Consideration of Proposed Harm Minimisation Measures South Australia 2019

The South Australian Liberal Government has proposed reforms to 'modernise' gambling laws and regulations following the 2016 Administrative Review into Gambling in South Australia and passage of the Budget Measures Bill 2018. The Attorney-General wrote to interested parties to communicate the intent of reforms claiming that the proposed amendments seek to "strike the right balance between supporting a vital part of our economy (i.e. the gambling industry) and maintaining community protections against gambling related harm".

Some 13 key reforms to be considered by Parliament were outlined. Our interest here is in several of the reforms and their potential impact on gambling related harm. They are, the proposal for:

- allowing banknote acceptors to be fitted to gaming machines in clubs and hotels;
- allowing banknote acceptors to be fitted to gaming machines and automated table game equipment in the Casino;
- strictly regulating the … denomination of banknotes and the amount of money able to be inserted into a banknote acceptor;
- allowing clubs with gaming machine licences to amalgamate or transfer gaming machine entitlements between clubs and operate up to 60 machines at a single club venue;
- replacing the current Social Effect Inquiry Process with a new Community Impact and Public Interest test better aligned with liquor licensing requirements;
- allowing vulnerable patrons to be barred for any period (or an indefinite period) from the premises of a single gambling provider or multiple providers;
- expanding the scope of the GRF to include public education, treatment and counselling programs and gambling research; and
- enabling the amount of money a person can obtain on any one card within 24 hours when using EFTPOS facilities in a gaming machine venue to be regulated.

Background

The previous Labor government put forward an amendment to the Gaming Machine Act 1992 to remove the prohibition on access to cash through EFTPOS facilities located **within the gaming area of hotels and clubs**. The South Australian Parliament approved that amendment (Table 1: prior to amendment).

Table 1: Restrictions on ATMs/EFTPOS facilities in the gaming machine areas of clubs and hotels All States and Territories as at Productivity Commission Report 2010

State	ATMs	EFTPOS
New South Wales	Banned from gaming machine area of clubs and hotels.	Banned from gaming machine area of clubs and hotels
Victoria	Banned from gaming venues (exemptions available for small towns in regional Victoria where access to cash is limited)	Banned from gaming machine area of a gaming venue
Queensland	Banned from being in or close to gaming areas of venues.	Banned from (or within close proximity to) gaming machine area of a gaming venue
South Australia	Banned from gaming machine area of gaming venues and gaming floor of Adelaide Casino	Banned from gaming machine area of clubs and hotels and gaming floor of Adelaide Casino
Tasmania	Banned from hotels and clubs	Access available in hotels, clubs and casinos with the restriction of one cash withdrawal for gaming per day
Australian Capital Territory	Banned from gaming areas of hotels and clubs	Banned from gaming areas of hotels and clubs
Northern Territory	Banned from gaming areas of hotels, clubs and the casino	Banned from gaming areas of hotels, clubs and the casino

Source: Productivity Commission Inquiry Report, Volume 1, No. 50, 26th February 2010. Western Australia is excluded from the Table as it does not have gaming machines in hotels or clubs.

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This means that South Australia is currently *the only* jurisdiction to permit, via EFTPOS facilities, access to cash in the actual gaming area of a hotel or club. The situation prior to this amendment is at Table 1 which is a clear summary of the intent of public policy to minimise harm and protect consumers. The decision to enable gamblers to access cash in the actual gaming area runs counter to the efforts of all jurisdictions and regulators (including evidence and policy advice of the Productivity Commission and researchers) to restrict access to cash whether that involves ATMs, the cashing of cheques and restrictions on credit facilities. The South Australian Centre for Economic Studies based on a research of articles in gambling journals, gambling websites and websites of regulators cannot find one jurisdiction that permits access to cash or credit facilities located directly in a gaming area.

It is interesting to now reflect on that amendment with the current court case against the Matthews Hotel Group for allegedly breaching laws limiting cash withdrawals in hotels and clubs. Recall that gambling staff, managers and licensees are expected to monitor EFTPOS withdrawals (in ways unspecified) yet it was staff and a hotel manager in one of at least 40 transactions that did the alleged offending. Some eight charges of breaching the EFTPOS laws have been laid.

Note further that the alleged offending was not detected by the Office of the Liquor and Gaming but rather the alleged offending came to the "attention of Consumer and Business Services when a husband concerned about his wife's withdrawals reported the transactions."

The simple fact is that the frequency of transactions are not monitored, that the regulator is not in a position to monitor or prevent offending.

The situation in South Australian hotels and clubs is that an individual has:

- access to cash using EFTPOS inside the gaming area;
- access to EFTPOS in other facilities in the venue;
- access to an ATM if located in the venue; and
- access to an ATM proximate but located outside a venue. Individuals in this environment do not even have to have multiple credit or debit cards as access to funds is extremely liberal.

Contrast this with the situation in Victoria where ATMs are not permitted in a venue that offers gaming, and VCGLR rules that provide that an EFTPOS device or ATM must not be accessible by any person (staff or gambler) within the gaming machine area of an approved gaming venue for the purposes of withdrawing cash.

Other states have banned ATMs and EFTPOS in gaming venues outright. It is undesirable that South Australia stands alone as the worst jurisdiction in the ability to access cash in a gaming venue with which to gamble.

It now proposes to compound that status of South Australia being a pariah by allowing gaming machines to be fitted with note acceptors in hotels, clubs and the casino.

To argue that the current and proposed amendments are concerned with harm minimisation is Orwellian doublespeak to say the least. That it contradicts all serious gambling research is simply a statement of fact.

The Need for Evidenced Based Policy

There are a number of reputable studies that evidence the availability of easy access to cash and that the availability of note acceptors increases the potential for gambling harm.

One Australian study conducted in the Northern Territory following the introduction of note acceptors, "Evaluating changes in electronic gambling machine policy on user losses in an Australian jurisdiction" concluded that

> *"The analysis demonstrates that reductions in how much money gamblers can insert into an EGM (load-up limit), and/or the abolition of note acceptors … is likely to reduce harm from EGM use".*[1]

The availability of note acceptors and load-up limits were reported to contribute to a 47 per cent increase in user losses in the four years following their introduction compared to a decrease in losses in the four years beforehand. The Australian Productivity Commission has previously recommended restricting load-up on EGMs to $20 only because of the likely impact on gambler losses. The Northern Territory changes allowed for a maximum load-up limit of $1,000.

[1] Stevens M and C Livingstone (2019), "Evaluating changes in electronic gambling machine policy on user losses in an Australian jurisdiction", BMC Public Health, p 1.

A ban on note acceptors in Norway (commencing on 1 July 2006) resulted in a 17 per cent reduction in gross turnover in the first six months and most importantly this was associated with a 62 per cent decrease in the number of gamblers and relatives making calls to the national helpline.[2]

The association of a decline in gross turnover and fewer helpline callers suggests the ban on note acceptors is a positive harm minimisation measure and hence should be sustained in South Australia.

Victorian hotels and clubs permit note acceptors but at the same time they have serious policy initiatives relating to the location of ATMs, the location of EFTPOS in venues and limits on transaction and daily withdrawals from EFTPOS that effectively inhibit or slowdown access to money note denominations to be fed into note acceptors. South Australia has none of this.

Other states have attempts (via regulators) at harm minimisation that South Australia does not have (Appendix A).

Queensland stipulates that ATMs and EFTPOS machines are not located in (or close proximity to) an area of the licensed premises used for gaming. The ATMs accept debit cards only.

Tasmania does not permit note acceptors for EGMs in hotels and clubs. All jurisdictions do not permit 24 hour gambling in hotels and clubs.

Western Australia, without EGMs in hotels and clubs, has the lowest rate of reported problem gambling and the lowest rate of per capita losses; New South Wales that permits load-up limits of up to $7,500 which is soon to be reduced to $5,000 has the highest rate of problem gambling and the highest losses per capita.

Access to Statistical Data

Gambling policy and impacts of changes to gambling legislation cannot be evaluated or assessed as a contribution to evidence-informed policy or provided to the benefit of informing legislators. The principal reasons are twofold:

(a) the reluctance of administrators/regulators to commission and appropriately support research inquiry that is substantive including that it is industry and state specific where required; and

(b) that statistical data which is of public interest and the availability of which should be a condition of a gambling licence is not made available.

The release of revenue data from EGM gambling is in the public interest. *The Victorian Gambling Regulation Act 2003* provides for aggregated and disaggregated data where publication is in the public interest and is not unreasonable.

Specifically Section 10.1.33 on Aggregation of statistical information states:

10.1.33 Aggregation of statistical information

(1) Any statistical information published about gambling expenditure in relation to gaming venues (whether pursuant to an authorisation under section 10.1.32(3) or otherwise) must be aggregated—

(a) to give the total gambling expenditure for all approved venues in a municipal district; and

(b) if a municipal district has less than 3 approved venues, to give the total gambling expenditure for all approved venues in the municipal district together with an adjoining municipal district or districts so that the statistical information indicates gambling expenditure for at least 3 approved venues—

except as authorised by or under subsection (2).

(2) The Minister or the Commission may publish, or authorise the publication of, disaggregated statistical information if the Minister or the Commission (as the case requires) considers that—

(a) publication is in the public interest; or

(b) in the circumstances, publication is not unreasonable.

The provisions of the *Act* provide for venue level data which is available on a monthly basis.

[2] Rossow I and M Hansen (2019), "Gambling and gambling policy in Norway – an exceptional case", *Addiction*, Volume III, Issue 4.

The Victorian Commission for Liquor and Gambling Regulation (VCLGR) provides the following data:

1) Gaming data: related content

Released bi-annually, this data set provides information relating to the total expenditure at each gaming venue. It includes venue classification and the allocation of electronic gaming machines (EGMs) throughout Victoria.

Current gaming expenditure by venue (XLS, 493.5 KB)

Historical gaming expenditure by venue (XLS, 675 KB)

The Expenditure by Venue is a dynamic content page profiling the same data as represented in the files above with each listing providing details of that gaming venue, including current year expenditure, venue location and classifications, licence and nominee details.

2) Gaming Venue Operator: Electronic Gaming Machines

Released monthly this data set provides gaming expenditure by local government area.

Released monthly on the fourth Friday of each month, this data set provides information relating to the various local government areas (LGAs) throughout Victoria, primarily the region classification, total gaming expenditure and the number of electronic gaming machines (EGMs) and gaming venues per LGA.

Current gaming expenditure by LGA - monthly (XLS, 287 KB)

Historical yearly expenditure 2002-2019 (XLS, 283.5 KB)

Historical yearly expenditure 2000-2003 (XLS, 185 KB)

Historical yearly expenditure 1992-2000 (XLS, 203 KB)

The Monthly LGA EGM Statistics is a dynamic content page profiling the same data as represented in the files above with each LGA listing providing details including identification of gaming venues within the LGA, mapping of geographical location of all venues, current year expenditure, venue location and classifications and licence and nominee details.

3) Population Density and Gaming Expenditure

Released annually, this data set displays gaming expenditure compared to population density.

This data set includes population and expenditure breakdowns by local government area (LGA) and gaming venue, demographic statistics, labour statistics and Socio-Economic Indexes for Areas (SEIFA) LGA score and ranking per LGA.

Current LGA population density and gaming expenditure statistics (XLS, 314.5 KB)

Historical LGA population density and gaming expenditure statistics (XLS, 432.5 KB)

So for Victoria, in summary historical gaming data by venue is provided each month, aggregated and disaggregated data is available on a current and historical basis by venue and by LGA and expenditure statistics are calculated and provided on a population basis.

The relevant XLS files provide data by the name of the venue, the region (metropolitan/country), by LGA name, venue type [hotel/club], by month and by six month intervals and the number of EGMs per venue.

South Australia needs to adopt the Victorian regime and make aggregated and disaggregated data available. The data relates to gambling only, it is not commercial-in-confidence and it does not include all revenue generated by a club or hotel that may provide accommodation, meeting facilities, food service and bottle service.

The lack of transparency and the poor record of serious research commissioned in South Australia provides a veil of secrecy that is certainly not in the public interest. It reflects a lack of maturity in policy debates, leaving policy makers to fall back on conjecture, assumptions or the powerful influence of lobbyists and industry.

A number of the proposed changes as signalled by the Attorney-General appear to emanate from considerations in the Anderson (2016) report titled "Administrative Review of Gambling Regulation in South Australia". That report **DID NOT** address the complex question and regulating safeguards for harm minimisation in its review of commercial gambling, noting

> *"1.1.15. The Government has indicated that responsible gambling policies, harm minimisation and problem gambling measures are not to be considered as part of this review, but rather I should concentrate on the regulatory arrangements.*
>
> *1.1.16. However, it is not possible to exclude problem gambling and harm minimisation objects from the overall regulatory framework for commercial gambling. To that extent, I will deal with the management and control of these issues."*

Notwithstanding, Anderson (2016) in arguing for a "contemporary gambling regulatory framework", considers

> *"1.1.3. … At the same time, we must consider the significant social issues associated with problem gambling and establish appropriate monitoring, control and remedial mechanisms.*
>
> *1.1.4. At present there is no evidence in any of the State's commercial gambling legislation for the inclusion of the objects of the legislation. These objects should in my opinion include harm minimisation and a means of controlling problem gambling, particularly within disadvantaged communities."*

Community Impact and Social Impact

The Anderson Inquiry (2016) is critical of the time taken and the extended argument around the proposed SAJC gaming proposal at Cheltenham which was ultimately rejected. Anderson (2016) proposes replacing the current Social Effect Inquiry Process "with a new Community Impact and Public Interest Test better aligned with liquor licensing requirements" (6.3.12).

It might be said that the industry, local councils, the community sector and individuals are severely restricted in presentation of their case to any inquiry precisely because the lack of access to venue, SLA and LGA gaming data. Without access to the most important source of data related to gaming it is simply not possible to present an objective and verifiable argument.

Would a proposed retail outlet consider setting up a shop without analysis of existing competitors, their floor space, parking, population density, per capita consumption trends, hours of opening and estimate of current turnover?

SACES has assisted the VCGLR revise the data requirements to assist them in decisions regarding new venues and the movement of machines under what is called the "no-net detriment test" which is heard by the Victorian Civil and Administrative Tribunal (VCAT).

It is argued that the "Cheltenham case/decision" took so long precisely because the necessary data was not available, assumptions were entirely subjective and each was challenged and the final decision was, with great difficulty, almost totally reliant on the credibility of witnesses and the belief that they would or could implement regulatory conditions that might be imposed on them.

Indeed if I was an existing venue operator I might wish to oppose an application on the basis the area is already well served for liquor and gaming and that the proposed new venue will cannibalise my revenue. A local council might wish to use the same argument.

The proposed Community Impact and Social Impact test will fail for the same reason – objective analysis is not possible without access to the most important source of data. Existing venue level data is necessarily required and there is no reason why Parliament should not legislate accordingly.

Conclusion

It is my view that a 'contemporary gambling regulatory framework' is associated with and characterised by an open, transparent, mature and informative supply of data, research and sensible debate regarding the policy framework.

That venue level gambling data is made available is the first test of a contemporary gambling regulatory framework. The availability of data equivalent to that provided by the VCGLR is also essential in the process of any social inquiry and community impact test.

Recommendations

It is recommended that:

- Parliament reject the proposal to allow note acceptors;
- if Parliament accepts the proposal to allow note acceptors that it bring forward a requirement to remove ATMs from gaming venues;
- if Parliament accepts the proposal to allow note acceptors that it removes from all venues the ability to access cash via EFTPOS inside a gaming area; and
- the Parliament require that aggregated and disaggregated venue level data be made publicly available by the relevant Minister and authority consistent with the situation in Victoria.

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Executive Director

31 October, 2019

Appendix A

Summary of Gambling Environment and Conditions

South Australia	
Total Machines:	Entitlements*: Hotels and Clubs 12,687 Casino: 1,080 current – can hold a maximum of 1,500
Machine Locations:	Hotels and Clubs/Casino
24 Hour Gambling	No (Clubs & Hotels), Yes (casino)
Cheque Payouts:	$1,000+ if requested by patron. To be paid as soon as practicable, in any case within 30 minutes
Note Acceptors:	Not permitted
Game Frequency:	Not prescribed
Maximum Bet:	Hotels and Clubs $5 Casino (main floor) $5; (premium area) no limit
Win Limits:	Hotels and Clubs $10,000 Casino (main floor) $10,000; (premium area) no limit
Limits on Lines / Ways:	Not prescribed
Minimum RTP:	87.5%
Are ATMs permitted in hotels/clubs with EGMs?	Yes
Is there a daily withdrawal limit per card?	$250 per 24 hour period.
Are EFTPOS withdrawal limits imposed in hotels/clubs with EGMs?	Yes
Is there a daily withdrawal limit per card?	No, but $200 per transaction limit for Hotels and Clubs
What is the limit per day?	N/A
Regulator:	Liquor and Gambling Commissioner through Consumer and Business Services
Load up Limit on Note Acceptors:	

Note: * Maximum number of entitlements which can currently be held. Actual number of machines currently in operation is less than these numbers.

Australian Capital Territory	
Total Machines:	3,873
Machine Locations:	Clubs (3,823) and Hotels (50)
24 Hour Gambling	No (5 hour break)
Cheque Payouts:	Winnings over $1,200 are paid by cheque
Note Acceptors:	Accept $5, $10 and $20 notes
Game Frequency:	No restrictions
Maximum Bet:	$10 per spin
Win Limits:	None
Limits on Lines / Ways:	None
Minimum RTP:	87 per cent
Are ATMs permitted in hotels/clubs with EGMs?	
Is there a daily withdrawal limit per card?	
Are EFTPOS withdrawal limits imposed in hotels/clubs with EGMs?	
Is there a daily withdrawal limit per card?	
What is the limit per day?	
Regulator:	ACT Gambling and Racing Commission
Load up Limit on Note Acceptors:	No

New South Wales	
Total Machines:	94,000
Machine Locations:	Clubs & Hotels (92,500), Casino (1,500)
24 Hour Gambling	No (Clubs & Hotels), Yes (Casino)
Cheque Payouts:	Winnings over $5,000 at clubs and hotels and winnings over $2,000 in a casino, paid by cheque
Note Acceptors:	Accept $5, $10, $20, $50 and $100 notes
Game Frequency:	No restrictions (National Standards)
Maximum Bet:	$10 per spin (Clubs & Hotels), Casino has a $10 max bet limit on the main gambling floor. 1,000 EGMs no limit, 500 EGMs with same limit as clubs and hotels
Win Limits (Clubs/Hotels):	$10,000, $500,000 (MTGMs)
Win Limits (Casino):	None
Limits on Lines / Ways:	None
Minimum RTP:	85%
Are ATMs permitted in hotels/clubs with EGMs?	Yes permitted in hotels/clubs, but not if they can allow withdrawals from credit accounts (s.47c of the GM Act), and they have to be located away from the gaming area (c.287 of the GM Regulation)
Is there a daily withdrawal limit per card?	There are no withdrawal limits imposed (however there is a requirement that problem gaming notices are displayed – c.24 of the Regulation)
Are EFTPOS withdrawal limits imposed in hotels/clubs with EGMs?	There are no EFTPOS withdrawal limits imposed in hotels/clubs with EGMs.
Is there a daily withdrawal limit per card?	N/A
What is the limit per day?	N/A
Regulator:	Liquor and Gaming NSW
Load up Limit on Note Acceptors:	$7,500 in Clubs, Hotels and Casino – Authority approved reduction to $5,000 to come into effect in six months time.

Queensland	
Total Machines:	45,474
Machine Locations:	Clubs & Hotels (41,641), Casino (3,833)
24 Hour Gambling	No (Clubs & Hotels), Yes (casino)
Cheque Payouts:	Winnings over $5,000 are paid by cheque
Note Acceptors:	Accept $5, $10, $20, $50, $100 notes. Casinos unrestricted (NB: Club and hotel EGMs will only accept notes if current EGM credit is less than $100)
Game Frequency:	3 seconds between game start and finish
Maximum Bet:	$5 per spin (Clubs & Hotels), No limit (Casino)
Win Limits (Clubs/Hotels):	$25,000 (Stand Alone Progressive Jackpot), $60,000 (linked Progressive Jackpot)
Win Limits (Casino):	None
Limits on Lines / Ways:	No official limits, but all designs are reviewed on case per case basis
Minimum RTP:	85% - 92% (Clubs & Hotels), 85% (minimum)(Casinos)
Are ATMs permitted in hotels/clubs with EGMs?	ATMs (used for dispensing of cash) are not located (or in close proximity to) an area of the licensed premises used for gaming. All ATMs installed at the licensed premises accept debit cards only.(1)
Is there a daily withdrawal limit per card?	N/A
Are EFTPOS withdrawal limits imposed in hotels/clubs with EGMs?	EFTPOS machines (used for the dispensing of cash), are not located in (or in close proximity to) an area of the licensed premises used for gaming.
Is there a daily withdrawal limit per card?	N/A
What is the limit per day?	N/A
Regulator:	QLD Office of Liquor and Gaming Regulation
Load up Limit on Note Acceptors:	

Queensland Office of Liquor and Gaming Regulation

(1) **Installing ATMs**

We strongly recommend that ATMs are installed as far away from the gaming area as possible. In addition to the requirements of Schedule 2, the Responsible Gambling Code of Practice recommends that ATMs are not to be located in close proximity to any designated gambling area (e.g. where gaming machines, TAB or Keno facilities may be offered). In line with responsible gambling practices, ATMs should be screened from the gaming room and visible signage limited.

OLGR acknowledges that licensees must meet other requirements, such as health and safety laws. However, the licensee must meet the conditions of their gaming licence while also adhering to any other regulatory requirements. We recommend that the ATM is removed if other regulatory requirements result in the ATM being located in close proximity to the gaming area.

EFTPOS terminals

EFTPOS terminals are viewed in much the same way as ATMs, and the above advice should be taken into account when placing EFTPOS terminals.

OLGR has no issue with the location of EFTPOS terminals that are not used for the dispensing of cash, provided these are signed accordingly at the site and marked as such on the plan

Tasmania	
Total Machines:	3,536
Machine Locations:	2,315 (Clubs & Hotels), 1,185 (Casinos), 36 (Spirit of Tasmania vessels)
24 Hour Gambling	No – maximum of 20 hours of EGM operation is permitted within the Casinos, Clubs and Hotels. There must be at least 4 continuous hours each day when EGMs are not operating.
Cheque Payouts:	Winnings over $1,000 paid by cheque or direct bank transfer. Patrons have the opportunity for any winnings in excess of $300 to be paid by cheque or direct bank transfer.
Note Acceptors:	Banned in Clubs or Hotels
Game Frequency:	Minimum spin rate of 3 seconds
Maximum Bet:	$5 per spin
Win Limits:	$25,000 (Stand Alone Progressive Jackpot), $60,000 (linked Progressive Jackpot). Clubs & Hotels only.
Limits on Lines / Ways:	Maximum of 30 lines is permitted
Minimum RTP:	85%. No maximum is decreed
Are ATMs permitted in hotels/clubs with EGMs?	ATMs are not permitted to be located on any premises that operates gaming machines, keno or totalisator wagering. This does not apply to the two Casinos (Wrest Point Hotel Casino and Country Club Casino), where operators must ensure that customers are not able to withdraw more than $400 per day from any debit or credit card at an ATM located at a Casino. The ban on the installation of ATMs within Hotels and Clubs has been in place in Tasmania since 1997.
Is there a daily withdrawal limit per card?	N/A for hotels/clubs
Are EFTPOS withdrawal limits imposed in hotels/clubs with EGMs?	EFTPOS cash withdrawal transactions processed by: - Casinos are limited to a maximum amount of $200 for gambling purposes and no more than one EFTPOS transaction is permissible, per day, per customer. - all venues (excluding Casinos) are limited to a maximum amount of $200 for <u>any</u> purpose and no more than one EFTPOS transaction is permissible, per day, per customer.
Is there a daily withdrawal limit per card?	Yes
What is the limit per day?	$200
Regulator:	Tasmanian Liquor and Gaming Commission
Load up Limit on Note Acceptors:	$500 (Casino only)

Victoria	
Total Machines:	30,000
Machine Locations:	Clubs & Hotels (27,372), Casino (2,628)
24 Hour Gambling	No (Clubs & Hotels), Yes (Casino)
Cheque Payouts:	Winnings of $2,000 or more paid by cheque or EFT (EFT transfer must ensure that funds are not available for 24 hours0
Note Acceptors:	Accept $5, $10, $20 and $50 notes
Game Frequency:	Minimum spin rate 2.14 seconds
Maximum Bet:	$5 (Clubs & Hotels), $10 (Casino), unless the game is operating in unrestricted mode in a specified area at the Casino.
Win Limits:	None
Limits on Lines / Ways:	None
Minimum RTP:	85% Clubs & Hotels, 87% Casino
Are ATMs permitted in hotels/clubs with EGMs?	No. ATMs are not permitted within premises within which there is a gaming machine area with EGMs. Hence, there can't be ATMs anywhere on the premises, or in the carpark. Potential exemption for premises outside metropolitan area with no banks or no other ATMs, but to date no exemptions have been granted.
Is there a daily withdrawal limit per card?	N/A
Are EFTPOS withdrawal limits imposed in hotels/clubs with EGMs?	Yes. EFTPOS is not allowed within the gaming machine area itself, and the transaction must involve a staff member.
Is there a daily withdrawal limit per card?	$200
What is the limit per day?	Limit per 24 hours: $500
Regulator:	Victorian Commission for Gambling and Liquor Regulation
Load up Limit on Note Acceptors:	

Western Australia	
Total Machines:	Limit of 2,500
Machine Locations:	Crown Perth Casino only (Limited of 2,500)
24 Hour Gambling	Yes
Cheque Payouts:	No regulations
Note Acceptors:	Unlimited
Game Frequency:	National Standards
Maximum Bet:	$225
Win Limits:	None
Limits on Lines / Ways:	None
Minimum RTP:	90%
Are ATMs permitted in hotels/clubs with EGMs?	N/A – no EGMs permitted in hotels/clubs Casino – see note below
Is there a daily withdrawal limit per card?	N/A – no EGMs permitted in hotels/clubs
Are EFTPOS withdrawal limits imposed in hotels/clubs with EGMs?	N/A – no EGMs permitted in hotels/clubs
Is there a daily withdrawal limit per card?	N/A – no EGMs permitted in hotels/clubs Casino: $400 daily limit if located within 40 metres of any entrance to gaming floor
What is the limit per day?	N/A – no EGMs permitted in hotels/clubs
Regulator:	Department of Local Government , Sport and Cultural Industries
Load up Limit on Note Acceptors:	Unlimited

Note:

Policy with respect to casino: ATMs to be located on the same level as the casino main entry, close to the location of the security officers and under existing CCTV coverage but limits access to encourage patrons to have breaks in play as part of harm minimisation requirements.

In respect of Crown Perth, the following provisions apply:

- ATMs are prohibited from being located in the area covered by the casino gaming licence; and
- ATMs are prohibited from being located within 40 metres (walking distance) of any entrance to the gaming floor, unless the ATM has a withdrawal limit of $400 per customer, per day (24 hours).

Northern Territory	
Total Machines:	
Machine Locations:	
24 Hour Gambling	
Cheque Payouts:	
Note Acceptors:	
Game Frequency:	
Maximum Bet:	
Win Limits:	
Limits on Lines / Ways:	
Minimum RTP:	
Are ATMs permitted in hotels/clubs with EGMs?	
Is there a daily withdrawal limit per card?	
Are EFTPOS withdrawal limits imposed in hotels/clubs with EGMs?	
Is there a daily withdrawal limit per card?	
What is the limit per day?	
Regulator:	
Load up Limit on Note Acceptors:	