



Gambling reform in the ACT, 2016– 2024: What impact on gaming machine expenditure?

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Abstract

This paper outlines the reforms to electronic gaming machine (EGM) operations in the ACT between 2016 and 2024. It begins by detailing the two parliamentary agreements from 2016 and 2020, along with the reform agendas they introduced. The paper then traces the implementation timeline of these reforms and others. The most significant reform during this period was a reduction in the number of EGMs.

The paper then analyses the impact of reducing EGM numbers on problem gambling prevalence, and on EGM expenditure. Problem gambling levels did not decrease between 2014 and 2019, the period for which we have data. Additionally, there is no evidence that the surrender of EGM authorisations reduced EGM expenditure. Comparing venues that surrendered EGM authorisations with those that did not, no relationship was found between the surrender and changes in total EGM expenditure. This suggests that the reduction in EGM licenses led to increased utilisation of remaining EGMs, rather than a reduction in gambling losses overall.

Declaration of interests

FM and AS have no conflicting interests to declare in relation to this work. AS has received relevant funding from multiple sources, including Australian Federal and State/Territory government departments including the Victorian Responsible Gambling Foundation, NSW Office of Responsible Gambling, and the Australian Capital Territory Gambling and Racing Commission (through hypothecated taxes from gambling revenue). In addition, AS regularly provides independent advice to the ACT, NSW and Victorian governments as well as gambling-harm community organisations, advocacy groups and peak bodies on evidence-based gambling harm reduction measures. FM has previously provided advice regarding the evidence base for gambling reform to members of multiple political parties in jurisdictions including the ACT, and to gambling reform advocacy groups. FM and AS are not a members of any political party.

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Acronyms

ACT	Australian Capital Territory
ANU	Australian National University
ATM	Automatic Teller Machine
CGRA	Canberra Gambling Reform Alliance
CMS	Centralised Monitoring System
EFTPOS	Electronic Funds Transfer at Point of Sale
EGM	Electronic Gaming Machine
GGMR	Gross gaming machine revenue
MLA	Member of the Legislative Assembly
PGSI	Problem Gambling Severity Index
SCJCS	Standing Committee on Justice and Community Safety

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Introduction

Since 2016, successive governments in the Australian Capital Territory (ACT) have pledged to reform electronic gaming machine (EGM) regulation in the Territory. In 2016, and again in 2020, ACT Labor and the ACT Greens negotiated over reforms to EGMs as part of their parliamentary agreements. Accordingly, the ACT Government introduced several legislative and regulatory reforms. One of the key commitments of the 9th parliamentary agreement was to reduce the number of EGM authorisations in the ACT from around 5,000 to 4,000 by 2020. This target was reached on time, and extended in the 10th parliamentary agreement which included a commitment to reduce EGM numbers further to 3,500 by 1 July 2025. Efforts to reach this target appear to be on track. The reduction in EGM numbers remains the most significant reform introduced over the last eight years in the ACT. Few other measures have not been implemented between 2016 and 2024.

Despite the reduction in EGM numbers in the territory, there is no evidence suggesting that there has been a reduction in gambling harm over this time period 2014 – 2019. Although EGM participation declined significantly between 2009 and 2019, from 30.2% to 19%, most of this reduction happened prior to 2014. The prevalence of gambling-related harm has not followed a similar downward trajectory. Problem gambling prevalence, as measured by the Problem Gambling Severity Index (PGSI), showed no substantial reduction and even increased by 2019.

Another proxy measure of gambling-related harm from EGMs is EGM expenditure, money lost by gamblers on EGMs. If EGM reform measures are effective, they will drive down the amount of money lost on EGMs. This paper further explores the impact of the ACT's EGM reforms between 2016 and 2024 on reducing EGM expenditure. It finds no evidence that the reduction in EGM numbers has reduced EGM expenditure. Rather, the reduction in gaming machine numbers has led to the remaining machines being more heavily utilised.

EGM gambling reforms in the ACT, 2016–2024

Parliamentary Agreement for the 9th Legislative Assembly

After the 2016 election for the ACT Legislative Assembly, the Labor Party, headed by Andrew Barr, formed government in coalition with the ACT Greens. Gambling reform had been a major issue during the 2016 campaign for the first time since the establishment of Canberra Casino in 1989 (Bennett, 1989). Public debate in 2016 mostly focused on the Labor government's decision to allow the Canberra Casino to purchase 200 EGM licenses from ACT clubs, allowing gaming machines into the casino for the first time (Lawson & McIlroy, 2016).

The industry lobby group ClubsACT fought the casino decision which it felt threatened the club sector's viability in Canberra (Lawson, 2016). Some clubs bankrolled the creation of a new political party, while others sent election day text messages to club members imploring them to vote Liberal (Markham & Young, 2016b). The Labor party responded with a promise of tax rebates for smaller clubs (ABC News, 2016). In contrast, the ACT Greens sought the introduction of more thorough-going evidence-informed harm minimisation measures as part of their election platform, including the introduction of \$1 maximum bets, mandatory pre-commitment, a reduction in the number of EGMs in the territory, a ban on political donations from gambling operators, and a transition package for the clubs sector (ACT Greens, 2016a, 2016b).

When the time came for the coalition partners to negotiate a parliamentary agreement, a compromise was reached (Table 1). Specifically, a commitment was made to '[r]educe the number of electronic gaming machine licenses in the ACT to 4000 by July 2020' (Barr et al., 2016, p. 7). However, the Greens agenda for stronger reforms such as 'further harm reduction measures, including mandatory pre-commitment systems and bet limits for electronic gaming machines' were only to be 'explored' (Barr et al., 2016, p. 7). Minor adjustments to the Problem Gambling Assistance Fund and a review of the Community Contributions scheme were also agreed to.¹

Table 1: Selected gambling reforms in the 9th Parliamentary Agreement

<ol style="list-style-type: none">1. Reduce the number of EGM licences in the ACT to 4000 by 1 July 20202. Explore further harm reduction measures, including mandatory pre-commitment systems and bet limits for EGMs3. Increase the Problem Gambling Assistance Fund levy from 0.6% of gross gaming machine revenue to 0.75% and direct additional funds addressing problem gambling; and4. Review the current community contribution scheme, with a view to maximising the direct benefit to the community.

Source: Barr et al. (2016, p. 7).

Reducing EGM numbers, 2016–2020

The process of reducing the number of EGMs had commenced one year earlier. In the ACT, the possession or use of gaming machines has been regulated for the last 50 years, since 1975.

¹ Changes to public finance or to the issue of diversifying the revenue sources of clubs are not discussed in this paper. The percentage of gross gaming machine revenue (GGMR) that is payable by EGM operators to the Problem Gambling Assistance Fund was increased from 0.6% to 0.75% by the *Justice and Community Safety Legislation Amendment Bill 2017*, commencing on 1 July 2017. From 2017-18, small and medium clubs/club groups (defined as gaming machine licensee/s with an aggregate gross gaming machine revenue (GGMR) of less than \$4 million per annum) became eligible for a 50% rebate on their gaming machine taxes, through the *Gaming Machine Amendment Bill 2017*.

Originally, number of gaming machines was specified for each venue, but in 1998 the *Gaming Machine Act 1987* was amended to set a ‘cap’ for the maximum number of gaming machines in the Territory at 5,200, a number that was reached in December 2006. With the passage of the *Gaming Machine (Reform) Amendment Act 2015*, a new mechanism to reduce EGM numbers was introduced. This legislation introduced EGM authorisation trading to the ACT for the first time, and did so while simultaneously introducing measures to reduce the overall number of EGMs in the jurisdiction.² The scheme was to operate in two phases. In the first, which was to last for three years, one out of every four EGM authorisations sold under the new trading scheme was to be forfeited. Phase 1 commenced on 31 August 2015. Phase 2 would have replaced forfeiture through trading with compulsory surrender measures applied to EGM licenses at larger venues to achieve a ratio of 15 EGMs authorisations per 1,000 adults. By mid-2018, this would have meant reaching a nadir of 4,977 EGMs. After this time, the number of EGM authorisations would have been set to increase in direct proportion with the growth of the adult population.

Phase 2, however, never commenced. The commitments made in the 2016 Parliamentary Agreement tightened the planned regime of EGM removals. Rather than EGM numbers climbing again from just under 5000 in 2018 as per the planned Phase 2, a commitment was made to reduce machine numbers to 4000 by 2020. Following a review (Stevens, 2018), a new scheme to reduce EGM numbers was devised. To reach the target of 4000 EGMs, the *Gaming Legislation Amendment Act 2018* created financial incentives for clubs to voluntarily surrender EGM authorisations, beginning from December 2018. If the voluntary license surrenders were insufficient to put the territory on track for reaching the target of 4000 EGMs by 2020, the Minister was empowered to force clubs to surrender EGM authorisations. The one-in-four trading forfeiture scheme from Phase 1 was also retained.

The measures to force the compulsory surrender of machines were not activated, with voluntary surrenders proving to be sufficient. As a result of this scheme, the number of EGM authorisations fell from 4,942 to 4,001 between 30 November 2018 and 31 July 2019 (Gambling and Racing Commission, 2018, 2019b). Almost all of this reduction (920 EGM authorisations) resulted from voluntary surrenders rather than trading forfeiture.

Other measures, 2016–2020

Several other reforms were implemented during the term of the 9th Legislative Assembly, but they were relatively insignificant in terms of their potential to reduce gambling harm. One notable initiative aimed to close a loophole regarding cash withdrawals in EGM venues. Cash withdrawals from automatic teller machines (ATMs) in clubs with EGMs were already limited to \$250 per card per gaming day. Some clubs had side-stepped this restriction on cash withdrawals by assisting gamblers to withdraw cash via an Electronic Funds Transfer at Point of Sale (EFTPOS) transaction. The *Gaming Machine (Cash Facilities) Amendment Act 2017* responded to this by limiting EFTPOS cash withdrawals in clubs to a maximum of \$200 per transaction and specified that such withdrawals could only be made at a single designated location outside the gaming area. Because the EFTPOS limit was per transaction rather than per day (as with the ATM limit), there was little to prevent gamblers from making multiple EFTPOS transactions over the course of a single gambling session.

Gambling harm advocacy groups during this time sought to raise attention to the lack of reforms to key EGM ‘parameter settings’ — the parameters which determine some of the structural characters of EGMs and accordingly their harmfulness. Accordingly, a report commissioned by pressure group the Canberra Gambling Reform Alliance (CGRA) in 2018 described EGMs in the ACT as being ‘operated at parameter settings outside the Australasian

² The legislation also made EGM taxation more progressive (i.e. a greater proportion of EGM revenue would come from larger venues rather than smaller venues) and introduced a new licensing framework.

regulatory mainstream... particularly... with respect to load up limits, and maximum bets' (Livingstone, 2018, p. 21). The CGRA also commissioned polling which indicated widespread public support for tighter EGM regulation (Anglicare & Canberra Gambling Reform Alliance, 2017).

Public sentiment in favour of EGM reform was confirmed by a general population survey in 2019 from the ANU (Paterson et al., 2019). This study found that 64% of Canberrans agree that EGMs 'do more harm than good in the community', with only 12% disagreeing. Around 71% of Canberrans agreed with the statement that 'people should nominate a dollar amount before they start gambling and not be allowed to spend more (either in venues or in apps)', with just 13% disagreeing.

After the passage of legislation in October 2017, Casino Canberra became eligible to acquire up to 200 poker machines and 60 fully automated table games, subject to it redeveloping the site and adopting harm-minimisation measures. EGMs at the casino would be required to an approved mandatory pre-commitment system and to have \$2 maximum bet limits.

The 2020 election and the Parliamentary Agreement for the 10th Legislative Assembly

Gambling reform was on the agenda once again for the 2020 election. The ACT Labor's election platform for clubs focused mainly on the sectors viability, while also promising 'future optional poker machine licence buyback rounds', and the development of 'a better coordinated and enforceable self-exclusion scheme for patrons who experience problem gambling' (ACT Labor, 2020, pp. 44–45). While the Canberra Liberals' campaign promises did not feature clubs or EGMs prominently, the Greens promised financial incentives for venues going 'pokie free', a further reduction of EGM authorisations to 3,000, and to 'implement stronger harm minimisation measures of \$5 bet limits and \$100 load up limits by the end of 2022 at the latest' (ACT Greens, 2020).

Following the election in October 2020, a Labor-Greens coalition government was once again formed. The new the parliamentary agreement contained elements of both coalition partners' election promises regarding clubs and EGM regulation (see Table 2). Among the key measures, a commitment was made for a 'further reduction in the number of electronic gaming machine licences in the ACT to 3500 by 1 July 2025', a renewed self-exclusion regime and the introduction of 'harm reduction measures of \$5 bet limits and \$100 load-up limits'. This latter measure was conditional on the completion of a 'thorough review and transitional plan to manage impacts on clubs' and was to be scheduled for 'the end of 2022 at the latest'.

Of the five commitments relating to gambling harm reduction under the 10th parliamentary agreement, the first — the establishment of a Community Clubs Ministerial Advisory Council — was most easily implemented. The advisory council is a non-statutory body 'with the purpose of building a long-term, sustainable club sector in the ACT' (Justice and Community Safety Directorate, 2021). It has four seats for government, one for unions, five for representatives of clubs, three for representatives of gambling harm reduction organisations or experts, and one representative of young people. It first met in May 2021.

On self-exclusion, the primary changes made during the 2020–24 term related to the scheme's implementation. Specifically, an improved exclusion database was put in place in 2022. In late 2024, the report on the status of the parliamentary agreement described the self-exclusion reform as 'underway' and noted that the Government is '... continuing to monitor advancements in available technology solutions and products, lessons from reform activity and policy approaches in other jurisdictions and current research' (Chief Minister, Treasury and Economic Development Directorate, 2024, p. 9).

And on commitment 4, no significant harm reduction reforms took place in NSW, so no action was needed.

One additional measure, not flagged in the parliamentary agreement, was also passed during the term. The *Gaming Machine Amendment Act 2024*, originating in a private members bill from Labor backbencher Marisa Paterson, made the Molongolo Valley region of the ACT — a newly developed area that as yet had no clubs with pokies — poker machine free. From 20 February 2024, no EGM authorisations can be issued to clubs in the region. It is the first legislated ‘pokie free’ region in the ACT.

Table 2: Selected gambling reforms in the 10th Parliamentary Agreement

<ol style="list-style-type: none">1. Establish a Community Clubs Ministerial Advisory Council with government, industry and unions to build a long-term, sustainable clubs sector in the ACT2. Target a further reduction in the number of electronic gaming machine licences in the ACT to 3500 by 1 July 2025, and support this through the introduction of incentives for Clubs to consider, including additional incentives to move to zero machines within a venue location3. Establish a rigorous, across-venue self-exclusion regime across the ACT for people experiencing harm from gaming, with significant penalties for breaches. This exclusion regime will align with or exceed reforms currently progressing in NSW to allow exclusion by family members4. Match or exceed any further harm reduction gaming reforms commenced in NSW, such as cashless gaming5. Introduce the harm reduction measures of \$5 bet limits and \$100 load-up limits following a thorough review and transitional plan to manage impacts on clubs, particularly smaller clubs that upgrade machines less regularly. A staged rollout of this reform should commence by the end of 2022 at the latest
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Source: Barr et al. (2020).

Reducing EGM numbers, 2020–2024

At the start of the term, there were 3,868 EGM authorisations in Canberra. Voluntary surrenders were further encouraged by changes to financial incentives in March 2022, with a new allocation of \$1.74 million in incentive payments and an increase in the payment rate to \$20,000 for venues that became ‘pokie free’ (Rattenbury, 2022a). But by the end of the parliamentary term, in September 2024, there were still 3769 EGMs authorised for use, well above the target of 3500 (Gambling and Racing Commission, 2020, 2024). Accordingly, the *Gaming Machine (Compulsory Surrender) Amendment Act 2024*, was passed in September 2024, aiming to reduce gaming machine authorisations to 3500. The bill updated the 2018 amendments to introduce an obligation on the Minister to compel venues to surrender EGM authorisations should voluntary measures not prove adequate to reach the target of 3500 authorisations in July 2025.

Bet size and load-up limits

The parts of the parliamentary agreement that would have laid the groundwork for evidence-based harm reduction measures have not been implemented. The promised ‘harm reduction measures of \$5 bet limits and \$100 load-up limits’ did not ‘commence by the end of 2022’ (Table 2). These were two of the parameters identified by Livingstone (2018) as putting the ACT out of step with other Australian jurisdictions.

To proceed with the commitment to harm reduction measures of \$5 bet limits and \$100 load-up limits, the ACT government led by the Greens leader Shane Rattenbury, Minister for Gaming, sought technical advice about the best method for implementation. A discussion paper in April 2022 outlined Rattenbury’s preferred way to deliver this commitment using a centralised monitoring system (CMS: Justice and Community Safety Directorate, 2022). A CMS would require little change to existing EGMs, instead layering a new flexible system of controls ‘on top’ of those built into EGMs. A CMS connects all EGMs to a network to allow for their

monitoring and control, with capabilities to support tax collection and implement harm minimisation measures such as loss limits. ACT is the only jurisdiction in Australia with EGMs in clubs or hotels that does not operate EGMs through a CMS-like infrastructure (Sathanapally et al., 2024), although their capabilities vary across jurisdictions. Accordingly, implementing the parliamentary agreement's commitment to \$5 bet limits and \$100 load-up limits through the introduction of a CMS would have laid the foundation for future evidence-based harm reduction measures. Rattenbury's plan as circulated in the April 2022 Discussion Paper would have seen a CMS rolled out and operational by November 2024 (Justice and Community Safety Directorate, 2022, p. 14).

However, the clubs sector resisted the implementation of this measure. Between 29 April and 3 June 2022, the ACT government undertook consultation on implementing the parliamentary agreement commitment regarding the bet and load up limits through a CMS. The consultations concluded that while there was general support to reduce harm from EGM gambling, the industry and gambling harm reduction advocates and academics were at odds on how to go about it (YourSay, 2022). The club sector expressed their strong opposition to CMS. Harm reduction advocates, community services and academics generally supported the implementation of CMS due to its capability to implement the evidence-based harm reduction measures. In addition, the submissions collectively outlined several evidence-based harm minimisation measures that are superior to bet and load up limits in reducing harm, including mandatory pre-commitment with strict loss limits. Ultimately, the 'listening report' (YourSay, 2022) did not recommend a path forward, leaving the government to respond with a plan to continue detailed analysis of technical solutions through an industry reference group (Rattenbury, 2022b).

By mid 2023, the Standing Committee on Justice and Community Safety (SCJCS) of the ACT Legislative Assembly engaged with the related question of 'cashless gambling'. At a private meeting on 3 July 2023, the SCJCS resolved to establish an *Inquiry into Cashless Gaming in the ACT*, chaired by Liberal MLA Peter Cain, with membership from Labor MLA Marisa Paterson and Greens MLA Andrew Braddock. Its terms of reference included investigating what 'implementation of card-based cashless gaming technology in the ACT would look like' (SCJCS, 2023). While the focus was on 'cashless gaming' — meaning 'using an EGM without the use of cash' (SCJCS, 2024, p. 6) — there was no consensus among committee members on the question of a CMS (SCJCS, 2024, pp. 8–9). When the inquiry report was published in mid-2024, the committee was split along party lines on the question of whether cashless EGMs should be linked via a CMS (SCJCS, 2024, p. 41).

By March 2024, Minister Rattenbury acted to formally test the market for the provision of a CMS (Rattenbury, 2024). He sought to have a costed CMS model approved by cabinet. However, Rattenbury reported that he had taken a 'proposal for a central poker machine monitoring system to cabinet multiple times without securing government endorsement' (Lindell, 2024b). His proposals were not just rejected, but, he argued, obstructed and delayed by cabinet colleagues (Bladen, 2024b). Rattenbury suggested that Labor was engaging in a 'deliberate political attempt to sabotage the reform that's currently being developed... [with his] cabinet paper being given a go-slow treatment' (Lindell, 2024d). The cause of this resistance, according to Rattenbury, was that ACT Labor were 'impossibly compromised' by its connections to the ACT Labor clubs. When the market testing for CMS costings were delivered in June 2024, they came in at less \$7 million per year for five years³ or 3.75% of gamblers' losses on EGMs. This was less than half of the sum initially estimated by the ACT public service (Lindell, 2024c).

³ The exact costing has not been publicly disclosed. Our estimate of \$7 million per year for five years is based on reporting that the figure is 'less than half' the \$70 million over five years (or \$14 million per year) originally reported.

The dissensus between the coalition partners on the question of a CMS reflected differing plans for the future of EGMs in the ACT. The Greens, on the one hand, supported the implementation of CMS as a platform to implement Territory-wide loss limits which would constrain how much gamblers could lose in a day, week or month, with their account linked across all EGMs in the jurisdiction. This plan went beyond the relatively minor measures of \$5 bet limits and \$100 load-up limits agreed in the parliamentary agreement. Labor described the idea of CMS as a ‘dud’ (Lindell, 2024a). They argued that a CMS would: (a) be costly, (b) be undermined if some gamblers cross the border and gamble in NSW after hitting their limits, and (c) require a contract which would preclude further reductions in the number of EGMs in the ACT (Lindell, 2024a). Labor’s plan was for a gradual phase-down of EGM numbers, from 3500 in 2025 to 1000 in 2045 (Evans, 2024). Critics argued that this plan would (a) take too long to deliver meaningful results, (b) could not deliver the harm reduction outcomes like loss limits that only CMS or similar infrastructure would, and (c) was at risk of being reversed by a future government (Seselja, 2024). Labor also pledged to introduce cashless gambling, although not through a networked system that might provide the infrastructure for Territory-wide harm reduction measures.

In the final parliamentary sitting week before the election, the *Gaming Machine (Compulsory Surrender) Amendment Bill 2024* — which introduced measures for compulsory surrenders to reach 3500 EGM authorisations in 2025 — was subject to its final debate. Labor had reportedly intended to introduce amendments to cut poker machine numbers to 1000 machines by 2045, as per their new policy (Lindell, 2024f). However, after the Greens indicated their support for the measure, the amendments were withdrawn amidst a dispute about intra-coalition communication (Lindell, 2024f). The non-passage of this amendment meant that a promise of 1,000 EGMs by 2045 would form the centre of the Labor Party’s club’s policy for campaign on ahead of the election on October 19 (Lindell, 2024f). In this same sitting week, the Liberals and the Greens united to pass a motion criticising the ACT Labor Party’s connections to the Canberra Labor Club (Legislative Assembly for the Australian Capital Territory, 2024, pp. 2065–2067). Finally, on Wednesday, 3 September, the Chief Minister announced in a social media post (Barr, 2024) that cabinet had agreed to two further measures:

- To introduce regulations that would prevent EGMs from operating between 2am and 10am each day, ‘providing a mandated break in play and reducing harm’ (Barr, 2024)
- To establish an independent inquiry that would devise a plan to maintain the clubs’ revenue, activities and jobs in a context of declining income from EGM gamblers

The parties’ 2024 election promises on the question of EGMs are summarised in the Appendix.

Summary of measures, 2016–2024

In short, few significant EGM reform measures have been implemented over the last two parliamentary terms. The most important measure has been the reduction in machine numbers, which were around 5000 in 2016 and are currently on track to reach 3500 by July 2025. All other reforms — such as establishing an EGM-free Molonglo Valley, withdrawal transaction limits for EFTPOS machines — are unlikely to affect gambling outcomes in the Territory.

In the next section of this paper, we examine the impact of reducing EGM numbers on EGM gambling and gambling-related harm.

The effectiveness of reducing EGM numbers

Literature review

There is relatively little literature that directly addresses the question of the effectiveness of reducing EGM numbers in a jurisdiction. There is considerable evidence that preventing an initial proliferation of EGMs protects residents against gambling harm. For example, in Western Australia where EGMs are restricted to the casino, gambling problems and harm are about one-third lower than in the rest of the country (Russell et al., 2023). Those who live closer to EGM venues in Australia are at increased risk of harm (Young et al., 2012b, 2012a). Storer et al. (2009) noted that a correlation exists at the jurisdictional level between EGM availability and problem gambling, with more EGMs in a jurisdiction correlated with more gambling problems. However, some suggest that this effect may only operate below a certain threshold (Sulkunen et al., 2018, p. 95).

There are only few studies on the effects of reducing limits on the numbers of EGMs in a jurisdiction. One better studied example relates to the introduction of regional caps on number of EGMs in Victoria, which reduced the number of EGMs by 5%. Two studies of this policy did not find evidence of a reduction in EGM expenditure (McMillen & Doran, 2006; South Australian Centre for Economic Studies, 2005). Similar studies in South Australia where EGM numbers were reduced by 15% did not find evidence supporting a reduction in harm, while a reduction in Video Lottery Terminal numbers of 25% in Nova Scotia did result in a reduction in the amount of time and money spent gambling (Sulkunen et al., 2018, p. 96). While the literature is relatively scant, it suggests that reducing EGM numbers does not automatically lead to lower EGM expenditure. Instead, a decrease in machine density may simply result in higher expenditure per machine as poorly performing machines are removed. The extent to which substitution takes place may be related to the size of the reduction (Sulkunen et al., 2018, p. 96), or may be related to the resultant EGM density (i.e. number of people per remaining machine).

These issues were foreshadowed in the ACT in the review by Neville Stevens that the government commissioned in 2018. Stevens noted 'that there is significant underutilisation of gaming machines across the Territory, compared with other Australian jurisdictions' (2018, p. 37). This led him to conclude that 'the proposed reduction in gaming machine authorisations to 4,000 is highly unlikely to reduce gaming machine revenue by a corresponding amount' (Stevens, 2018, p. 37).

Changing EGM numbers in the ACT, 2015–2024

The introduction of forfeiture through the EGM trading scheme, and then the EGM surrender programs have contributed to falling EGM numbers in the ACT. Figure 1 shows the effect on EGM numbers of the trading scheme established in August 2015, the surrender scheme introduced in December 2018, and the increase to voluntary surrender incentives implemented in March 2022. It shows that while forfeitures through authorisation trading have been continuous over the last decade, they have contributed little to the overall reduction in EGM numbers, with only 102 licenses forfeited through trades to date. Voluntary surrenders — paired with the threat of looming compulsory surrenders should voluntary surrenders not be forthcoming — have been the key driver of EGM authorisation reductions. To date, 1,151 licenses have been surrendered via this mechanism, most in early 2019.

Figure 2 shows the density of EGMs in Canberra over a longer time frame. Specifically, it plots the number of EGM authorisations per 1,000 adults resident in the ACT since 2002. It shows that the number of EGMs per 1,000 has been falling consistently since mid-2005 due to population growth, but that the reductions in EGM numbers due to surrender scheme accelerated this long-term trend. Density has halved over the last two decades. While in 2002, there were more than

20 EGMs per 1,000 adults, now there are fewer than 10 EGMs per 1,000 adults. Clearly, both population increase and government policies have contributed to reducing EGM density in the ACT.

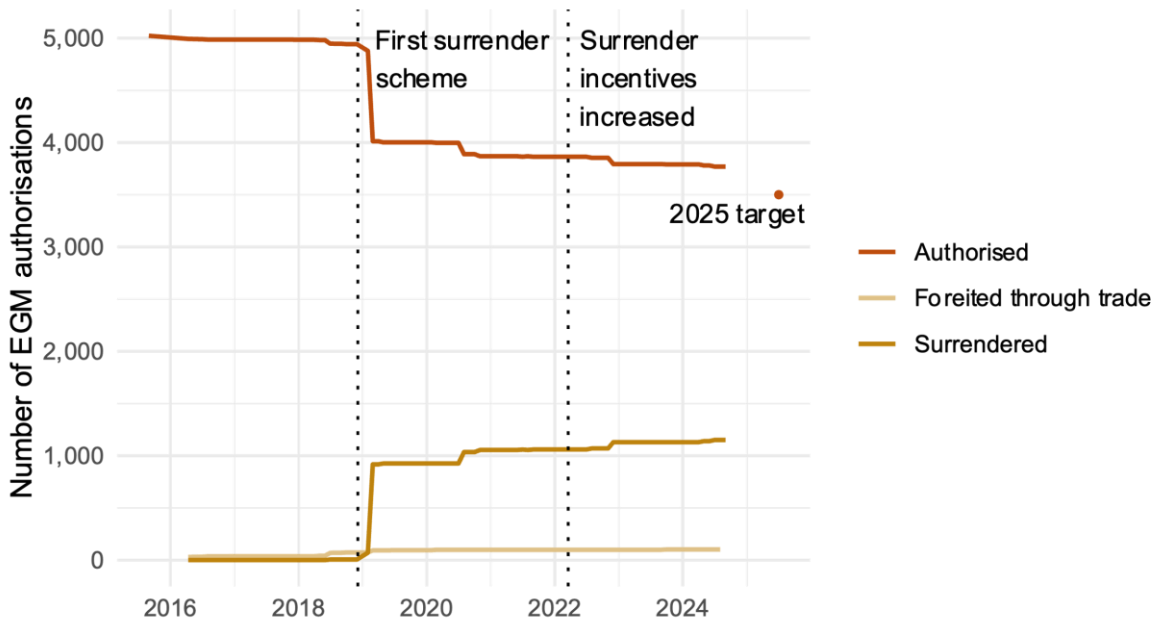


Figure 1: Number of EGM authorisations and mechanism of authorisation reduction, August 2015 – September 2024

Source: Authors' compilation of Trading Scheme Statistics published by the ACT Gaming & Racing Commission.

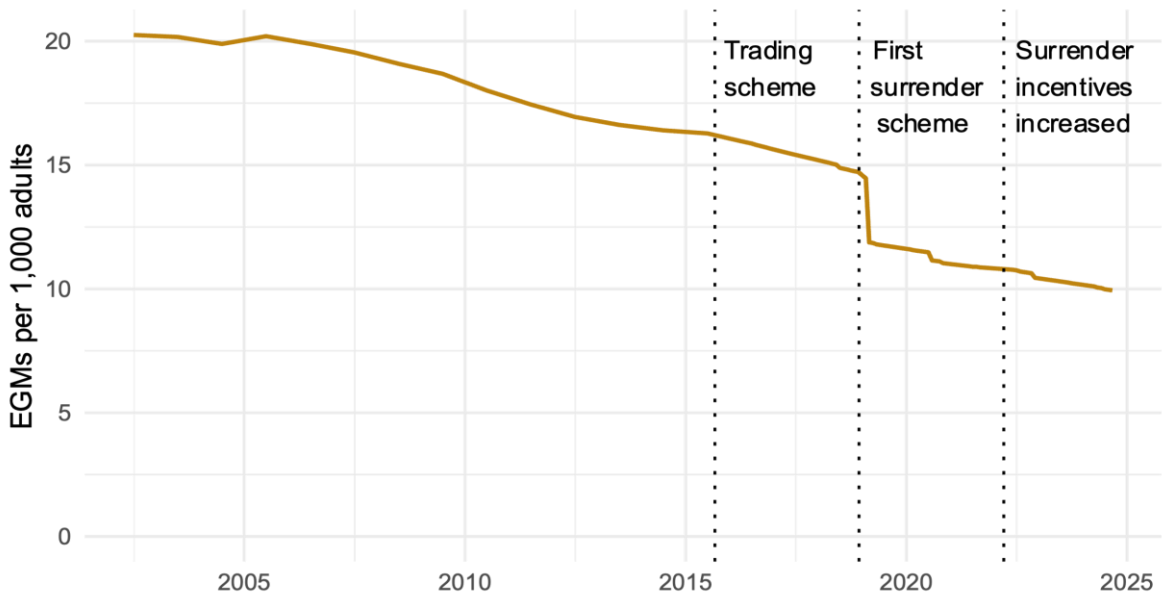


Figure 2: Number of EGM authorisations per 1,000 persons aged 18 years or more resident in the ACT, June 2002 – September 2024.

Sources: Authors' calculations from: Trading Scheme Statistics published by the ACT Gaming & Racing Commission; Queensland Government Statistician's Office (2024); and Australian Bureau of Statistics (Australian Bureau of Statistics, 2024b Table 58).

Notes: Residential adult population has been interpolated for the period 2023-07-01 to 2024-09-30.

Trends in EGM participation and problem gambling

There is little publicly available data to show whether the reductions in EGM numbers have led to reductions in EGM participation, or reductions in gambling related harm. The best evidence on gambling-related harm is derived from three large-scale quinquennial surveys conducted by the ANU for the Gambling & Racing Commission in 2009, 2014 and 2019. The data from 2024 survey is yet to be publicly released.

Table 3 shows the trends in EGM gambling participation and problem gambling indicators over time. Between 2009 and 2014 – prior to the introduction of the EGM forfeiture and surrender schemes – there was a substantial drop in EGM participation, falling from 30.2% to 19.9%. This decline in participation did not result in a reduction in problem gambling, as prevalence remained relatively stable, with no change from 0.5% in 2009 to 0.4% in 2014. From 2014 to 2019, EGM participation saw minimal change, maintaining a level of 19%, while indicators of problem gambling worsened. By 2019, the estimated prevalence of problem gambling rose to 0.8%. The prevalence of any harm (PGSI ≥ 1) almost doubled from 5.4% in 2009 and 2014 to 10.3% in 2019.

These data suggest that gambling-related harm has not fallen in the ACT during the period in which the EGM reforms were introduced. However, there are three caveats to such an observation (Markham & Young, 2016a). First, problem gambling prevalence surveys are a poor instrument for measuring such a change, given the difficulty of measuring problem gambling prevalence with precision. Second, changes in problem gambling prevalence may be related to factors unrelated to EGMs, such as increased participation in sports betting and other online wagering over this period. Third, changes in survey methods between waves of the prevalence survey may have impacted on the comparability of results from year to year. Accordingly, any conclusions from these survey data should be treated with caution.

Table 3: EGM participation and prevalence rates for gambling-related harm in the ACT as measured in ANU surveys, 2009, 2014 and 2019

	2009 % (95% CI)	2014 % (95% CI)	2019 % (95% CI)
EGM gambling participation (last 12 months)	30.2	19.9	19%
'Problem gambling' prevalence (PGSI ≥ 8)	0.5	0.4	0.8
'Moderate risk' gambling prevalence (PGSI 3 – 7)	1.5	1.1	2.5
'Low risk' gambling prevalence (PGSI 1 – 2)	3.4	3.9	7.0
Prevalence of any harm (PGSI ≥ 1)	5.4	5.4	10.3

Sources: Davidson & Rodgers (2010); Davidson et al. (2015); and Paterson et al. (2019).

Notes: In 2009, 5,500 responses were received, 7,068 responses were received in 2014, and 10,000 responses were received in 2019.

Expenditure outcomes at the Territory level

This section analyses how the change in the number of EGMs in the ACT charted in Figure 1 and Figure 2 impacted on expenditure on EGMs. While expenditure on EGMs is not a perfect proxy for gambling-related harm, it is an important intermediate measure. This is because most

gambling-related harms are a direct consequence of losing money, and because money lost on EGMs is strongly correlated with reported symptoms of problem gambling for individuals (Markham et al., 2016).

Figure 3 shows real (i.e. inflation adjusted) expenditure per adult over the period 1997-98 to 2023-24 in the ACT. It has three rough periods. The first, from 1997-98 to 2003-04, was a period of high and stable expenditure, with EGM player losses above \$1250 per capita per year. From there, annual expenditure per adult fell steadily and gradually each year, reaching \$592 per adult in 2018-19. Covid-19 lockdowns affected expenditure for three financial years from 2019-20, before expenditure returned to around \$500 per capita in 2022-23 and 2023-24.

Because of the Covid-19 disruption, it is difficult to visually identify whether the trend prior to the introduction of the surrender scheme of falling per capita expenditure has accelerated due to the reduction in EGM numbers. Figure 4 shows a visual trend analysis that assists in answering this question. It fits a trendline to per capita expenditure over the decade prior to the December 2018 introduction of the surrender scheme. Over this decade, annual expenditure per adult fell by an average of \$37 per year. The graph then extrapolates this trend forward over the next five years of expenditure data. It shows that, had the trend prior to the introduction of the surrender scheme continued, EGM expenditure per adult would have been \$391 per adult in 2023-24. Instead, actual expenditure was \$494 per adult. Accordingly, it is difficult to conclude from these aggregate data that the reduction in EGM numbers between December 2018 and February 2019 has reduced EGM expenditure at the territory level. Indeed, the post-covid expenditure data show that the trend of declining EGM losses in the decade prior to Covid has at best paused and at worst stopped, despite the macroeconomic context of high interest rates and falling real wages.

Figure 5 shows part of the reason for this. It shows real EGM expenditure per gaming machine over the period 2001-02 to 2023-24. Expenditure per machine fell steadily from \$66,000 in 2003-04 to \$42,000 in 2017-18, prior to the introduction of the surrender scheme. In the financial year that included the introduction of the surrender scheme (2018-19) and a substantial reduction in EGM numbers, expenditure per machine increased to \$50,000. In the latest data for 2023-24, EGM expenditure per machine has held relatively steady at \$49,000. This means that the reduction in EGM numbers has led to the remaining EGMs being utilised more heavily.

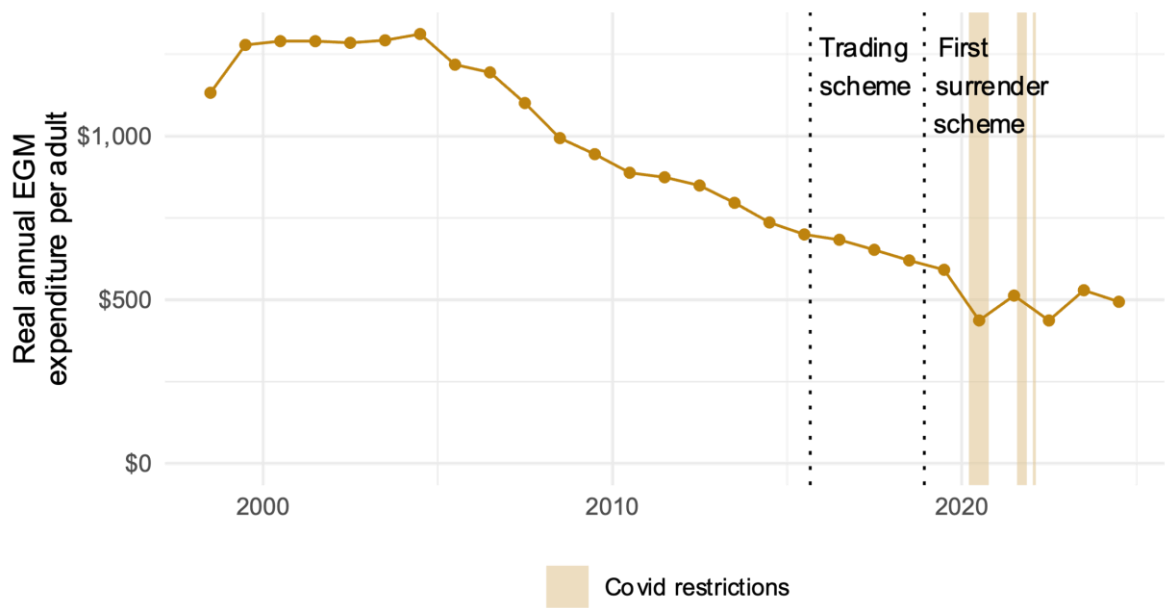


Figure 3: Real annual EGM expenditure per adult and selected policy interventions in the ACT, 1997–98 to 2023–24

Sources: Authors' analysis of data published in Gambling & Racing Commission (2024); Queensland Government Statistician's Office (2024); Australian Bureau of Statistics (2024b, 2024a); Edwards et al. (2022).

Notes: Covid restrictions are based on Edwards et al. (2022) coding for the ACT when restrictions on public gatherings were at 'level 2' or above.

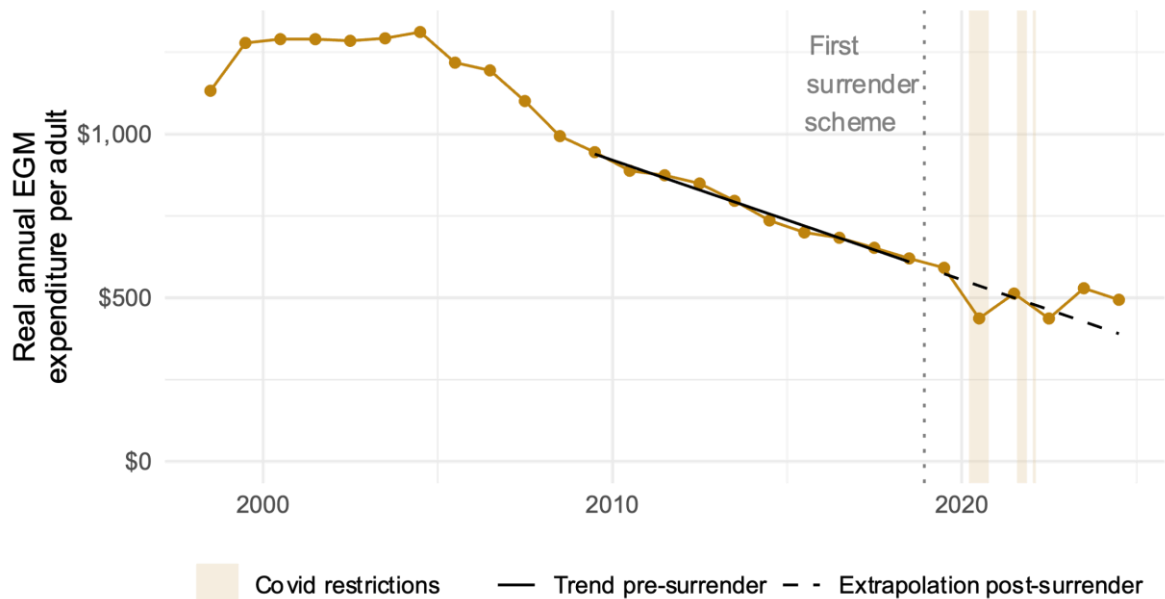


Figure 4: Trends in real annual EGM expenditure per adult before and after the implementation of the surrender scheme in December 2018.

Sources: Authors' analysis of data published in Gambling & Racing Commission (2024); Queensland Government Statistician's Office (2024); Australian Bureau of Statistics (2024b, 2024a); Edwards et al. (2022).

Notes: Covid restrictions are based on Edwards et al. (2022) coding for the ACT when restrictions on public gatherings were at 'level 2' or above.

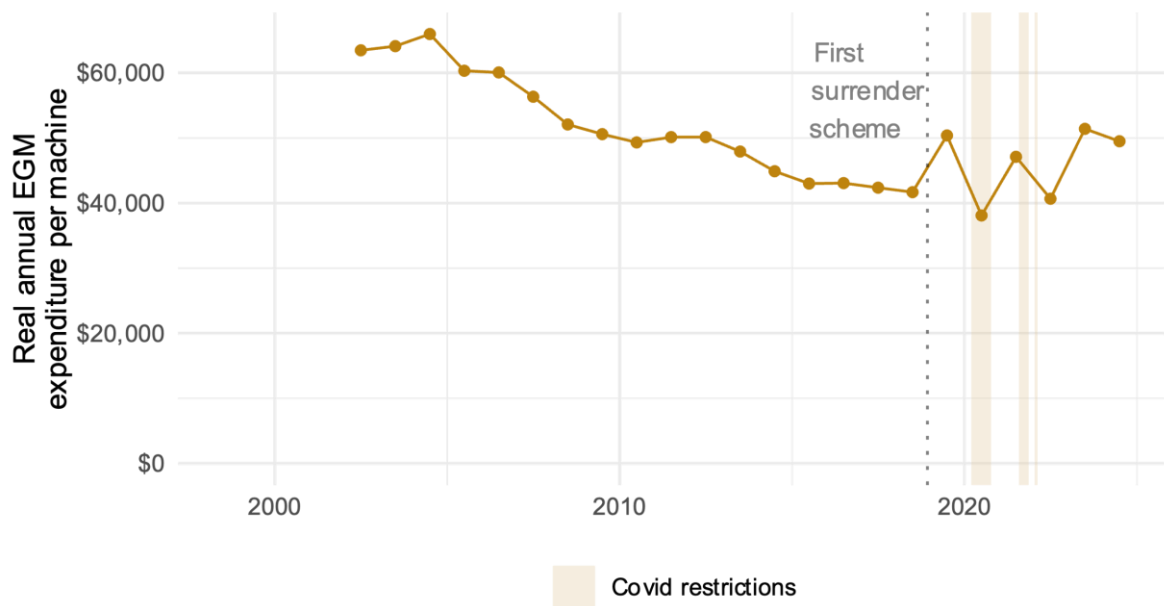


Figure 5: Trends in real annual EGM expenditure per gaming machine, 2001-02 to 2023-24, Australian Capital Territory

Sources: Authors' analysis of data published in Gambling & Racing Commission (2024); Queensland Government Statistician's Office (2024); Australian Bureau of Statistics (2024a); Edwards et al. (2022).

Notes: Covid restrictions are based on Edwards et al. (2022) coding for the ACT when restrictions on public gatherings were at 'level 2' or above.

Expenditure outcomes at the venue level

There is little evidence in the overall jurisdiction level data that decreases in the number of EGM authorisations had any effect on player losses on EGM. However, it could have been the case that expenditure on EGMs fell due to reduced EGM numbers but rose for other, unrelated reasons. Accordingly, in this section we look at venue-level data on EGM numbers and EGM expenditure on either side of the rapid drop in EGM numbers occasioned by the first surrender scheme.

The largest drop in the number of EGMs took place between 30 November 2018 and 28 February 2019 as a result of legislative changes that commenced in early December 2018. According to statistics published by the Gambling & Racing Commission, over this three-month period, the number of authorised EGMs fell from 4985 to 4012. This corresponds with the steep fall in the number of authorisations visible in Figure 1.

We can analyse the impact of this steep reduction in EGM numbers by comparing community contribution reports covering the periods of 2017-18 (i.e. 1 July 2017 to 30 June 2018) and 2018-19 (i.e. 1 July 2018 to 30 June 2019).⁴ These reports contained *venue level* data on:

- gambling losses by EGM venue over the financial year, as well as
- the number of authorised EGMs as at 30 June.

Figure 3 analyses venue level data for venues that had at least one EGM on both 30 June 2018 and 30 June 2019. Panel A compares the change in EGM numbers over this period for venues with the change in expenditure per machine in those venues. It shows that expenditure per machine increased substantially in venues that had reduced their number of EGM licenses. In

⁴ Unfortunately, these reports are no longer published, precluding this sort of analysis being reproduced in future.

other words, as venues gave away more machines, their remaining machines were played more heavily, just as the Stevens report had predicted. Panel B complements this by comparing the change in EGM numbers over this period for venues with the change in total EGM expenditure within the venue. It shows that on average, there is no relationship between the change in number of EGMs and the change in EGM expenditure within the venue.

One limitation of this analysis is that the 2018-19 financial year expenditure data contains roughly five months before the large drop in EGM numbers began, and four months after the largest drop in EGM numbers concluded. However, we would still expect to see some correlation between total expenditure in venue and change in EGM numbers (Panel B) if the scheme was successful in reducing EGM numbers. This is no reason to doubt the validity of our conclusion that there was no relationship between the change in number of EGMs and player loss within the venue.

In summary, we can find no evidence — at the venue level or for the ACT as a whole — that the EGM surrender scheme did anything to change the amount of money lost on EGMs. Rather, within existing venues, remaining EGMs were simply used more intensively. If surrender schemes continue to operate in the same way, we expect that this pattern will be repeated.

It is reasonable to conjecture that there may be some threshold after which further EGM removals may start to result in falls in aggregate EGM expenditure. This may occur through an accessibility effect, as falling EGM venue numbers makes getting to a venue less convenient. Or this may occur through a queuing effect, as EGMs are highly utilised, making some gamblers queue for their preferred machine or leave the venue. The fall in EGM numbers in the ACT in late 2018 and early 2019 were insufficient to cause such an effect. It is unclear what sort of decline in EGM density might precipitate effects of a magnitude that are meaningful to policy.

Table 4 provides cross-jurisdictional statistics which are indicative on this point. The ACT, at 30 June 2023, was close to the Australian average in terms of EGM density (76 per 10,000 persons). The number of EGMs in the ACT would need to fall to around 2,000 to reach the Victorian density of 42 per 10,000. EGMs in Victoria show little sign of over-utilisation, yielding around \$105,000 per year. Accordingly, we should expect no decrease in aggregate EGM expenditure to arise from decreasing the number of EGMs in the ACT to 2,000. Any relationship between EGM density and EGM expenditure is likely to be weak or non-existent, at least up until EGM density is reduced to Victorian levels — and perhaps for some distance beyond.

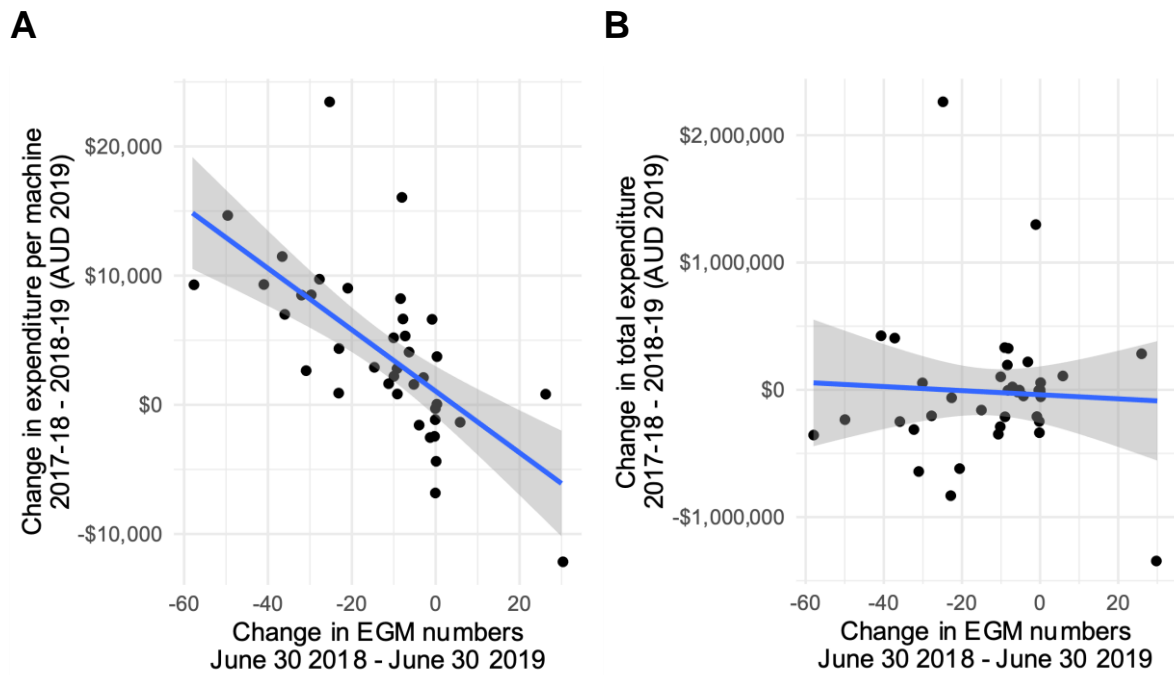


Figure 6: Correlation at venue level of changing EGM numbers between 30 June 2018 and 30 June 2019, and A) change in expenditure per machine, and B) change in total expenditure in the venue

Sources: Authors' analysis of data published in Gambling & Racing Commission (2018, 2019a).

Notes: Each dot represents one EGM venue. All dollar values expressed in 2019 terms.

Table 4: Expenditure per EGM, EGM density, and expenditure per capita by jurisdiction, 2022-23

STE	Expenditure per machine (\$)	EGMs per 10,000 persons	Expenditure per person (\$)
NSW	91,542	106	975
NT	59,548	99	590
QLD	74,190	80	595
ACT	53,024	76	404
AUSTRALIA	84,787	70	591
SA	72,406	68	495
TAS	34,516	58	200
VIC	104,512	42	443

Sources: Authors' calculations from Queensland Government Statistician's Office (2024).

Conclusions

This paper has reviewed changes to EGM gambling policy in the ACT over the period 2016–2024. During this time, the primary policy of note has been the reduction in EGM numbers, from just under 5000 to a target of 3500 in July 2025. While the policy has met its target in terms of reducing EGM numbers, there is no evidence that it has reduced the amount of money lost gambling. Our analysis found that venues that have reduced EGM numbers have not lost EGM revenue as a result. This may be because the quantum of the reduction of EGM numbers has been too small to have an effect. However, it is not clear what scale of reduction would cause EGM expenditure to drop. EGM density would likely have to fall below the level seen in Victoria (equivalent to approximately 2000 EGMs in the ACT) before any impact on EGM expenditure is apparent. Other evidence-based measures to reduce gambling-related harm should also be considered (for an evidence review, see Sulkunen et al., 2018).

Appendix: 2024 election platforms

The election promises of ACT Labor and the ACT Greens are listed below. The Canberra Liberals policy platform has made no specific commitments around clubs or gambling that we have been able to locate (Canberra Liberals, 2024).⁵

Labor has pledged to (ACT Labor, 2024):

- reduce EGM authorisations in the ACT in a staged way, reaching 1000 EGMs or fewer by 1 July 2045
- club sector to diversify their revenue streams through planning and development support
- establish a 'club of the future' in the Molonglo Valley
- introduce mandatory, account based cashless gaming in all ACT venues
- use account based cashless gaming as a mechanism for implementing venue-based self-exclusion
- ban ATMs and EFTPOS withdrawals in clubs

The ACT Greens are promising to (ACT Greens, 2024):

- Introduce a central monitoring system that would support Territory-wide mandatory precommitment with default loss and time limits and Territory-wide self exclusion
- Work with and support clubs to transition away from pokies revenue
- Continue to reduce the number of poker machines in Canberra.
- Restrict gambling advertising
- Ban political donations from gambling licence-holders
- Fund a peak gambling harm reduction body
- Strengthen gambling harm protections in law and regulation, and improve the powers of the regulator

In addition, a cabinet agreement was reportedly reached between Labor and the Greens in the final sitting week to (Barr, 2024; Lindell, 2024e):

- Prevent EGMs from operating between 2am and 10am
- Establish an independent inquiry to advise government on the future of the clubs sector

⁵ As well as searching the Canberra Liberals website, we contacted the office of Mr Mark Parton, Shadow Minister for Gaming and Community Clubs, on October 1st requesting any election commitments that the Canberra Liberals have made regarding gaming machine or clubs policy. At the time of publication, we were yet to receive a response.

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