

10 January 2011

Committee Secretary
Joint Select Committee on Gambling Reform
PO Box 6100
Parliament House
CANBERRA ACT 2600



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Dear Secretary,

North Sydney Leagues Club Group consists of 3 premises located in New South Wales, employing approx 192 full-time, part-time and casual employees. Any major reforms which inhibit our current operation will have a considerably adverse impact on our employees as well as of course our ability to contribute to the many projects within the communities of those premises.

As we understand it, the terms of the Inquiry are to focus on the design and implementation of a best practice full pre-commitment scheme consistent with the recommendations and findings of the Productivity Commission. The PC of course noted that a full pre-commitment system is defined as one in which "people must be in the system (ie must have player identification) but voluntarily set limits. If they set limits, they are bound by them."

The PC goes on to say "Full pre-commitment implies a single overarching condition: people should not be able to renege on their pre-committed decisions except on terms that they have already pre-determined. This would include a capacity for self-exclusion."

It is in the contexts of these comments from the PC that we base our understanding and our submission to the Joint Committee.

Whilst in general, we as a responsible provider of gaming services are just as concerned as anyone else in the community or in the Parliament to lessen the impact of gambling on those with a gambling addiction, we cannot be convinced at this stage that mandatory pre-commitment is the answer. We do of course operate a self-exclusion scheme and an associated counselling scheme for any person with a gambling addiction and this has proven to work quite well, a matter well recognised by the Productivity Commission.

In the absence of proven credible trials, the fact is that mandatory pre-commitment is nothing more than a whim. It is, in the absence of credible evidence-based research, nothing more than an exercise in social engineering. Australian citizens deserve better than that.

Having said that, we note that Victoria has embarked on a legislated scheme to introduce a form of pre-commitment and we note too that electronic gaming machines in that State are being adapted for on-screen player information. Crown Casino too has introduced its PlaySafe pre-commitment facility.

It would seem logical then to use the Victorian schemes as pilot studies over say a 2-3 year period to enable full, unbiased and practical analysis of the impact of a full

pre-commitment scheme which might, if proven to be successful, provide the basis for the later introduction of a nationally consistent scheme which could still be ready for introduction by 2016 or 2018 for smaller clubs.

We see many practical difficulties in developing a national scheme, not the least being the need for every individual to have player identification. Implicitly, this would require a club member or a non club member to have a means of identification that can track his/ her player movement from one premises to another. This would be alike to an Australia Card which the people of this country rejected in no uncertain terms on a previous occasion.

There has been media reports too of fingerprinting technology being introduced to provide identification. Fingerprinting is for criminals, not members of community clubs. It is absolutely anathema to our club, its Board of Directors and we believe to the Australian way. It should be rejected strongly by the Joint Committee.

The committee may not be aware that technology which allows a person to pre-commit to a maximum level of spending is already recognised and operating in many NSW Clubs by virtue of the Player Card. This is smart card technology which allows a player to deposit an amount of money on their card and play within that limit. In most cases, the Player Card is merely an adaptation of the player's membership card but with a facility which allows cash to be credited to the card. In other words, it is a binding limit which cannot be exceed by the player.

I draw this to the committee's attention merely to make the point that existing simple smart card technology can be used effectively within a venue without the need for other expensive, unproven technology which might seek to extend usage beyond that venue.

The point is indeed well made by the PC in a related context when it says that "too complex a set of options would be likely to be problematic for consumers". We encourage the Joint Committee to bear that closely in mind in its deliberations.

In conclusion, we make the strong point that whatever scheme is ultimately determined, it must allow participants to voluntarily set limits as proposed by the PC, including the option to not set any limit.

Yours faithfully

Hans Sarlemyn
Group Chief Executive Officer