assistance programs for problem gamblers. At present, Star City is the only gaming venue which contributes to the CCBF. This is despite the fact that 80 per cent of people calling G-line have poker machine related problems and Star City has less than 2 per cent of the State's poker machines.

Star City contends that all gaming venues in NSW should contribute 1 per cent of their gaming revenue to the Fund. This would generate more money for the Fund and ensure that all sections of the industry contribute to the cost of assisting problem gamblers, including the conduct of appropriate research.

It may also enable the Government to provide additional multi-lingual counsellors for the G-line counselling service.

Contact cards for counselling services

As outlined above, we believe there is ample information at Star City and other gaming venues about the counselling services available to people with gambling problems.

Details of the G-line counselling service are provided in brochures on the main gaming floor, in toilets, at all tables and on all machines.

Star City believes the current arrangements are adequate and there is no need for the provision of contact cards as well.

Compulsory display of payout ratios and probability of winning specific prizes

This initiative was proposed by the Gaming Industry Operators (GIO) group of which Star City is a member. It would ensure that patrons playing gaming machines are aware of their chances of winning a major prize. As outlined earlier, Star City supports moves to provide patrons with all the information they need to make an informed choice about whether to gamble.

The proposal is supported by Star City but we urge IPART to recommend the use of existing technology to meet this goal.

General advertisements highlighting problem gambling

The Casino Community Benefit Fund ran a series of television advertisements related to problem gambling during 2002. Star City is unaware of any research into the effectiveness of those commercials.

If there is evidence that advertisements like these are effective in encouraging responsible gambling, Star City would support a regular campaign. Again, any decision to run an advertising campaign should be based on evidence which shows it would help reduce the incidence of problem gambling.

We contend that any advertisements should:

- be balanced and targeted at those individuals “at risk” so that they do not further stigmatise gambling products or shame individuals unfortunate enough to have developed problems;
- explain that only a small percentage of the adult population are at risk of developing a gambling problem;
- be well researched (including learning from the communication campaigns of other jurisdictions – both nationally and internationally) and tested with focus groups of both problem gamblers, recreational gamblers, non gamblers and industry stakeholders;
- be co-ordinated with the look and feel of existing responsible/problem gambling collateral so that there is a common branding of communications to assist with awareness;
- be sensitive to the needs of culturally and linguistically diverse communities; and
- if introduced, be subject to testing of their effectiveness against appropriate key performance indicators.

Display of monetary value of credits, bets and wins

This initiative is supported by the GIO. This is another measure which will ensure that players are fully informed about their gambling.

Star City supports the introduction of this measure.

Information for individual players on their gambling session

This initiative is supported in principle by the GIO subject to the necessary technology being available on slot machines.

We support the concept of players being able to gain access to information about how long they have been playing a slot machine and how much they have spent or how much they have won. This helps them to make informed decisions about their longer term gambling habits.

Star City patrons can already apply for monthly activity statements. They show the total turnover of the customer during the month in question, total wins, net expenditure, and the length of time the player's card was used on a gaming machine.

If technology is available which enables additional information to be provided to players without undue cost and disruption to the industry, then the concept is supported.

As the GIO points out, this information should be called up by the individual player rather than being flashed on the screen at random. This would protect the player's privacy without jeopardising their enjoyment.

LIQUIDITY CONTROLS

Requirement for large payouts not to be in cash

As part of our Responsible Gaming Code which encourages cooling off periods for large wins, Star City has made provision for players who win at the tables or machines to take their payments in the form of a “winner’s cheque”. Few patrons seek to take advantage of this option.

The majority of patrons visit the casino with cash or obtain funds from the automatic teller machines on site. These funds are obtained for a variety of uses throughout the complex, including the purchase of meals, beverages, gambling, theatre tickets, accommodation, taxis, use in the retail arcade etc.

Many patrons would object to the inconvenience of being paid by cheque as they would not be able to access the funds for several days. Other options, such as payment direct into a bank account, would be unsatisfactory to many players, including those from countries outside Australia who may have limited access to such facilities while travelling.

There is no evidence that this would be an effective harm minimisation measure. It would certainly inconvenience the overwhelming majority of patrons who do not have a gambling problem.

Research should be conducted before this measure is considered further.

Prohibition on providing credit for gaming

Star City is already prohibited from providing credit for gaming. This restriction prevents people from gambling more than they can afford or spending money they do not have.

The measure is supported by Star City and should remain in force.

Requirement to locate ATMs away from gambling areas

The automatic teller machines at Star City are already located off the main gaming floor. Patrons must leave the gaming area to access the machines. This provides a natural “cooling off” period for players who are contemplating withdrawing additional funds to gamble.

Star City believes there is a need to balance the need for patrons to be able to access funds at gaming venues and the need to encourage responsible gambling.

Suggestions that ATMs should be banned from gaming venues are strongly opposed by Star City. This would only encourage patrons to carry large amounts of cash to the gambling venues and make them targets for theft. It would also inconvenience patrons who need money to use in restaurants, bars, theatres and other facilities in clubs, hotels and the casino as outlined above.

In the case of Star City, the automatic teller machines are widely used by local residents because of the shortage of banking facilities in the Pyrmont area.

Star City believes ATMs should be allowed at gaming venues but, wherever possible, they should not be located in gaming areas.

Restrictions on note acceptors

There is no evidence that this would be effective as a harm minimisation measure. If note acceptors were unable to take \$50 and \$100 notes players would simply replace them with \$20 notes. This would inconvenience patrons and, in the absence of evidence that it would be effective in deterring problem gambling, should not be recommended by this inquiry.

We note the following conclusions of the report prepared by Professor Alex Blaszczynski (November 2001) for the GIO in relation to the reconfiguration of note acceptors:

“The present day study found no evidence supporting the contention this modification (that is the removal of \$50 and \$100 note acceptors) would effectively reduce gambling behaviour amongst problem gamblers)”

We also understand that the Victorian Government has banned the use of \$100 note acceptors. We are unaware of any evidence which has demonstrated this measure has had any impact on the incidence of problem gambling in that State.

Lower limit on maximum bets on gaming machines

Again, there is no evidence that this would be an effective harm minimisation measure.

Some patrons, who responsibly set aside a specific amount to spend at a gaming venue, may simply spend longer on machines if maximum bets were lowered. It is questionable whether this is a satisfactory outcome.

Star City believes no decision should be made to lower maximum bets unless research is commissioned which indicates that it would be an effective harm minimisation measure assisting those players at-risk whilst not detracting from the enjoyment of recreational players.

Pre-commitment or smart cards which enable financial limits to be set

Smart cards are apparently being trialed in some clubs but, at this stage, there is no published research to indicate whether they help prevent problem gambling.

We would suggest that clarity needs to be provided around the use of the term “smart card” as it is simply one form of technology or card available which individuals can use. We gather that IPART’s focus here is consideration of the viability of providing players with the option of setting their own betting limits. Star City already encourages patrons to set themselves a limit and stick to that limit when gambling at the tables or machines.

Any form of card based play should only be considered if it meets the overall objectives of assisting problem gamblers without detracting from the enjoyment of recreational gamblers. Any card system should not create barriers to gaming machine play and should not impose unreasonable costs and administrative burdens on the industry.

Star City would caution against relying on a voluntary system to evaluate the success of smart cards. It could be argued that people who volunteer to use smart cards are also more likely to make sensible decisions and therefore gamble responsibly.

IPART also needs to consider whether the use of such technology is akin to requiring players to hold a “licence” in order to play a gaming machine. Given that gaming machines are used by

about 40 per cent of the adult population each year – and only 2-3 per cent are at risk of developing a problem – it must be questioned whether this is an effective use of technology for a product which is supposed to be fun and enjoyable.

In summary, Star City would oppose the introduction of smart cards in gaming venues until research has demonstrated it would be an effective harm minimisation measure.

Restrictions on daily cash limit in ATMs close to gambling venues

Star City believes this proposal is unworkable and there is no evidence that it would have harm minimisation benefits.

Star City attracts up to 30,000 patrons a day and each person's financial situation is different. Financial institutions, together with their customers, are in the best position to determine an appropriate cash limit for each person. Certainly, gaming operators are not capable of setting cash limits, nor should they be set by bureaucrats or the Government. Again, it needs to be recognised that ATMs within gambling venues are used for a variety of reasons, not just gambling.

Similarly, it would not be feasible to set the same cash limit for each person. People with a high disposable income obviously should be allowed to draw out more funds than those with restricted incomes. Again, this is a matter for the person's bank or financial institution to determine. Star City urges IPART to reject this proposal.

Reducing the maximum permissible win

The maximum permissible win on poker machines in clubs, hotels and casinos is already restricted by the State Government. This limit is well below the maximum prizes offered by lotto, keno, lotteries and other games of chance.

There is no evidence that jackpots generally attract problem gamblers or that reducing jackpots would have any impact on the level of problem gambling. As the GIO has pointed out previously, problem gamblers would be attracted to lotteries and lotto games if they were seeking large jackpots. In the absence of evidence, this proposal should not be considered further.

Further possible changes to affect the rate of loss or play per hour

Star City would require more details about these proposals before being in a position to comment.

However, there is no evidence to suggest that the rate of loss per hour is a contributing factor to problem gambling.

If the rate of loss is reduced it may encourage people to gamble for longer periods until they have spent the money they have set aside for play. This is not a desirable outcome.

Forced payment of wins when certain level is reached and payment then to be only by cheque

This proposal would appear to be unworkable and again disadvantage the recreational player. There would be nothing to stop players continuing to play after they have been paid out. Many patrons who take cash to a gaming venue would also object to being paid by cheque. Those who wanted to use other facilities at the casino – such as the hotel, restaurants and bars – would resent having their entertainment money locked up in cheque.

It would be difficult to set an appropriate “win level” for players, particularly when some players have vastly different incomes to others. What may be a big win for one player may be insignificant for others.

It is timely to again state that we firmly believe the focus of government, counselling services and industry must be aimed at treating the individual rather than changing the gambling product and inconveniencing all players, even if they are not at risk of developing a gambling problem. Such an approach recognises that a single solution is not going to work for every person who has a problem with their gambling.

The proposal contains numerous flaws and is unlikely to be an effective harm minimisation measure.

RESTRICTED PROMOTION OF GAMBLING

Controls on advertising

The State Government has already banned advertisements for poker machines in the media, brochures and other promotional material.

Whilst Star City complies with this ban, there appears to be no evidence that it is an effective tool in preventing problem gambling. Star City believes research should be conducted to determine the impact of this measure before further controls are considered.

We also refer to the Productivity Commission's 1999 report on Australia's Gambling Industries in relation to the advertising of gambling:

"The Commission considers that there are grounds for tighter controls on gambling advertising, where it is felt that the information provided by a gambling supplier would have the effect of reinforcing inherently false beliefs about the odds of winning or about the way gambling technologies work. The Commission is of the view that, notwithstanding existing general consumer protection measures, there are grounds for legislatively based codes specific to gambling. These should ensure that gambling advertising and promotion (across all modes of gambling) does not:

- *Give the impression that gambling is a reasonable strategy for financial betterment;*
- *Target disadvantaged groups in a way that is calculated to increase their participation because of their desperate financial circumstances;*
- *Lead to a false understanding of how gambling technology works (such as implying that skill matters to a game which is purely driven by luck);*
- *Encourage people to gamble in a way that is irresponsible, such as drinking and gambling, staying for long periods in a venue in order to be able to be eligible for an attendance prize or other inducements or manipulating people to play repetitively; or*
- *Target high risk groups of gamblers, for example, through complimentaries or individual promotions.*

There are also grounds, given its public health nature, for all gambling advertising to incorporate a risk warning about the product (using an appropriate slogan).

(Reference: Productivity Commission 1999, Australia's Gambling Industries pp 16.38 and 16.39)

The NSW Government has already introduced measures which are more stringent than those recommended by the Productivity Commission. Accordingly, we question whether any further restrictions are warranted in the absence of research or evidence to the contrary.

Controls over player reward schemes

The State Government has imposed restrictions on player reward schemes which prohibit cash prizes and limit the value of other prizes which can be offered to players.

These restrictions have made promotions less attractive to the 97 per cent of people who do not have a gambling problem. They have been penalised by this measure. Yet there is no evidence that the limits on player reward schemes have any impact on problem gambling.

Star City believes research should be conducted to determine the impact of this measure before further controls are considered. That research could also determine whether the current controls are warranted.

Restrictions on promotions and other inducements to gamble

The State Government has already imposed a ban on cash prizes and a limit of \$1000 on the value of non-cash prizes for poker machine promotions.

No research was carried out before these measures were introduced to determine whether they would be effective. Star City is unaware of any research into whether these measures have encouraged people to bet more sensibly in clubs, hotels and the casino.

The GIO has asserted that problem gamblers are unlikely to be attracted to promotions because they slow down their rate of play and become a distraction. It also points out that the majority of participants in promotions are recreational players who enjoy the chance to win an additional prize.

It is Star City's view that this type of initiative should remain in force only if there is evidence that it an effective harm minimisation measure. If studies show that these restrictions are helping to curb problem gambling, Star City will support their retention. In the absence of this evidence, gaming venues should be allowed to offer promotions which are marketed responsibly, popular and "safe" for the overwhelming majority of patrons.

Controls on gaming machine artwork

All poker machine games and artwork must receive approval from the Liquor Administration Board before they can be introduced in clubs, hotels and the casino.

While there is no indication that restricting artwork is effective in preventing problem gambling, Star City believes these arrangements should remain in force.

However, we agree with the GIO position that further restrictions should not be introduced which impact on the entertainment value of gaming machines.

Possible elimination of double up and other similar game features

Double-ups and game features are popular among poker machine players because they add another dimension to games.

Any move to prohibit these features would penalise the 97 to 98 per cent of people who enjoy playing poker machines and are at little or no risk of developing a gambling problem.

IPART should conduct appropriate research to determine whether the elimination of these features would be an effective harm minimisation measure before considering the matter further.

Availability of alcohol and other refreshments to gamblers

Star City does not provide free alcohol to the general public at gaming machines or tables. Customers may purchase drinks through cocktail servers who take orders periodically. Complimentary soft drinks and tea and coffee are provided to slot machine players. High level players using loyalty cards can obtain complimentary drinks but most opt for non-alcoholic beverages.

Star City believes these services are reasonable and should not be viewed as an inducement to gamble. Drinks are provided to customers of all kinds of businesses (airlines, car service centres etc). Gaming venues should also be able to sell or supply alcohol to patrons as long as it is served responsibly.

As outlined earlier, Star City has developed a Responsible Service of Alcohol program aimed at preventing customers from being served to intoxication. All front line staff are required to complete this course before working on the gaming floor.

Star City agrees with the principle behind this proposal – that people should not be allowed to become intoxicated while gambling.

However, we would assert that this aim can be met through the current laws relating to responsible service of alcohol and gambling and there is no need for further legislative reforms.



COMMUNITY/COUNSELLING SERVICES

Requirement for gambling operators to enter into agreement with counselling services

Star City has had formal arrangements with recognised counselling services since the temporary casino was opened in 1995. This action was taken long before the State Government made it mandatory for gaming venues to make such arrangements.

Our current arrangement is with Wesley Gambling Counselling Services. They are able to provide emergency assistance to any patron in distress as well as assessments of patrons who are seeking to have their self-exclusion orders overturned.

Star City believes this advice and assistance is invaluable. Wesley and other similar organisations are expert in dealing with problem gamblers and can provide the assistance and advice which is needed by some problem gamblers.

We support the requirement for gambling operators to have formal agreements with counselling services.

TECHNICAL MEASURES

Slower reel speeds

There is no evidence that slowing reel speeds would have any impact on problem gambling.

We note that the Blaszczynski report of November 2001 to the GIO group concluded that:

“This study suggests that introducing slower reel spins to machines would negatively impact on the enjoyment of all participants, social and problem gamblers alike. While it was found to reduce the profitability of machines, there was little evidence that it would reducing problems associated with gambling.”

We would urge IPART to undertake extensive research before considering this measure further.

Removal of visual and sound stimuli

The visual and sound stimuli are a fundamental aspect of the fun and excitement of playing poker machines. This proposal would take away much of the enjoyment experienced by the 97 to 98 per cent of players who do not have a gambling problem.

Star City agrees with the GIO view that there is no evidence that sounds attract problem gamblers or that any restrictions on sounds would discourage problem gamblers. This proposal is therefore unlikely to be effective as a harm minimisation measure. Problem gamblers are likely to play machines whether or not they have sound and visual effects.

Star City urges IPART to undertake research on this proposal before considering it any further.

Requirement for human intervention in large payouts

Slot machine attendants already attend all large payouts at Star City. Machines generally lock up after jackpots and cannot be played until an attendant has cleared the jackpot.

On the main gaming floor, any player collecting more than \$100 must receive a written voucher from an attendant. In the private gaming room, any player collecting more than \$200 must receive a voucher.

Most players prefer to collect their winnings as quickly as possible. In fact, players may be tempted to play for longer periods if there is a delay in their payout.

Star City would therefore oppose this measure and encourage IPART to look at measures which allow players to collect their winnings quickly and easily.

Requirement for natural light in gaming areas

This is another cosmetic initiative which is outdated and unnecessary in an era when clocks are compulsory in gaming venues and most people have their own watches – so they know whether it is dark or light outside.

The main gaming floor at Star City backs on to Sydney Harbour so there is already natural light on the main gaming floor. However, there are some venues which would have to undertake extensive renovations to meet this requirement.

From the experience in gaming venues in Victoria, there is no indication that this measure would assist problem gamblers and, while it is already being met by Star City, it should not be compulsory.

Requirement for gambling patrons to be visible to people outside the gaming venue

Star City is surprised that this proposal has been put forward for investigation. In the past it has been commonplace for regulators to require gaming operators to shield gamblers from the view of the general public. Indeed, there are several areas at Star City where frosted glass is required so minors cannot see the gaming floor.

Star City believes this measure is unlikely to be effective as a harm minimisation measure. We believe venue operators should be able to use their discretion to determine whether gaming areas are open to public view or not.

The impact of music being played and display of lights when a win takes place

Part of the enjoyment of gambling is celebrating a win. This is enhanced by the provision of lights and music when a payout is made. These enhancements are, however, unlikely to have any impact on problem gamblers. Players who get themselves into financial trouble through gambling are unlikely to be influenced by music and lights. Any attempt to ban lights and music would simply take away some of the enjoyment experienced by the 97 to 98 per cent of players who do not have a gambling problem.

This proposal should be the subject of research before it is considered any further.