

6 June 2013



Clubs Australia

Ms Lyn Beverly  
Committee Secretary  
Joint Select Committee on Gambling Reform  
PO Box 1600  
Parliament House  
Canberra ACT 2600

Dear Secretary,

Clubs Australia thanks the committee for providing us with the opportunity to comment on the Interactive Gambling Amendment (Virtual Credits) Bill 2013 ('the Bill').

Licensed clubs have long been leaders in the delivery of responsible gambling services, working alongside regulators to develop sensible and robust harm minimisation standards for the protection of Australian consumers. Clubs Australia recognises that online delivery platforms and new technologies pose pointed challenges for consumers, clubs and policy makers. In particular, it is concerning that popular gambling-style social gaming applications are not subject to the similar safeguards and standards as land-based gambling operations and can be readily accessed by children.

In order to provide guidance to the industry, Clubs Australia has established a Social Gaming Working Group to examine the many issues associated with gambling-style social gaming and establish whether it should be considered a responsible and appropriate option for clubs.

The inaugural meeting of the Working Group was held on 22 May 2013 and at this stage it is yet to form a definitive view on the subject. However, Clubs Australia does not support the blanket prohibition outlined in the current Bill, noting that the Department of Broadband, Communication and Digital Economy's report into the review of the *Interactive Gambling Act 2001* found that prohibiting social gaming was unlikely to be an effective harm minimisation measure.

Clubs Australia remains committed to ensuring that clubs are at the forefront when it comes to responsible service of gambling in Australia.

Yours sincerely,

Anthony Ball  
Executive Director

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