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Gambling Policy
Department of Treasury and Finance
GPO Box 1045
Adelaide SA 5001

DRAFT AMENDMENTS TO THE GAMING MACHINES ACT 1992

Australian Leisure and Hospitality Group Limited (ALH) is a leading Australian leisure and entertainment business operating over 270 licensed hotels in five mainland jurisdictions. The Group owns and operates thirty two hotels in Adelaide, the majority of which offer gaming entertainment to their patrons.

ALH would like to submit the following comments on draft amendments to the act:

4 Extra Responsibilities for Late Trading Venues and Changes to Closing Hours

4.1 Description

It is proposed to amend the Act so that club and hotel gaming venues that have **not** entered into a responsible gambling agreement with a responsible gambling agency (see section 8 for more detail) must **not** conduct gaming operations:

- before 10am on Monday to Friday; and
- between 2am and 10am on Saturday and Sunday.

It is proposed that club and hotel gaming venues that have entered into a responsible gambling agreement, in a form prescribed by the IGA, with a responsible gambling agency, recognised by the IGA, will be subject to closing requirements currently set in the Act. Further, it is proposed if such a gaming venue operates between 2am and 8am then the gaming venue must ensure:

- that a gaming machine manager or gaming machine employee who has completed advanced problem gambling intervention training is at the venue;
- arrangements are in place under which the gaming machine manager or gaming machine employee may immediately refer a person identified as engaging in problem gambling to a service to address the problem; and
- no machine designed to change notes into coins is operating on the licensed premises between 2am and 8am. **The disabling of all notes to coin dispensers exposes the hotel to increased security risks. It will increase the amount of cash held at the cashier station. Notes that are stored in a change machines are in a secured device akin to a safe.**

2.3 Implementation

Clause 22(3) of the draft Bill removes the fixed price of \$50,000.

The detail of the approved trading system is contained in regulations. New regulations will be required to implement an approved trading system with a variable price.

At this stage, new regulations have not been drafted. If the amendment is passed, it is proposed that the new regulations would let:

- buyers indicate how many entitlements they wish to buy and the maximum price they are willing to pay; and
- sellers indicate how many entitlements they wish to sell and the minimum sale price they are willing to receive.

This would provide buyers and sellers with greater certainty in relation to the approved trading system outcome. If the amendment is passed, the new regulations will be the subject of a six week public consultation.

Clause 22(4) of the draft Bill exempts specific transfers of gaming machine entitlements from stamp duty.

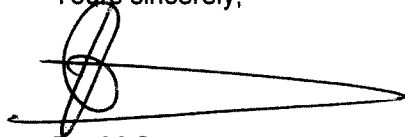
ALH would contend that any approved trading system of gaming machine entitlements includes a requirement if successful bidders are unable to install entitlements within six months of trade that they will go back into the auction pool where sellers receive a sale price less a significant commission.

ALH would also like to be allowed to transfer electronic gaming machines freely between its properties at no penalty, subject to individual hotel machine caps.

ALH welcomes this opportunity to contribute to draft amendments to the Gaming Machines Act 1992

Should you have any queries in relation to the issues raised in this response, please contact me on 03 9829 1000.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'David Curry', written over a horizontal line.

David Curry
General Manager
Operations