

Parliament of Victoria

Gambling Legislation Amendment (Pre-commitment and Carded Play) Bill 2024

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Bill Brief

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Terminology

Electronic gaming machine (EGM)	A ‘device for playing a game of chance or a game that involves chance and skill that can be wholly or partly electronic. Players make bets on the machine with winnings returned as credits’. ¹ In Victoria, the terms ‘gaming machine’, ‘electronic gaming machine’ and ‘poker machine’ (pokies) are synonymous.
Gambling	Gambling ‘requires a player to risk losing something of value (usually money) for the chance of winning more. Gambling outcomes may depend on correctly predicting an uncertain outcome (such as a particular horse coming first in a race) or luck (such as a winning combination of symbols on an electronic gaming machine)’. ²

¹ R. Finkelstein (2021) *Report of the Royal Commission into the Casino Operator and Licence, Volume 1*, final report, October, Melbourne, Royal Commission into the Casino Operator and Licence, p. xiii.

² *ibid.*, p. xiv.

Gaming	A ‘formalised expression of play. Games can come in many different types and genres, such as board games or electronic/digital games played via a computer or smartphone’. ³
Loyalty scheme	A ‘system, used in connection with the operation of gaming machines in approved venues or a casino, in which the players of those gaming machines accumulate bonus, loyalty or reward points from playing the gaming machines; or any other system that tracks a player’s expenditure on a gaming machine other than a pre-commitment mechanism or pre-commitment system’. ⁴
Melbourne Casino ⁵	The Southbank casino operated by Crown Melbourne. Also referred to as Crown Casino or, in this paper, the casino.
Money laundering	The ‘act of disguising or legitimising the origins of money that is used in or derived from crime’. ⁶
Pre-commitment system	A ‘system that involves a gambler setting a loss limit and a time limit before they commence gambling. This can be mandatory or voluntary’. ⁷
Spin rate	The ‘interval between spins on an electronic gaming machine’. ⁸
YourPlay	The ‘voluntary pre-commitment system that is mandatory under the <i>Gambling Regulation Act 2003</i> (Vic) for all electronic gaming machines at all gaming venues in Victoria, including the Melbourne Casino. The system allows patrons to pre-set money and/or time limits for gambling on electronic gaming machines’. ⁹

³ *ibid.*, xiv.

⁴ *Gambling Regulation Act 2003*, s 1.3 (p. 23).

⁵ Finkelstein (2021) *op. cit.*, p. xiv.

⁶ *ibid.*, xiv.

⁷ *ibid.*, p. xv.

⁸ *ibid.*, p. xvi.

⁹ *ibid.*, p. xvi.

Executive Summary

The Gambling Legislation Amendment (Pre-commitment and Carded Play) Bill 2024 is the continuation of reforms aimed at reducing the negative impacts of electronic gaming machines (EGMs) in the community. EGMs are a type of gambling specifically programmed to provide a revenue stream to gaming venues. While some of this revenue contributes to ‘community benefits’ processes, EGMs have been associated with gambling harm disproportionate to the number of people who use these machines.

The Bill seeks to introduce mandatory carded play and transition the current voluntary pre-commitment system into a compulsory one. It also aims to slow the rate of player losses by reducing the frequency of minimum spin rates. This is part of a push to reduce gambling’s harms to the community as well as address the use of EGMs for criminal activities, such as money laundering.

This Bill Brief surveys the role of EGMs within the Victorian gambling economy and summarises the events leading to the reforms in the Bill. It summarises the Bill and stakeholder responses. The paper then compares some of Victoria’s EGM regulatory features with approaches in other states and territories, before providing an update on current issues and the most recent statistics regarding Victorian gambling behaviour and losses to EGMs.

Bill information

Introduced: 26 November 2024

House: Legislative Assembly

Second Reading: 27 November 2024

Commencement:

This Act comes into operation on the day after the day on which it receives the Royal Assent.

Links to key documents including the Bill, Explanatory Memorandum, Statement of Compatibility and Second reading Speech can be found at the [Library’s Infolink page for this Bill](#).

For further information on the progress of this Bill, please visit the [Victorian Legislation and Parliamentary documents website](#).

Introduction

Electronic gaming machines (EGMs) were initially introduced into Victoria in 1992, and since then their presence has been accompanied by warnings about the dangers they pose to communities. The number of machines has not wavered much since the initial statewide cap of 30,000 was set, and those who use them represent a minority of the community. However, EGMs' financial impact is outsized, with the promise of revenue making them an attractive proposition for many hotels and clubs. While EGM operators are obligated to use some of these profits towards community benefits, the financial losses incurred by this small cohort of EGM users continue to surge above losses to other sorts of gambling, such as sports betting and lotteries.

Some of this is due to the prevalence and accessibility of EGMs, but EGMs are also designed to condition players to spend both more money and more time and are especially dangerous to those who engage in problem gambling. Australian EGMs, known alternatively as poker machines or pokies, have proven to be particularly effective by this measure. Concerning for policymakers is the recent uptake of EGMs among younger people.

In recent years, research in many jurisdictions has focused on both the dangers of gambling, particularly with EGMs, and ways of reducing harm. The Victorian Government has made a number of announcements regarding gambling reforms since 2021, when the Royal Commission into the Casino Operator and Licence was completed. Several recommendations from that inquiry were accepted and implemented in the operation of Melbourne Casino as a result, and some of these measures, including mandatory carded play and pre-commitment, have been proposed for expansion to hotels and clubs.

The Gambling Legislation Amendment (Pre-commitment and Carded Play) Bill 2024 ('the Bill') enacts these recommendations and aims to reduce the negative impacts of electronic gaming machines in the community. The Bill seeks to introduce mandatory carded play and transition the current voluntary pre-commitment system into a compulsory one, as well as reduce the frequency of minimum spin rates. In addition to reducing harm from gambling in the community, it also seeks to address criminal behaviour such as money laundering, which has been a point of concern in relation to EGMs.

This Bill Brief provides background on the place of EGMs within the Victorian gambling economy and summarises the events that have led to the current reforms. It summarises the Bill itself and stakeholder responses. It compares some of Victoria's EGM regulatory features with approaches in other states and territories. Finally, the paper explores some key issues around gambling, particularly EGMs, and presents a summary of the most recent statistics regarding Victorian gambling behaviour and losses to EGMs throughout the state. This paper does not represent legal opinion or legislative interpretation and is intended as a non-exhaustive overview of relevant topics only.

1 | Background

Electronic gaming machines

A ‘gaming machine’, under Victoria’s *Gambling Regulation Act 2003*, is defined as ‘any device, whether wholly or partly mechanically or electronically operated’ on which a person may play a game of chance or a game of mixed chance and skill in order to win money.¹⁰ The Act is the primary piece of legislation governing the establishment and operation of gaming machines in Victoria, except those in the Melbourne Casino (operated by Crown Melbourne and also known as Crown Casino), which are controlled under the *Casino Control Act 1991*.¹¹

Electronic gaming machines (EGMs) have long since succeeded analogue machines. Guidance from the Victorian Gambling and Casino Control Commission (VGCCC) uses the terms ‘gaming machine’, ‘electronic gaming machine’ and ‘poker machine’ (or pokies) synonymously.¹² In a broader context beyond Victoria, distinctions can be made between ‘gaming machines’ and ‘poker machines’, with poker machines being a subset of a larger range of electronic gaming machines operating around the world, including, for example, Pachinko, popular in Japan. However, according to an Australia Institute discussion paper from 2017, poker machines comprise about 99.8 per cent of all gaming machines in Australia—making the country an outlier in the take-up of this particular type of gambling.¹³

Australian EGMs are ‘seen internationally as sophisticated and successful at achieving their goal—attracting people to use them, and encouraging repeated expenditure’.¹⁴ A game traditionally involves people betting on the result of three or more ‘reels’, each containing a number of symbols such as cards or fruit, being ‘spun’. Today graphics simulate these reels spinning, but results are determined by a computerised random number generator.¹⁵

In Australia, gaming machines must conform with the *Australian/New Zealand Gaming Machine National Standard* (‘the national standard’). Each state or territory has its own appendix specifying how the national standard operates in its specific legislative and regulatory context.¹⁶ This may include settings such as return-to-player (RTP) percentages, maximum bet thresholds and credit load-up limits (see ‘Jurisdictional comparison’ section for this data and more). For instance, Victoria’s specifies that ‘when accumulated credits reach a value of \$1,000, the gaming machine must not accept any further cash input’.¹⁷ In Victoria, under the *Gambling Regulation Act*, a venue operator must apply for and purchase ‘entitlements’ through the VGCCC, each of which enables them to operate a single EGMs on a suitable premises.¹⁸ In addition, a local council will have limits on how many gaming machine entitlements can be held in its area, along with various compliance requirements.¹⁹

These EGM entitlements are capped at 30,000 across the state (including those in the Melbourne Casino). At publication, there are 27,372 EGM entitlements available across Victoria for clubs and hotels: 13,273 for club venue operators and 14,099 for hotel

¹⁰ *Gambling Regulation Act 2003*, p. 17.

¹¹ *Casino Control Act 1991*

¹² Victorian Gambling and Casino Control Commission (2024) ‘[Poker machine compliance](#)’, VGCCC website.

¹³ B. Browne & L. Minshull (2017) *Pokies pub test: Australia has most of the world’s pub and club poker machines*, December, Canberra, Australia Institute.

¹⁴ C. Livingstone (2017) *How electronic gambling machines work: EGM structural characteristics*, AGRC Discussion Paper 8, Canberra, Australian Gambling Research Centre (Australian Institute of Family Studies), July, p. 3.

¹⁵ *ibid.*, p. 3.

¹⁶ Livingstone (2017) *op. cit.*, July, p. 4.

¹⁷ Victorian Commission for Gambling and Liquor Regulation (2020) *Victorian Appendix to the Australian/New Zealand Gaming Machine National Standard* (CD/19.18117), version 2, Victorian Gambling and Casino Control Commission, August, section V6.13.

¹⁸ Department of Justice and Community Safety (2025) ‘[Gaming machine entitlements](#)’, DJCS website.

¹⁹ M. Kairouz, Minister for Consumer Affairs, Gaming and Liquor (2017) *Order under sections 3.2.4 and 3.4A.5(3A)*, Ministerial Order under the *Gambling Regulation Act 2003*, 20 September.

operators.²⁰ Not all of these entitlements are always being used by venues, and the number of actual EGMs operating in clubs and hotels varies across the year (see ‘Jurisdictional comparison’ and ‘Key issues’ sections). A premises can have up to 105 EGM entitlements, while club operators cannot hold more than 840 pokies entitlements.²¹ The Melbourne Casino holds entitlements for 2,628 gaming machines.²²

Revenue from EGMs directly influences the amount of tax a club or hotel operator must pay. According to the Victorian Department of Treasury and Finance, ‘Tax rates are based on a progressive scale that applies to each venue’s average monthly net gaming revenue (or player loss) per gaming machine’.²³ Club operators are entitled to tax concessions if they can prove that 8.33 per cent or more of their net gaming machine revenue is going towards their community (see ‘Community benefits from EGMs’ section below in ‘Key issues’).²⁴

EGMs in Victoria

EGMs are descendants of mechanical slot machines pioneered in the late 19th century by Californian mechanic Charles Fey, whose machine ‘The Liberty Bell’ was a purely mechanical contraption, made up of levers and gears, that paid out coins.²⁵ Following the invention’s initial popularity, imported slot machines, or ‘poker machines’, were reportedly operating illegally in Australia from the beginning of the 20th century.²⁶ However, no legal framework for poker machines was in place in any state until 1956, when New South Wales legalised the operation of poker machines as a way to recoup revenue lost to illegal gambling as well as drive income for venue operators looking to improve their facilities.²⁷

While some forms of gambling had been sporadically legalised across parts of the country prior to the legal operation of EGMs—betting on horse racing from the 1850s and state lotteries from 1916—spending on this form of gambling ‘rapidly exceeded’ spending on all other forms of gambling, meaning ‘clubs grew significantly in terms of assets, membership and facilities’.²⁸ Concerns about the ‘social implications of such widespread machine gambling and accusations of corruption and improper conduct’ meant that other jurisdictions delayed legalisation.²⁹

EGMs were an attractive investment for border-adjacent NSW businesses benefiting from communities in neighbouring Victorian and Queensland towns. The ACT—experiencing the loss of revenue from Canberra residents crossing the border to gamble—relented and legalised poker machines in 1976. Others would follow the ACT, including the Northern Territory, Queensland and South Australia, as the lure of profits lost to ‘cross-border leakage’ became apparent.³⁰

Victoria, by comparison, was a latecomer, followed only by Western Australia and Tasmania. By 1983 the increasingly complex computerisation of EGMs promised a greater degree of control for governments over gambling regulation. However, in that year, a report

²⁰ Department of Justice and Community Safety (2025) *op. cit.*

²¹ Victorian Gambling and Casino Control Commission (2025) ‘[Poker machine entitlements](#)’, VGCCC website.

²² Victorian Gambling and Casino Control Commission (2024) ‘[Casino](#)’, VGCCC website.

²³ Department of Treasury and Finance (Vic) (2024) *Electronic gaming machine tax review*, Melbourne, DTF, February, p. 6.

²⁴ Victorian Gambling and Casino Control Commission (2024) ‘[Community benefits statements](#)’, VGCCC website; Department of Treasury and Finance (Vic) (2024) *Electronic gaming machine tax review*, *op. cit.*, p. 8.

²⁵ M. Wilcox (1983) *Report of Board of Inquiry into Poker Machines*, chapters 1 to 5 of final report, Board of Inquiry into Poker Machines, Melbourne, November, paragraph 2.02.

²⁶ S. Pinto & P. Wilson (1990) *Gambling in Australia*, Trends and Issues in Crime and Criminal Justice, Canberra, Australian Institute of Criminology, July.

²⁷ Australian Institute for Gambling Research (University of Western Sydney) (1999), *Australian gambling: comparative history and analysis*, project report, prepared for Victorian Casino and Gaming Authority, Macarthur, AIGR, October, p. vi.

²⁸ *ibid.*, p. vi.

²⁹ *ibid.*, p. vi.

³⁰ *ibid.*, p. vi.

commissioned by Victoria's Cain government and delivered by Murray Wilcox QC ('the Wilcox report') overwhelmingly rejected the case for legalisation of EGMs, citing 'potential spread of organised crime, community criminal activity, as well as unacceptable business practices associated with the supply of machines'.³¹ Wilcox also thought it a 'certainty that some Victorians will use the machines to gamble to an extent which is beyond their financial capacity'.³²

However, tough economic conditions were on the horizon. Twin crises in 1990 included the collapses of the Pyramid Building Society and of the State Bank of Victoria.³³ These events, together with a declining industrial sector, forced John Cain to resign from his role of Premier.³⁴ Joan Kirner succeeded him, and the new government, among other measures, sought to revitalise the state's finances and tourism appeal with the aid of gaming machines.³⁵ Coinless EGMs were allowed in Tabaret facilities from 1990, with EGMs allowed in clubs and hotels in 1992; two 20-year licences were granted to Tattersall's and Tabcorp to purchase and maintain the machines.³⁶ Victoria's only casino, the Melbourne Casino ('the casino'), was opened in 1994.³⁷ EGMs have been met with particularly fierce backlash in this state since their approval for clubs and hotels, with Victoria in particular witnessing 'organised and sustained protests against the EGMs and government gaming policy'.³⁸

The disproportionate effect of EGMs within the community was felt almost immediately. Amid concern over problem gambling losses, regional rehabilitation centres, branded as BreakEven centres, were established in 1994.³⁹ A review in 1994 found that Tattersall's and Tabcorp had benefited the most financially from the introduction of gaming machines.⁴⁰ A 1998 Interchurch Gambling Taskforce noted that, 'due to market demands and gambling returns, EGMs are generally concentrated in lower socio-economic areas ... with many millions of dollars being pulled out of poorer communities', while another council-sponsored study in 1999 described EGM expenditures as 'individually and socio-geographically regressive'.⁴¹

The total number of Victorian EGMs was initially capped at 45,000, but in response to concerns this total was revised down to 27,500 in 1995, with the casino granted entitlements capped at 2,500.⁴² Partly in reaction to the perceived lack of regulation in New South Wales's EGM industry, 'both the Queensland and Victorian governments adopted a highly interventionist role in machine gaming policy', and it was noted in 1999 that, despite introducing EGMs in Victoria, the 'Kirner government went further than any Australian state and required research into the social and economic impacts of gambling, funded from gaming revenues'.⁴³ Following the expiration of the initial 20-year leases in 2012, the government moved away from the duopoly of Tattersall's and Tabcorp in favour of a 'venue operator model' which remains in place, wherein 'venues seeking to operate EGMs were required to purchase gaming machine entitlements, with each entitlement authorising its operation of a single EGM'.⁴⁴

³¹ *ibid.*, p. 175.

³² Wilcox (1983) *op. cit.*, p. 16 or 280.

³³ R. Dixon & S. Mann (1990) 'Victoria in crisis after Pyramid group collapse', *The Age*, 4 July; R. Dixon (1990) 'Victoria sells debt-laden State Bank', *The Age*, 27 August.

³⁴ Australian Institute for Gambling Research (University of Western Sydney) (1999) *op. cit.*, p. 152.

³⁵ C. Livingstone (2015) 'Pokies in Victoria: Joan Kirner's difficult legacy', *The Conversation*, 4 June.

³⁶ Australian Institute for Gambling Research (University of Western Sydney) (1999), *op. cit.*, p. 176.

³⁷ *ibid.*, pp. 159, 164.

³⁸ *ibid.*, pp. 180–81.

³⁹ *ibid.*, p. 164.

⁴⁰ *ibid.*, p. 177.

⁴¹ *ibid.*, p. 181; J. Doughney & T. Kelleher (1999) *The impact of poker machine gambling on low-income municipalities: a critical survey of key issues*, Maribyrnong City Council submission to inquiry into Australia's gambling industries, Canberra, Productivity Commission, p. 60.

⁴² Australian Institute for Gambling Research (University of Western Sydney) (1999) *op. cit.*, pp. 176, 178.

⁴³ *ibid.*, p. 178.

⁴⁴ Department of Treasury and Finance (Vic) (2024) *Electronic gaming machine tax review*, *op. cit.*, p. 4.

Calls to reduce gambling harm and deter money laundering

Research around gambling behaviour and gambling harm has been building in the decades since EGMs became widespread. Central to these discussions are pre-commitment systems and carded play, whether voluntary or mandatory.

Carded play

Carded play is in part aimed at limiting the use of EGMs for money laundering—‘moving money or property through the economy in a way that hides its illegal origins or intended criminal purpose’.⁴⁵ Concerns around criminal activity being associated with EGMs have been around since the Wilcox report.

In Victoria, the 2021 Royal Commission into the Casino Operator and Licence (‘the royal commission’), which was established to assess whether ‘Crown Melbourne is a suitable person to continue to hold the casino licence’, scrutinised these concerns in the context of the casino.⁴⁶ As a result, Commissioner Ray Finkelstein recommended that carded play be made compulsory at the casino, a measure that has since been introduced.⁴⁷ Finkelstein’s report pointed out that cash-dependent EGMs work in favour of criminal activity, given that ‘cash is an anonymous store of value and leaves no audit trail’.⁴⁸ He further explained the appeal of EGMs as offering:

... criminals an accessible way to launder smaller sums of criminal proceeds. Criminals may launder illicit cash through EGMs by claiming gaming machine payouts from legitimate players (that is, paying cash to a player who has accumulated credits and then requesting a cheque from the gaming venue in a sum equivalent to those credits) or by putting large amounts of cash or credits through an EGM and then converting the credits to cash in the payout voucher as ‘winnings’.⁴⁹

A NSW Crime Commission investigation in 2022 similarly highlighted EGMs as a money-laundering risk, finding that high load-up limits represented a ‘vulnerability because larger amounts of dirty money can be loaded into an EGM’.⁵⁰ Carded play has been identified as a barrier to these activities.

On the other hand, the Victorian Responsible Gambling Foundation (VRGF) has suggested that cashless gambling could create further problems for people who gamble due to the ‘frictionless nature of the transaction’.⁵¹ The foundation submitted to the royal commission that such methods encourage higher spending, while ‘cash transactions are felt as more painful (and less associated with reward)’.⁵² The VRGF suggests that existing harm reduction measures—such as when players are required to take physical breaks to access cash—could be rendered less effective by cashless play; however, it also said carded play could be beneficial if the measures were undertaken with ‘a harm prevention focus’.⁵³

⁴⁵ Australian Federal Police (unknown) ‘[Money laundering](#)’, AFP website.

⁴⁶ R. Finkelstein (2021) *Report of the Royal Commission into the Casino Operator and Licence, Volume 1*, final report, October, Melbourne, Royal Commission into the Casino Operator and Licence, p. 2 (paragraph 1).

⁴⁷ *ibid.*, p. 198.

⁴⁸ *ibid.*, p. 198.

⁴⁹ *ibid.*, p. 164.

⁵⁰ NSW Crime Commission (2022) *Project Islington: Inquiry into Money Laundering via Electronic Gaming Machines in Hotels and Clubs*, October, Sydney, NSW Crime Commission, p. 60.

⁵¹ Victorian Responsible Gambling Foundation (2021) ‘Submissions in response to the closing submissions of Counsel Assisting the Royal Commission into the Casino Operator and Licence’, Royal Commission into the Casino Operator and Licence, August, Melbourne, RCCOL, p. 23 (paragraph 10.3)

⁵² *ibid.*, p. 23 (paragraph 10.4).

⁵³ *ibid.*, pp. 23–24 (paragraphs 10.4–10.5).

Mandatory pre-commitment systems

Pre-commitment has also been a point of focus for policymakers. This type of system ‘involves a gambler setting limits on their gambling, such as a loss limit and a time limit before they commence gambling’.⁵⁴ The royal commission recommended ‘a full, mandatory, binding, pre-commitment system’ for casino EGM users.⁵⁵ Having explored the evidence base for pre-commitment systems in its report, the commission explained, ‘The issue of whether a player should be forced to set limits before they gamble is one of the most contentious issues in discussions about EGM reform’ and this argument ‘will never be fully resolved’.⁵⁶ However, the royal commission found agreement between the Productivity Commission and academic gambling experts that pre-commitment ‘is a strong, practicable and ultimately cost-effective option for harm minimisation’ and that ‘its use may need to be mandated to maximise the positive outcomes’.⁵⁷

Mandatory pre-commitment has been recommended for some years. The Productivity Commission recommended mandatory pre-commitment as early as 2010.⁵⁸ A 2011 federal parliamentary inquiry into mandatory pre-commitment for EGMs, chaired by independent Senator Andrew Wilkie, bolstered this view, with the committee recommending mandatory pre-commitment in its report.⁵⁹ In 2019, a literature review compiled for the NSW Responsible Gambling Fund found strong evidence to suggest that pre-commitment systems ‘have potential’, but that ‘players have to be motivated to use the system and to set appropriate limits’.⁶⁰ Other studies are also mentioned in the second reading speech (see ‘Second reading speech’ section, below).

The Victorian Government’s partial, voluntary, non-binding pre-commitment system, YourPlay, which started in December 2015, currently provides an avenue for people wanting to control their gambling losses in all contexts—both in the casino, and in clubs and hotels. It must be made available on all gaming machines, but is not compulsory to use.⁶¹ The royal commission assessed this system to be ‘not successful’.⁶² A YourPlay account, with loss and time limits, was made compulsory for people using EGMs in the casino from 14 December 2023 following recommendations from the royal commission.⁶³

Gambling reforms

In April 2022, the Government responded to the royal commission’s report, supporting the recommendations around minimising gambling harm and anti-money laundering measures in principle and indicating legislation was in the pipeline for 2023.⁶⁴ A number of measures have already been taken in an attempt to limit EGM harms within the community, including ‘carded play in EGM rooms based at the casino by the end of 2023 and the mandatory closure of EGM rooms in venues (apart from the casino) between 4 am and 10 am by mid-2024’.⁶⁵

⁵⁴ Finkelstein (2021) op. cit., p. 37.

⁵⁵ *ibid.*, p. 57.

⁵⁶ *ibid.*, p. 38.

⁵⁷ *ibid.*, p. 39.

⁵⁸ Productivity Commission (2010) *Gambling*, volume 1, Report no. 50, February, Canberra, Productivity Commission, p. 10.44;

⁵⁹ Parliamentary Joint Select Committee on Gambling Reform (2011) *The design and implementation of a mandatory pre-commitment system for electronic gaming machines*, first report, May, Canberra, The Committee, p. xi.

⁶⁰ Schottler Consulting (2019) *Literature review of the impact of EGM characteristics on gambling harm*, prepared for NSW Responsible Gambling Fund, Sydney, NSW Government, November, p. 6.

⁶¹ Department of Justice and Community Safety (date unknown) ‘YourPlay—Victoria’s pre-commitment scheme’, DJCS website.

⁶² Finkelstein (2021) op. cit., pp. 39–40.

⁶³ Department of Justice and Community Safety (date unknown) op. cit.

⁶⁴ Victorian Government (2022) ‘Victorian Government response to the Royal Commission into the Casino Operator and Licence Report’, Victorian Government website, 4 April.

⁶⁵ Public Accounts and Estimates Committee (2023) *Gambling and liquor regulation in Victoria: a follow-up of three Auditor-General reports*, inquiry report, November, The Committee, p. 63.

Measures contained in the Bill were first discussed in July 2023, under then-Premier Daniel Andrews. In a media release, Premier Andrews and the Minister for Casino, Gaming and Liquor Regulation, Melissa Horne, put forward a policy that included mandatory pre-commitment limits and carded play for EGMs, as well as a \$100 cap on load-up limits, down from the current \$1,000 cap.⁶⁶ The government also said it would slow the minimum spin rate to 3 seconds between games in order to limit losses.⁶⁷

In February 2024 the Victorian Department of Treasury and Finance released its *Electronic gaming machine tax review*, in which it acknowledged, ‘The reforms are designed to reduce gambling harm and are expected to put downward pressure on EGM turnover’.⁶⁸ While the outlook for EGM revenue was ‘uncertain’, the department predicted a reduction in EGM tax revenue from \$1.359 billion in 2023–24 to \$1.154 billion in 2026–27.⁶⁹

The Public Accounts and Estimates Committee’s November 2023 report *Gambling and liquor regulation in Victoria: a follow up of three Auditor-General reports* also recommended that the government ‘examine daily, weekly and annual gambling loss limits’ (recommendation 8). The government did not support this recommendation, but cited its July 2023 announcement that ‘all gaming venues in Victoria will require mandatory carded play with pre-commitment limits’.⁷⁰

2 | Second reading speech

The Gambling Legislation Amendment (Pre-commitment and Carded Play) Bill 2024 was introduced to the Legislative Assembly on 26 November 2024 by then-Minister for Casino, Gaming and Liquor Regulation, Melissa Horne.⁷¹ In the second reading speech, the minister said the Bill would introduce a ‘necessary legislative and regulatory framework for mandatory carded play and pre-commitment on electronic gaming machines’.⁷² Other significant amendments mentioned included the introduction of new minimum spin rates to EGMs in both clubs and hotels through amendments to the Gambling Regulation Act and the casino through amendments to the Casino Control Act.

The phased introduction of a compulsory carded play and pre-commitment framework through the Gambling Regulation Act is part of a broader suite of what the minister described as ‘landmark gambling reforms’.⁷³ Minister Horne cited the prevalence of gaming machines in the community and their pervasive effects—not just on the person who gambles, but also on their families, friends and loved ones.

The minister described carded play as a ‘simple concept’ that would ‘enable patrons to make better informed decisions about their spending’.⁷⁴ However, she acknowledged that while Victoria was the first to introduce voluntary carded play and pre-commitment for gaming machines, its voluntary nature was ‘stigmatising’ and required improvement.⁷⁵ To do this, a trial of a compulsory system would be conducted in some venues, providing insights for a full-scale rollout later in 2025.

⁶⁶ D. Andrews, Premier of Victoria (2023) [Landmark reforms to reduce gambling related harm](#), media release, 16 July.

⁶⁷ *ibid.*

⁶⁸ Department of Treasury and Finance (Vic) (2024) *op. cit.*, p. 4.

⁶⁹ *ibid.*, pp. 4, 8.

⁷⁰ Victorian Government (2024) ‘[Government response](#)’, Inquiry into gambling and liquor regulation in Victoria: a follow up of three Auditor-General reports, July, Melbourne, Public Accounts and Estimates Committee.

⁷¹ This portfolio has subsequently been transferred to Member for Northern Metropolitan Region, Enver Erdogan.

⁷² M. Horne, Minister for Casino, Gaming and Liquor Regulation (2024) ‘[Second reading speech: Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#)’, *Debates*, Victoria, Legislative Assembly, 27 November, p. 4809.

⁷³ *ibid.*

⁷⁴ *ibid.*

⁷⁵ *ibid.*

The second reading speech cited several studies conducted into gambling behaviour over the last decade, including:

- a 2017 report, *Pre-commitment systems for electronic gaming machines: preventing harm and improving consumer protection*, by the Australian Gambling Research Centre, which recommended a mandatory system;
- a 2019 paper, *Study of the impact of caps on electronic gaming machines*, by the University of Adelaide’s Centre for Economic Studies, which criticised the voluntary carded-play system;
- a June 2024 report, *Inquiry into cashless gaming in the ACT*, by the ACT’s Standing Committee on Justice and Community Safety, which recommended mandatory carded play; and
- a September 2024 report, *A better bet: how Australia should prevent gambling harm*, by the Grattan Institute, which recommended pre-commitment schemes for EGMs.⁷⁶

Further to this, the second reading speech noted the anticipated effects of reducing spin rates from 2.14 seconds to at least 3 seconds. This measure in the Bill, the minister said, would reduce the speed of play, thereby slowing down the rate at which people can lose money, but also slowing the rate at which criminals could launder money.⁷⁷

The speech indicated that a three-month trial of compulsory carded play would take place in mid-2025 across about 40 venues, with a view to applying carded play requirements statewide by December 2025. This would undergo evaluation before the end of 2026, when the ‘phasing out of “casual cards” will be considered’.⁷⁸ Further, the minister said that ‘changes to the currently non-binding pre-commitment limits’ would be considered when monitoring licence arrangements are renewed in late 2027.⁷⁹

3 | The Bill

The Bill seeks to amend the Gambling Regulation Act to enable a compulsory carded play and pre-commitment system. Amendments to the Gambling Regulation Act would not apply to EGMs in the Melbourne Casino, which is governed by separate legislation.

EGM users would be required to hold a ‘player account’ (defined in clause 3) for the purposes of the pre-commitment system.⁸⁰ A player account can be linked to a card as part of a loyalty scheme operating at a gaming venue. This card can be pre-loaded with money and must be inserted into an EGM in order to operate it. According to the explanatory memorandum, it is already a requirement that ‘a player card that is used for a loyalty scheme must also be able to access the pre-commitment system’.⁸¹

Clause 7 introduces mandatory carded play as ‘a means of identifying players’—via a linked player account—with the explanatory memorandum indicating that ‘enforcing requirements around their use is a way of preventing money laundering’.⁸² The onus would be on venue operators to ensure that cards are only provided to people whose identity has been registered and verified according to requirements which are yet to be prescribed in regulations or standards. The venue could be fined 120 penalty units for non-compliance,

⁷⁶ *ibid.*, p. 4809–10.

⁷⁷ *ibid.*, p. 4810.

⁷⁸ *ibid.*, p. 4809. ‘Casual cards’ allow a player to use a machine but do not require any identification requirements and do not require a player to set their own loss limits.

⁷⁹ *ibid.*

⁸⁰ [Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#), cl 3; Explanatory memorandum, [Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#), pp. 3–4.

⁸¹ Explanatory memorandum, [Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#), p. 3.

⁸² *ibid.*, p. 2.

equating currently to just over \$23,700.⁸³ Venue operators would be required to verify a player's identity prior to paying out credits of over \$2,000.⁸⁴

Clause 9 allows the relevant minister (currently the Minister for Casino, Gaming and Liquor Regulation) to compel loyalty scheme providers to provide information to the minister or the Victorian Gambling and Casino Control Commission, for the purposes of reconciling information with pre-commitment system data. This is to monitor compliance with the Act's provisions, with loyalty scheme providers potentially liable for 20 penalty units (approximately \$3,951) if they are found to be non-compliant.⁸⁵

Clause 16 provides for the power to make regulations regarding pre-commitment and carded play. Victoria currently has a load-up limit of \$1,000, and the government's media release indicated that it intends to lower this sum to \$100 from December 2025. Other procedures and measures able to be prescribed in regulations will include, but are not limited to:

- procedures for when player account equipment is unable to connect to a pre-commitment system;
- various procedures in relation to cards and carded play, including the issuing of cards, technical standards, the collection, storage, use and disclosure of data, the information to be provided to players, and the requirements or specifications for player cards;
- procedures for linking a player card to a person's identity and for verifying that identity; and
- requirements for verifying a person's identity when paying out winnings.⁸⁶

This clause also enables regulations to be made specifying time limits and net loss limits, as well as the consequences and options for people when they reach those limits.

Spin rates

Clauses 5 and 17 will respectively amend the Gambling Regulation Act and the Casino Control Act to ensure that minimum spin rates for EGMs across clubs, hotels and the casino increase from 2.14 seconds to 3 seconds. The entitlement holder or the casino operator will be liable for 20 penalty units if they are non-compliant.⁸⁷ This will apply to gaming machines approved for use by the VGCCC from either 1 December 2025 or a day declared by the minister.⁸⁸

Legal burdens for certain offences

Other amendments in the Bill, contained in clauses 4, 13 and 15, remove the legal burden on the accused to raise a defence in relation to a number of existing offences within the Gambling Regulation Act.⁸⁹ These include new exceptions in relation to:

- the offence of breaching a ban order in force under the Act;⁹⁰
- the offence of a sports betting provider accepting or facilitating betting on a contingency related to a prohibited event;⁹¹ and
- several offences relating to a minor being on gaming premises.⁹²

⁸³ [Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#), cl 7. The current value of a penalty unit in Victoria for FY 2024–25 is \$197.59; see: Department of Justice and Community Safety (2025) 'Penalties and values', DJCS website.

⁸⁴ [Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#), cl 6.

⁸⁵ *ibid.*, cl 9; DJCS (2025) *op. cit.*

⁸⁶ [Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#), cl 16.

⁸⁷ *ibid.*, cls 5, 17.

⁸⁸ *ibid.*, cls 5, 17.

⁸⁹ Explanatory memorandum, [Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#), cls 4, 13, 15.

⁹⁰ [Gambling Legislation Amendment \(Pre-commitment and Carded Play\) Bill 2024](#), cl 4.

⁹¹ *ibid.*, cl 13.

⁹² *ibid.*, cl 15.

4 | Stakeholder responses to the Bill

The Bill has drawn a mixture of responses.

Hume City Council welcomed the measures that ‘will give customers more control over how much they spend when using electronic gaming machines, reducing gambling harm’.⁹³ In expressing its support, the council noted that attempts to lessen the impact of EGMs in the community were particularly relevant to Hume: ‘In the 2023/24 financial year, communities across Hume City lost \$138 million to EGMs, the second highest recorded losses to EGMs for the municipality and the fourth highest in Victoria, a position it’s held for the last two consecutive financial years’.⁹⁴ In a press release, the council argued that the carded play provisions allowing players ‘to set limits on how much they are willing to lose’ directly addressed ‘the top concern for one-third of gamblers in Hume’.⁹⁵ Hume City mayor Jarrod Bell said that the Bill would also ‘go a long way in minimising the damage caused by unregulated gaming machine use’.⁹⁶

In December 2024, Russell Hooper, the then-Interim CEO of the Victims of Crime Commission, called the Bill ‘a major milestone in the delivery of major reforms which will reduce gambling harm in Victoria’, acknowledging it as ‘a complex reform’.⁹⁷

In the Parliament of South Australia, the Bill drew the attention of SA-Best Member of the Legislative Council Connie Banaros, who has introduced a Bill for mandatory pre-commitment into the South Australia Legislative Council. She questioned the South Australian Government on plans to introduce similar measures. She quoted Minister Horne’s claim that, despite fewer people gambling, those same people are ‘losing more than ever before’ and are likely to be situated in ‘our lowest socioeconomic areas’, adding that this could ‘accurately be used to describe the landscape of gambling addiction and poker machines in our own state’.⁹⁸ A response has not yet been tabled by the minister responsible, Andrea Michaels, who sits in the Legislative Assembly.

There has been some criticism, however, from within the industry. Community Clubs Victoria’s CEO Andrew Lloyd expressed concerns around the data underpinning the government’s proposal to roll out statewide measures that have been trialled in the casino:

From a project management perspective, you need to undertake an evaluation and ask: ‘Is Crown successful? Has it eradicated laundering? Has it addressed minimisation?’ before you continue trotting that out for hotels and clubs. So far, we haven’t seen any of that evaluation data, which is what needs to occur.⁹⁹

Lloyd also described the system’s introduction as ‘rushed’ and questioned the feasibility of rolling out a statewide technology overhaul, saying that it had not been done anywhere else in the world and that it would require a ‘massive IT project team’ and ‘some pretty high-level companies informing the build of it’.¹⁰⁰

The Australian Hotels Association’s Victorian branch said it would support the implementation of measures aimed at minimising harm and combatting money laundering. CEO Paddy O’Sullivan said the branch was ‘working with the Department, Government and

⁹³ Hume City Council (2024) *New state gambling reforms aim to reduce gaming losses in Hume*, media release, 2 December.

⁹⁴ *ibid.*

⁹⁵ *ibid.*

⁹⁶ *ibid.*

⁹⁷ R. Hooper (2024) ‘In huge news, the Victorian Government will introduce ...’, LinkedIn post, 26 November.

⁹⁸ C. Banaros (2024) ‘Statutes Amendment (Gambling – Mandatory Pre-commitment System) Bill’, *Debates*, Legislative Council, Parliament of South Australia, p. 6134; C. Banaros (2024) ‘Gambling reform’, *Debates*, Legislative Council, Parliament of South Australia, 28 November, p. 7608.

⁹⁹ A. Chanthadavong (2024) ‘Victoria to introduce carded play’, *Club Management*, 26 November.

¹⁰⁰ *ibid.*

industry to ensure the announced pilot delivers key insights around the use of technology to drive appropriate outcomes'.¹⁰¹

There have also been concerns raised by venue operators. Newport Social Club operator Tom Francis, also managing director of Francis Venues, was disappointed in the decision to continue with mandatory carded play, describing it as 'a fraught and problematic system', but said he looked forward to working with the government to achieve the best outcome.¹⁰² Meanwhile, Dylan Clark, managing director of Gippsland's Inverloch Esplanade Hotel, feared the proposal would drive away patrons, saying:

It's going to be challenging. The punters don't want it, especially our older punters. They don't like technology. Even trying to get them to sign up to the optional pre-commitment services available now, they're just not interested because it's an extra step, and it's too hard.¹⁰³

Further concerns from industry stakeholders include that the proposed changes will reduce gaming revenue and place additional pressure on venues already in financial distress, in turn impacting the community benefits venues can provide through income from gaming machines.¹⁰⁴

Outspoken gambling reform advocate Rev. Tim Costello AO mentioned the effect the royal commission had on the casino's approach to pokies and said that the Bill's proposed changes constituted a 'big breakthrough'.¹⁰⁵ Charles Livingstone, a researcher on gambling who has written specifically on the properties of EGMs, criticised the rollout timeframe, saying the current voluntary system, YourPlay, 'could be converted into a universal, mandatory system, literally overnight' and suggested that delaying a full-scale rollout was a move to 'placate the industry'.¹⁰⁶

Crown Melbourne, having already adjusted to similar reforms around mandatory carded play in December 2023, supported the Bill's extension of these measures to hotels and clubs, saying the company was 'well-placed to assist the government and industry as they work to establish a safer and more sustainable gaming environment throughout Victoria'.¹⁰⁷

5 | Other jurisdictions

Many jurisdictions have been discussing ways to reduce the impact of EGMs within the community. Table 1 compares Victoria's arrangements to other Australian jurisdictions. Different regulations tend to apply to EGMs in hotels and clubs and those in casinos, with further variation in numbers of EGMs, maximum credit balances and RTP percentages.

The RTP is the 'ratio of total wins (including progressives and other features) to the total turnover in a game cycle'.¹⁰⁸ In Victoria, this measurement is calculated by 'assessing the aggregated wagers and total returns paid to users over the course of a year for all EGMs operating within a specific venue'.¹⁰⁹ In other jurisdictions this may be calculated over the course of an EGM's game cycle (however long it takes for the number of potential outcomes to play out), which may take several years.¹¹⁰ The A/NZ standard also stipulates, 'The probability for attaining any advertised prizes and events must not be less than 1/7,000,000 (at a rate of at least 1 in 7 million plays)'.¹¹¹

¹⁰¹ *ibid.*

¹⁰² *ibid.*

¹⁰³ V. Cavasinni (2024) 'Victorian pubs under cloud of uncertainty around mandatory carded play', *Australian Hotelier*, 13 November.

¹⁰⁴ *ibid.*

¹⁰⁵ C. Jaeger & K. Rooney (2024) 'Pokies reforms hit parliament, but full rollout still three years away', *The Age*, 26 November.

¹⁰⁶ *ibid.*

¹⁰⁷ *ibid.*

¹⁰⁸ ANZ gaming machine working party (2021) *Australian/New Zealand Gaming Machine National Standard*, revision 11.1, Victorian Gaming and Casino Control Commission, February, p. 10.

¹⁰⁹ Livingstone (2017) *op. cit.*, p. 5. Also see *Gambling Regulation Act 2003*, s 3.6.1, p. 396.

¹¹⁰ Livingstone (2017) *op. cit.*, p. 5.

¹¹¹ ANZ gaming machine working party (2021) *op. cit.*, p. 64.

Table 1: Jurisdictional comparison of electronic gaming machine regulation

State or territory	Venue type	Number of gaming machines operating	Maximum credit balance ¹¹²	Maximum wager permitted ¹¹³	Minimum acceptable RTP ratio (per cent)	Maximum win from single play	Status of carded play
Victoria ¹¹⁴	Clubs and hotels	12,658 (Clubs) 13,626 (Hotels) (December 2024)	\$1,000 (Proposed: \$100)	\$5	85 per cent	\$10,000	Proposed: Mandatory carded play by end of 2025 across all EGM venues
	Casinos	2,628 entitlements but operating numbers may vary	\$9,949	\$10 (unless the game is operating in unrestricted mode in a specified area)	87 per cent	Not specified	
New South Wales ¹¹⁵	Casinos, clubs and hotels	65,216 (Clubs) (August 2024) 22,146 (Hotels) (September 2024) 1,500 (casinos)	\$500 (introduced on 1 July 2023, down from \$5,000)	\$10 (\$100 on multi-terminal gaming machines)	85 per cent	\$10,000	Cashless gaming has been trialled at a selection of hotels and clubs; Star Casino implemented cashless play from 19 August 2024.

¹¹² Defined as 'The maximum credit balance which may exist on a gaming machine or account beyond which a note acceptor must be disabled due to a High Credit Balance condition'; ANZ gaming machine working party (2021) op. cit., p. 82.

¹¹³ Defined as the 'Maximum wager permitted in a gaming machine game'; ANZ gaming machine working party (2021) op. cit., p. 82.

¹¹⁴ Victoria sources: ANZ gaming machine working party (2021) op. cit.; Public Accounts and Estimates Committee (2023) op. cit., pp. 62–63; Victorian Gambling and Casino Control Commission (2025) *Electronic Gaming Machine LGA Level Expenditure*, Melbourne, VGCCC; Victorian Gambling and Casino Control Commission (2025) 'Casino', VGCCC website.

¹¹⁵ New South Wales sources: ANZ gaming machine working party (2021) op. cit.; Public Accounts and Estimates Committee (2023) op. cit., pp. 62–63; Liquor and Gaming NSW (2025) *Clubs: Gaming Machine Quarterly Report by Local Government Area (LGA) for the Period 1 June 2024 to 31 August 2024*, Sydney, LGNSW; Liquor and Gaming NSW (2025) *Hotels: Gaming Machine Quarterly Report by Local Government Area (LGA) for the Period 1 July 2024 to 30 September 2024*, Sydney, LGNSW; Liquor & Gaming NSW (2023) *Cash input limits for electronic gaming machines to be reduced*, media release, 23 June; Liquor & Gaming NSW (2023) op. cit.; Liquor & Gaming NSW (2024) 'NSW cashless gaming trial', LGNSW website.

State or territory	Venue type	Number of gaming machines operating	Maximum credit balance	Maximum wager permitted	Minimum acceptable RTP (per cent)	Maximum win from single play	Status of carded play
Queensland ¹¹⁶	Clubs and hotels	21,158 (Clubs) 19,108 (Hotels) (December 2024)	\$100	\$5	85 per cent	Set by licensed operator	Proposed: All EGMs cashless by 2028
	Casinos	3,571	Casinos set the amount for their EGMs	Not specified	85 per cent	Set by casino	
South Australia ¹¹⁷	Clubs and hotels	1,041 (Clubs) 10,751 (Hotels) (December 2024)	\$99.99	\$5	87.5 per cent	\$10,000	N/A
	Casinos	0 active (1054 entitlements) (December 2024)	\$99.99	\$5 (excluding 'Premium' gaming areas)	87.5 per cent	\$10,000 (excluding 'Premium' gaming areas)	
Western Australia ¹¹⁸	Casinos	2,500 entitlements but operating numbers may vary	\$100	\$10	90 per cent	\$10,000	Plans (as of June 2023) to introduce weekly loss and time limits and mandatory carded play

¹¹⁶ Queensland sources: ANZ gaming machine working party (2021) op. cit.; Public Accounts and Estimates Committee (2023) op. cit., pp. 62–63; Queensland Government (2025) 'EGM range statistics for clubs', Queensland Government website; Queensland Government (2025) 'EGM range statistics for hotels: December 2024', Queensland Government website.

¹¹⁷ South Australia sources: ANZ gaming machine working party (2021) op. cit.; Public Accounts and Estimates Committee (2023) op. cit., pp. 62–63; Consumer and Business Services (Government of South Australia) (2025) *Gaming machine licence statistics—quarter 2, 2024/25*, Adelaide, Government of South Australia.

¹¹⁸ Western Australia sources: ANZ gaming machine working party (2021) op. cit.; Public Accounts and Estimates Committee (2023) op. cit., pp. 62–63; Department of Local Government, Sport and Cultural Industries (WA) (2023) 'Gaming and wagering commission', DLGSC website, 26 July.

State or territory	Venue type	Number of gaming machines operating	Maximum credit balance	Maximum wager permitted	Minimum acceptable RTP (per cent)	Maximum win from single play	Status of carded play
Tasmania ¹¹⁹	Casinos, clubs and hotels	2,264 (Clubs and hotels) (December 2024) 988 (Casinos) (December 2024)	Not applicable for hotels and clubs; \$500 (casinos)	\$5	85 per cent	Not specified	Plans for cashless play deferred
Australian Capital Territory ¹²⁰	All venues	3,565 (December 2024)	Not specified	\$10	87 per cent	Not specified	Undertaken to follow NSW development regarding cards
Northern Territory ¹²¹	Clubs and hotels	1,659	\$1,000	\$5	85 per cent	Set by Licensed Monitoring Provider	N/A
	Casinos	1,080	Not specified	No limit	85 per cent	No limit	

¹¹⁹ Tasmania sources: ANZ gaming machine working party (2021) op. cit.; Public Accounts and Estimates Committee (2023) op. cit., pp. 62–63; Department of Treasury and Finance (Tas) (2025) ‘[Gaming and wagering industry data](#)’, Tasmanian Government website; L. MacDonald (2024) ‘[Gaming commissioner pleads for ‘common sense’ after Tasmanian government pauses cashless card system rollout](#)’, *ABC News Online*, 20 November.

¹²⁰ ACT sources: ANZ gaming machine working party (2021) op. cit.; Public Accounts and Estimates Committee (2023) op. cit., pp. 62–63; Gambling and Racing Commission (ACT Government) (2025) [Gaming machine reform package—trading scheme information provided as at 1 December 2024](#), January, Canberra, ACT Government.

¹²¹ Northern Territory sources: ANZ gaming machine working party (2021) op. cit.; Public Accounts and Estimates Committee (2023) op. cit., pp. 62–63.

6 | Key issues

Community benefits from EGMs

While there is broad community opposition to EGMs within the community, they are also entrenched within hotels and clubs as a valued source of revenue for governments, venue operators and other community institutions.

According to the Victorian Government's *Electronic gaming machine tax review*, the taxation settings for EGMs differ from most taxes in that 8.33 per cent of EGM revenue goes not into the government's Consolidated Fund but directly into the government's Community Support Fund, with the remainder going into the Hospitals and Charities Fund and the Mental Health Fund. This means this revenue must be spent on things such as 'hospitals and community organisations, mental health services, programs to tackle problem gambling, as well as drug education, treatment, and rehabilitation'.¹²²

Operators who apply for EGM entitlements must do so while considering the direct and indirect effect EGMs may have within the community. Studies suggest that effects, direct and indirect, may be felt in a variety of ways. A 2011 Queensland University of Technology (QUT) study on the socioeconomic impact of EGMs in Victoria, commissioned by the Victorian Office of Gaming and Racing, highlighted a few of these:

- **Employment:** employment may be created through EGMs, but it may also come at the expense of employment in other local industries or rival businesses.
- **Competition:** income to other industries and businesses may be impacted by money spent instead on EGMs.
- **Dependence:** employers and governments may build an overreliance on EGMs for revenue, taxes or jobs, potentially at the expense of other revenue sources and with indirect impacts on other industries and employers within the community.¹²³

Other effects may include impacts on tourism and trade—those coming in to gamble or those leaving to gamble elsewhere. Communities might also consider the balance of resources coming in via gambling expenditure (for example, community benefits contributions) versus the resources being taken up due a result of EGM-generated changes in behaviour, such as in addressing health issues and crime.¹²⁴ The QUT study did, however, find a range of benefits from retaining EGMs in smaller clubs. It states:

These benefits include a contribution to community social capital and the provision of voluntary opportunities for community members. Both benefits are identified as strong mitigating factors to the harmful effects of EGM gambling.¹²⁵

The VGCCC publishes its decisions on applications for adding or amending EGM entitlements at certain premises. In these applications, premises are required to justify the community benefits that they may contribute as a result of patrons' gambling output. One recent successful application from Hotel 520 on Sayers in Tarneit claimed that 12 extra EGMs would contribute as much as \$125,000 per annum to 'not-for-profit community groups and sporting organisations providing services and facilities to residents within the City of Wyndham'.¹²⁶ A separate application by Doxa Community Club Incorporated (a venue operator) for five extra EGMs at the Clocks venue at Flinders Street Station indicated the machines would

¹²² Department of Treasury and Finance (Vic) (2024) op. cit., p. 3.

¹²³ K. Brown et al. (2011) *Socio-economic impacts of access to EGMs in Victoria: Effects on demand and communities*, prepared for the Office of Gaming and Racing (Victorian Department of Justice), December, Melbourne, Department of Justice, p. 19 (Table 2).

¹²⁴ *ibid.*, p. 19.

¹²⁵ *ibid.*, p. 9.

¹²⁶ Victorian Responsible Gambling Foundation (2023) 'Commission approves additional 12 pokies at Hotel 520 on Sayers', VRGF website, 8 December.

contribute \$25,000 per annum to the Salvation Army's homelessness work in the City of Melbourne.¹²⁷

Sometimes these applications are refused. This can be done on a number of grounds, including those set out in section 3.3.7(1) of the Gambling Regulation Act, which stipulates that the VGCCC must not approve an application if the applicant has no authority to apply for EGMs at a certain premises, the premises are unsuitable and there is a net economic or social detriment to the wellbeing of the community.¹²⁸ An application by the Romsey Football Netball Club for 50 EGMs at the Romsey Community Hotel, for example, was opposed by the Macedon Ranges Shire Council and was ultimately refused by the VGCCC on the grounds that proposed EGMs represented 'a net detriment to the well-being of the community in the Macedon Ranges Shire'.¹²⁹ The main impacts cited were 'the provision of new gaming and entertainment facilities, contributions to the community, community attitude to the Application, and gambling harm'.¹³⁰

Destigmatising gambling harm

Recent communications from the VRGF have cast a spotlight on the realities of gambling harm and the stigma it carries. The VRGF has attempted to normalise more respectful forms of language when referring to people who gamble and the harm that this causes.

A recent document, the *Gambling harm language guide*, released in March 2024, provides guidance on language used when discussing gambling issues, people who gamble, problem gambling and gambling harm. The guide distinguishes seven categories of harm: financial, relationship difficulties, health problems, emotional and psychological distress, issues at work or study, cultural stresses and criminal activity.¹³¹ The paper points to work published by the VRGF in 2017 calculating the social cost of gambling to be \$7 billion a year.¹³² These impacts are also felt close to home; the *Victorian population gambling and health study 2023* found that about 1 in 10 Victorians who were in a close relationship with someone who gambled were personally affected by that person's gambling, equating to an estimated 253,000 Victorians.¹³³

The VRGF differentiates 'problem gambling', behaviours that can lead to negative consequences, from 'gambling harm', a measure of the reduced wellbeing (of both the person who gambles and others) that can result from gambling.¹³⁴ The foundation uses the example of referring to 'a person who gambles' rather than a 'gambler', given that 'problem gambler' may imply that someone *is* a problem. Language like 'who struggles with gambling' or 'experiences gambling harm', however, instead indicate someone *having* a problem.¹³⁵ This is primarily intended to reduce the potential impact of 'unconscious bias or ignorance about negative connotations'.¹³⁶

The foundation has also adopted the Problem Gambling Severity Index, which illustrates the distinction between different gambling behaviours according to gambling harm (Table 2).

¹²⁷ Victorian Responsible Gambling Foundation (2024a) '[Commission approves additional five pokies at Clocks at Flinders Street Station](#)', VRGF website, 9 April.

¹²⁸ *Gambling Regulation Act 2003*

¹²⁹ Victorian Gambling and Casino Control Commission (2024) [Decision and reasons for decision](#), decision on application by the Romsey Football Netball Club Inc., July, VGCCC, paras 78, 160.

¹³⁰ *ibid.*

¹³¹ Victorian Responsible Gambling Foundation (2024) [Reducing stigma: a guide for talking about gambling harm](#), March, Melbourne, VRGF, p. 4.

¹³² M. Browne et al (2017) [The social cost of gambling to Victoria](#), Melbourne, Victorian Responsible Gambling Foundation, p. 2.

¹³³ A. Suomi et al. (2024) [Victorian population gambling and health study 2023](#), final report, Melbourne, Victorian Government, September, pp. iii, 113.

¹³⁴ Victorian Responsible Gambling Foundation (2024) [Reducing stigma](#), op. cit., p. 6.

¹³⁵ *ibid.*, p. 6.

¹³⁶ *ibid.*, p. 6.

Table 2: The Problem Gambling Severity Index adopted by the Victorian Responsible Gambling Foundation¹³⁷

Problem Gambling Severity Index (PGSI)		
Type of gambling	Proportion of population	Description
Non-problem gambling	44.8% (approx. 2.3 million)	People who vary in the frequency with which they gamble and the amount of time and money they spend, but who experience no negative consequences ¹³⁸
Low-risk gambling	5.3% (approx. 273,000)	People who experience minor negative consequences, such as very occasionally spending over their limit or feeling guilty about gambling ¹³⁹
Moderate-risk gambling	2.3% (approx. 117,000)	People who sometimes experience negative consequences from their gambling, such as spending more than they can afford, losing track of time or feeling guilty about gambling ¹⁴⁰
Problem gambling	0.9% (approx. 47,000)	People who are likely to gamble heavily and may have lost control. They experience severe negative consequences from their gambling, such as frequently spending more than they can afford, chasing their losses and feeling stressed ¹⁴¹

Gambling harm

The social harms of EGMs have been persistent since their inception. The observation that gambling harm stemming from EGMs appears most pronounced in areas of socioeconomic disadvantage has been made often. Most recently, the parliamentary Public Accounts and Estimates Committee's November 2023 report *Gambling and liquor regulation in Victoria: a follow up of three Auditor-General reports* made the observation again, highlighting significant losses in the local government areas of Greater Dandenong, Brimbank and Hume.¹⁴² Further, with gambling player losses amounting to \$7.39 billion across the state in 2023–24, EGM losses in hotels and clubs constituted the largest chunk, making up about 41 per cent of total gambling losses in the state (\$3.03 billion) (see Figure 3).¹⁴³

EGMs and gambling harm

Pre-commitment systems for EGMs have been the focus of debate in state and federal policy circles for many years. A notable push was made by independent Senator Andrew Wilkie when he spearheaded the federal Parliamentary Joint Select Committee on Gambling Reform, which released its first report in May 2011: *The design and implementation of a mandatory pre-commitment system for electronic gaming machines*.

The report noted the damage of EGM addiction, not only to the person who gambles but the people with whom they have relationships—family and friends—due to the 'intensity and ready availability of EGMs' and recognition of this activity as 'the riskiest form of gambling'.¹⁴⁴ The committee also stated 'EGM addiction has resulted in children going hungry, family breakdowns, homes and businesses lost, relationships damaged and, most tragically,

¹³⁷ *ibid.*, p. 6; A. Suomi et al. (2024) *op. cit.*, p. 51. Note that proportion percentages and number estimates have been updated to 2023 estimates.

¹³⁸ *ibid.*, p. 6.

¹³⁹ *ibid.*, p. 6.

¹⁴⁰ *ibid.*, p. 6.

¹⁴¹ *ibid.*, p. 6.

¹⁴² Public Accounts and Estimates Committee (2023) *op. cit.*, p. 26.

¹⁴³ *ibid.*, p. 32.

¹⁴⁴ Parliamentary Joint Select Committee on Gambling Reform (2011) *op. cit.*, p. xi.

suicide'.¹⁴⁵ The committee pushed for mandatory pre-commitment as a way of 'encouraging all players to make rational and conscious decisions about their gambling'.¹⁴⁶

A more recent study of EGM environments conducted by the VRGF in April 2024 stated, 'Demographic factors associated with experiencing problem gambling included younger age, lower income and being unemployed or in casual or part-time employment'.¹⁴⁷ The study identified issues with these problems being addressed at venues, finding that while staff were 'generally confident in their ability to identify and respond to harm', the least confident were 'younger and less experienced staff' who 'tended to have the greatest exposure, due to factors like their role and the times they usually work'.¹⁴⁸ The report found, 'These staff cited worries including negative responses from customers, saying the wrong thing, and making an incorrect judgement as barriers to intervening'.¹⁴⁹

Conditioning elements of gaming machine design

The emphasis on pre-commitment systems helping people who gamble on EGMs to develop conscious decision-making has in part been prompted by research into the psychological characteristics of game design and its effect on user behaviour. EGMs display conditioning features designed to attract people to play continuously, leading in some cases to addiction.¹⁵⁰ This conditioning takes two forms:

- **Operant conditioning:** a 'psychological concept related to the provision of an irregular, variable or random schedule of reinforcement—that is, of rewards or "prizes"', which are programmed into an EGM's game maths to keep people playing.¹⁵¹ The game maths may incentivise longer play through a programmed combination of volatility of game outcome, frequency and structure of awards over time, and advertised jackpots.¹⁵²
- **Classical conditioning:** This can be traced back to Russian neurologist Ivan Pavlov's theories on conditioned learning, which suggest that humans, like other animals, 'will learn to associate favourable and rewarding outcomes or events with specific physiological stimuli'.¹⁵³ EGMs are designed to condition players by delivering rewards through a combination of messages, melodies, animations, graphics and audio and lighting effects that encourage further play, with strong evidence suggesting players are led to believe 'winning on an EGM is more common than losing and may serve to reinforce gambling behaviour'.¹⁵⁴

A 2019 report commissioned by the NSW Responsible Gambling Fund also highlighted the contribution that the speed of play has on losses, as well as the phenomenon of 'losses disguised as wins' (LDWs). The authors found emerging evidence to suggest that 'EGMs with higher spin rates may be associated with increased spending, higher bets and impaired recall of wins'.¹⁵⁵ The report also found that 'LDWs are highly prevalent in Australian EGMs, with around 18% of spins resulting in an amount won that was less than the amount bet'.¹⁵⁶

Factors such as music and LDWs have also been the subject of multiple studies, finding that they can lull people who gamble—but EGM users in particular—into a state of dissociation.¹⁵⁷ This was also highlighted in the 2010 Productivity Commission's report, *Gambling*, which cited

¹⁴⁵ *ibid.*, p. xi.

¹⁴⁶ *ibid.*, p. xi.

¹⁴⁷ L. Duffy (2024) *Electronic gaming machine environment study—Wave 2 summary*, Melbourne, Victorian Responsible Gambling Foundation, April, p. 2.

¹⁴⁸ *ibid.*, p. 2.

¹⁴⁹ *ibid.*, p. 2.

¹⁵⁰ Livingstone (2017) *op. cit.*

¹⁵¹ *ibid.*, p. 8.

¹⁵² *ibid.*, pp. 8–9.

¹⁵³ *ibid.*, p. 9.

¹⁵⁴ Schottler Consulting (2019) *op. cit.*, p. 6.

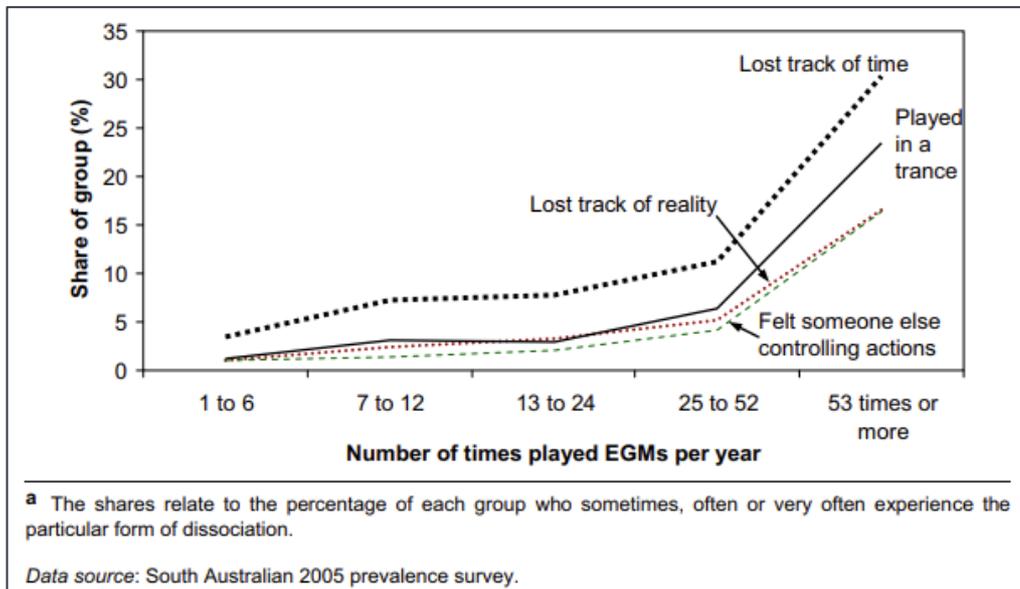
¹⁵⁵ *ibid.*, p. 6.

¹⁵⁶ *ibid.*, p. 17.

¹⁵⁷ *ibid.*, pp. 63–64, 107.

a 2005 South Australian study in showing that this dissociation effect was found to increase as EGM usage increased (Figure 1).¹⁵⁸

Figure 1: Dissociation and its increasing prevalence among people who play EGMs more often, from a 2005 South Australian prevalence survey (via the Productivity Commission)¹⁵⁹



There is an environmental element to the harming effect of EGMs as well. The Productivity Commission commented on Victoria’s combination of gaming venues—comprising clubs and hotels and the casino—being a key contributor to gambling harm.¹⁶⁰ The Australasian Casinos Association makes the distinction between the casino being a ‘destination venue’ and local clubs and hotels being ‘convenience venues’, leading to a higher risk factor for people gambling at local clubs and hotels due to lower barriers to access, among other factors.¹⁶¹ Noting gambling’s pervasive impact throughout the community, the commission found that the ‘adverse health, emotional and financial impacts on many more people than those categorised as ‘problem gamblers’ mean that ‘policy also needs to address these wider impacts’.¹⁶²

Impacts of gambling and EGMs within Victoria

Who is gambling?

Statistics on gambling behaviour in Victoria show a marked decline in gambling overall, but harms are still prevalent and concerning in particular areas. In 2018–19, as a general measure of gambling activity across all forms (EGMs, sports betting, lotteries, raffle tickets etc.), 69 per cent of adult Victorians (over 18 years of age) were found to have gambled in the 12 months leading up to being surveyed.¹⁶³ That number has come down significantly, to 53.3 per cent in 2023 (approximately 2.77 million people).¹⁶⁴ Figure 2 charts this and other trends over the past four Victorian population gambling and health surveys. People in regional Victoria were more likely to gamble than those in metropolitan Victoria (62.3 per cent and 50.4 per cent, respectively).¹⁶⁵

¹⁵⁸ Productivity Commission (2010) op. cit., p. 4.18.

¹⁵⁹ *ibid.*, pp. 4.15–4.16.

¹⁶⁰ *ibid.*, pp. 4.30–4.31.

¹⁶¹ *ibid.*, p. 4.31.

¹⁶² *ibid.*, p. 4.37.

¹⁶³ Suomi et al. (2024) op. cit., p. 9.

¹⁶⁴ *ibid.*, p. 20.

¹⁶⁵ *ibid.*, p. 21.

Only a fraction of Victorian adults, about one in ten, can be described as experiencing ‘gambling harm’ or a reduction in wellbeing from gambling activity.¹⁶⁶ The VRGF estimated through its *Victorian population gambling and health study 2023* that, as of 2023, 0.9 per cent of Victorian adults experienced problem gambling, up from 0.7 per cent in 2018–19.¹⁶⁷ However, only 7.6 per cent demonstrated ‘low-risk’ and ‘moderate-risk’ gambling behaviours, down from 9.1 per cent in 2018–19.¹⁶⁸ So while less people are experiencing harm, a greater proportion of people are experiencing more severe gambling harm.

Trends in EGM gambling

Those most likely to experience gambling harm were people who gambled on casino table games (36 per cent), followed by sports (including online betting) (35 per cent), bingo (32 per cent) and EGMs (29 per cent).¹⁶⁹ People who engaged in problem gambling were also more likely to spend longer on EGMs, particularly at clubs and hotels, with the 2023 gambling and health study stating that:

... over half of individuals in the problem gambling category who were gambling on EGMs at pubs, clubs or hotels spent 3 hours or longer gambling on EGMs compared with one in 3 in the moderate-risk and nearly one in 5 in the low-risk gambling category. Only one in 20 individuals in the non-problem gambling category spent 3 hours or longer on EGM gambling at pubs, clubs or hotels.¹⁷⁰

However, encouraging these people to seek help is challenging. According to the same report, despite good awareness of gambling support services available, ‘Just under a quarter of those experiencing problem gambling sought help for their gambling in the last year’.¹⁷¹

Out of all Victorian adults in 2023, only 10.7 per cent used EGMs (down from 21.5 per cent in 2008).¹⁷² It was the fourth most common gambling activity behind lotteries (37.6 per cent), raffles (20 per cent) and horse, harness and greyhound racing (12.9 per cent).¹⁷³ Older age groups were less likely to gamble on EGMs, but those living outside of Melbourne were more likely to use them; those speaking a language other than English at home were significantly less likely to use EGMs, as were people who had post-school education, including tertiary qualifications.¹⁷⁴

Some experts have expressed concern over the study’s finding that younger patrons, particularly men between 18 and 24, have taken to EGMs, with 16.5 per cent of that cohort having used pokies in the 12 months prior to the survey. Charles Livingstone said that with young people already under considerable stress—both financial and mental—this cohort is particularly vulnerable to the dangers of EGMs. ‘Pokies offer solace to people in dire straits,’ he said, adding, ‘If there is anyone in dire straits, it is young people’.¹⁷⁵ Other experts, such as Dr Simone McCarthy from Deakin University and Kate Seselja, co-chair of advocacy group Gambling Harm Lived Experience Experts, discussed the idea of EGMs as a ‘rite of passage’ upon turning 18. Seselja said, ‘That kind of normalisation really does influence how young people view gambling. They have positive associations with it. It’s seen as very social, even though it’s often something that you’ll do in isolation’.¹⁷⁶

On the whole, EGM usage has been declining slowly, consistent with the general declining trend in gambling, across the last 16 years (Figure 2).

¹⁶⁶ Victorian Responsible Gambling Foundation (2024) *Reducing stigma*, op. cit., p. 6.

¹⁶⁷ Suomi et al. (2024) op. cit., p. 62.

¹⁶⁸ *ibid.*, p. 62.

¹⁶⁹ *ibid.*, p. iii.

¹⁷⁰ *ibid.*, p. 58.

¹⁷¹ *ibid.*, p. iv.

¹⁷² *ibid.*, p. 28.

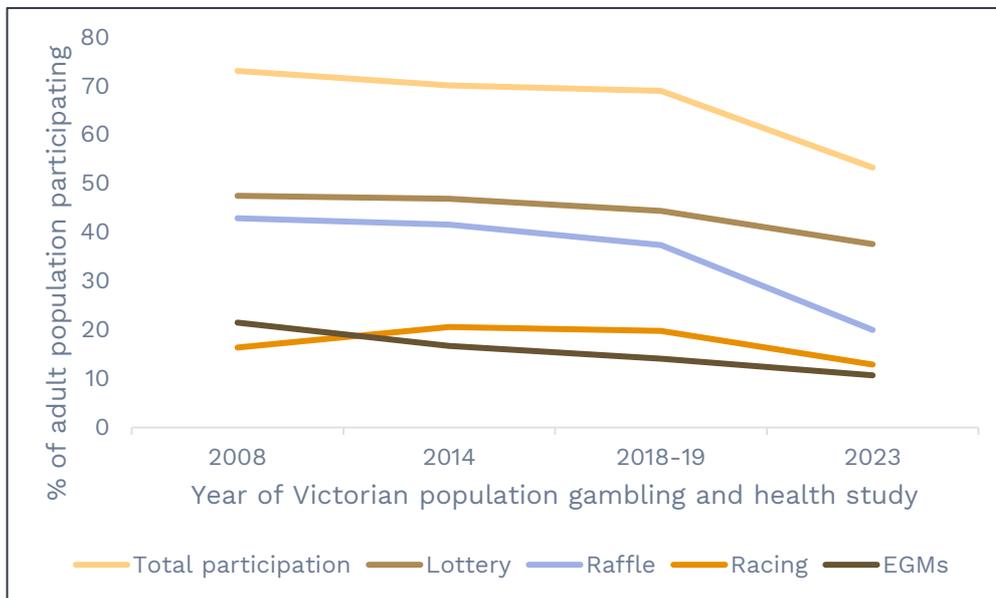
¹⁷³ *ibid.*, p. 28.

¹⁷⁴ *ibid.*, pp. 25–26.

¹⁷⁵ C. Waters (2025) ‘Part of turning 18’: More young people are getting hooked on pokies’, *The Age*, 27 January.

¹⁷⁶ *ibid.*

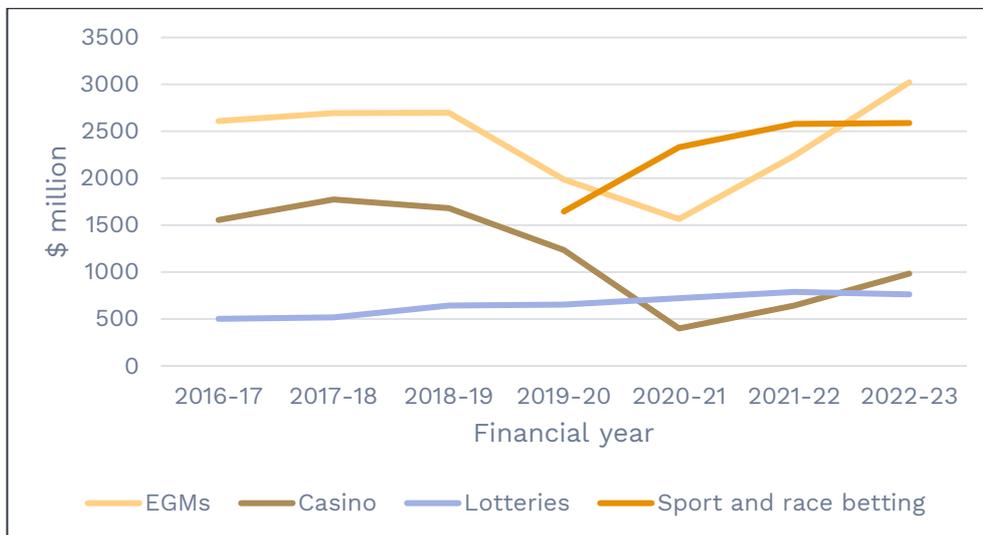
Figure 2: Victorian gambling activity participation: percentage of total adult population who gambled (including all gambling types) and percentages of adult population who gambled on the four most common gambling types, 2008–23¹⁷⁷



Data source: Victorian population gambling and health study 2023

Note: Not pictured are percentages of Victorian adults who gambled on scratch cards (9.1 per cent in 2023, down from 15.3 per cent in 2008), on sports (not racing) (5.1 per cent, up from 4 per cent), at the casino (4.7 per cent, up from 4.6 per cent) and on Keno (2.1 per cent, down from 2.3 per cent).

Figure 3: Total losses by Victorian adults who gamble, by form of gambling, 2016–17 to 2022–23 (not adjusted for inflation)¹⁷⁸



Data source: Victorian Gambling and Casino Control Commission (via Victorian Responsible Gambling Foundation (2024) ‘Expenditure on gambling in Victoria’, VRGF website)

EGMs continue to have an outsized impact in terms of player losses. EGM losses have consistently been higher than losses from any other form of gambling, except for during the COVID-19 pandemic when EGM losses were briefly overtaken by losses to sport and race betting (see Figure 3). More recent statistics indicate that people lost \$3.03 billion on EGMs (in clubs and hotels) in 2023–24, compared to \$950 million in casinos (which include casino

¹⁷⁷ Suomi et al. (2024) op cit., p. 28.

¹⁷⁸ Victorian Responsible Gambling Foundation (2024) ‘Expenditure on gambling in Victoria’, VRGF website.

EGMs and table games) and \$846 million in lottery losses; sports betting and wagering had been on the rise, but plateaued at \$2.514 billion in losses in 2023–24.¹⁷⁹

Where are the EGMs?

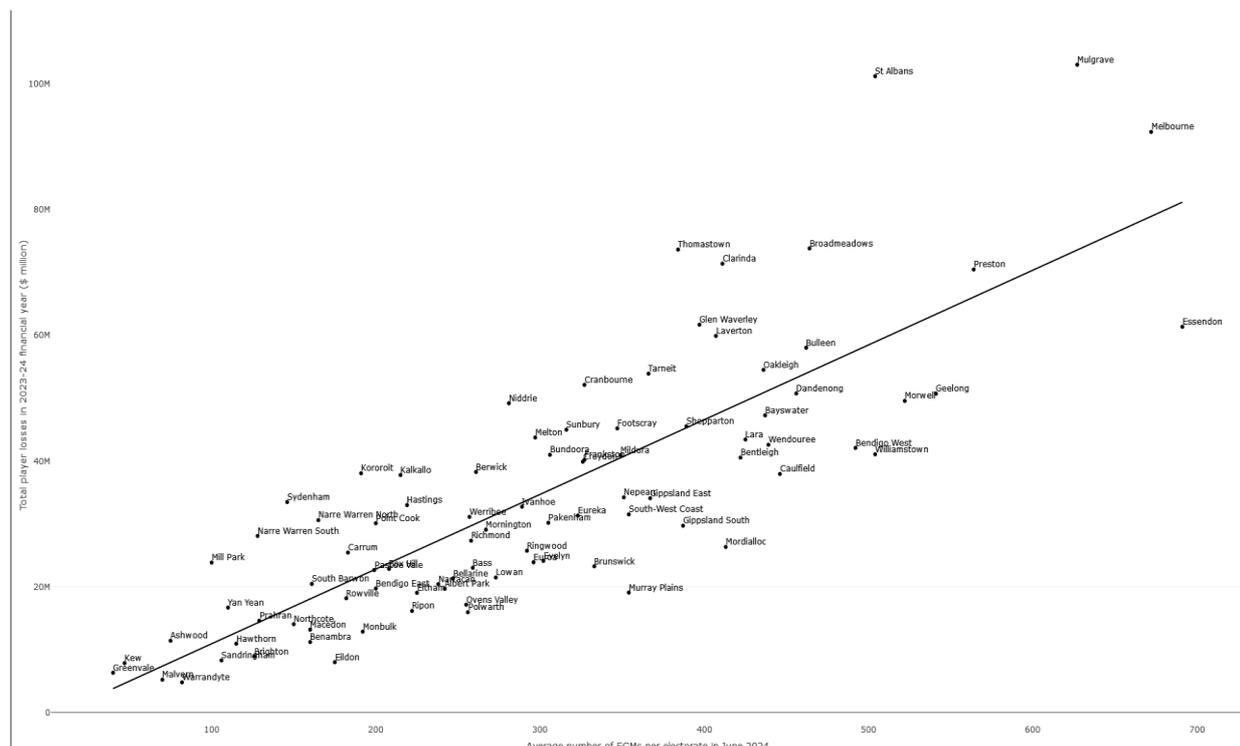
Large losses on EGMs can be attributed to the easy access to gaming machines within the community, with almost 27,000 machines operating across the state. Of the Victorian adults who gambled on EGMs in the year leading up to the 2023 population gambling and health study, 78.2 per cent did so in Victorian pubs, clubs and hotels.¹⁸⁰

Figure 4 charts the numbers of EGMs against aggregate expenditure across venues in each electorate (i.e. aggregate player losses), showing a correlation between access to EGMs and losses incurred. Map 1 then gives an indication of EGM prevalence by electorate. This data excludes the casino. In 2022–23 Essendon held the most EGMs (691), but patrons of venues in Mulgrave incurred the biggest losses (\$103,067,945). All electorates had at least one venue operating EGMs, with Morwell holding the most venues (13).

Figure 4: Comparison of the average number of EGMs operating in electorates between 1 July 2023 and 30 June 2024, with the aggregate expenditure (player losses) across all gaming venues within each electorate (excluding the Melbourne Casino)¹⁸¹

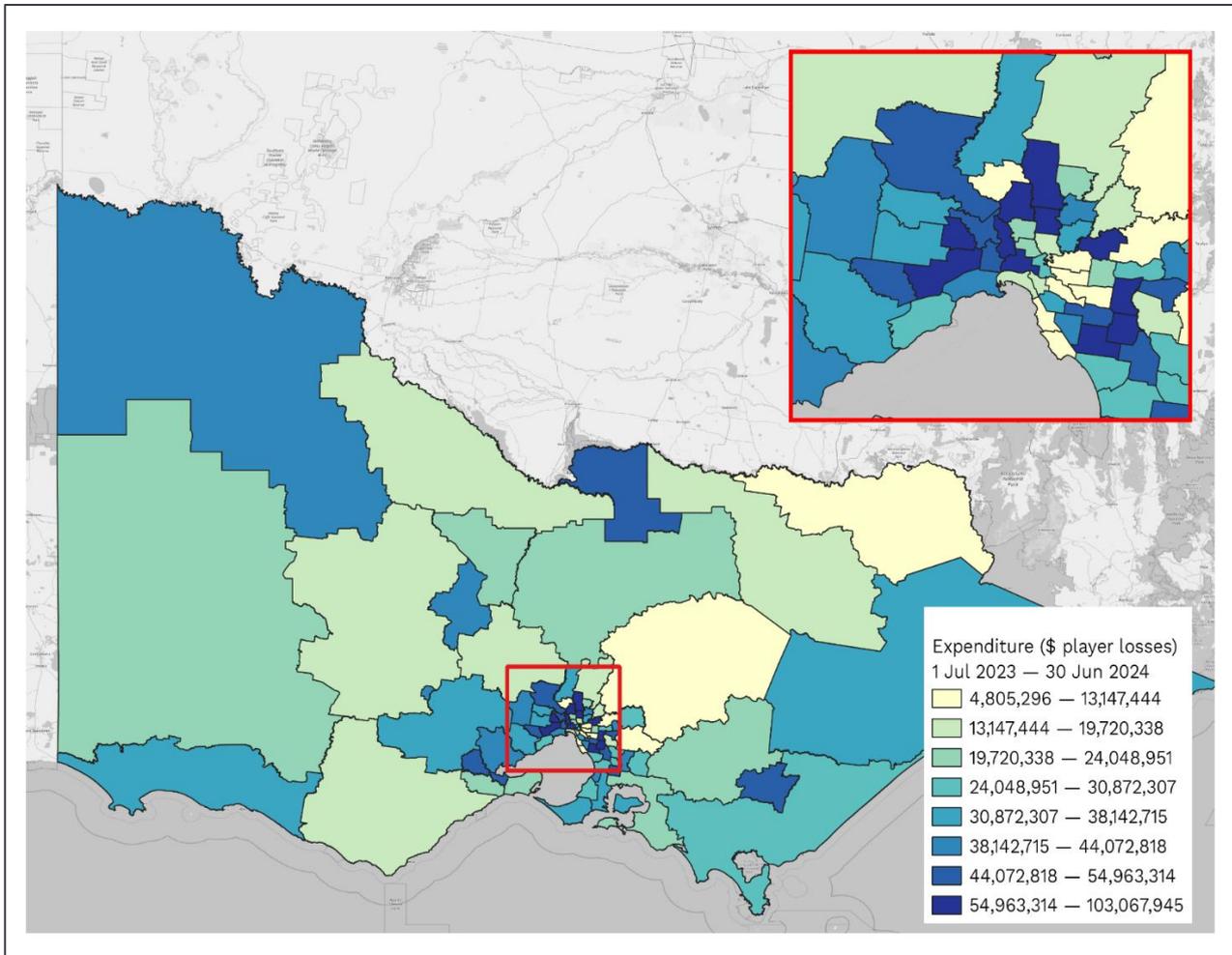
Note: this data is not a reflection of losses by place of residence, because venues are likely to be attended by patrons who live outside a venue’s electorate.

[Click here to access interactive](#)



Map 1: Aggregate expenditure (player losses) across gaming venues within each electorate (excluding the Melbourne Casino), between 1 July 2023 and 30 June 2024

Note: this data is not a reflection of losses by place of residence, because venues are likely to be attended by patrons who live outside a venue’s electorate.



Data source: Victorian Gambling and Casino Control Commission (2024) Electronic gaming machine venue level expenditure, Melbourne, VGCCC. Data visualisation: Parliamentary Library.

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