



IMPLEMENTING THE GOVERNMENT COMMITMENT TO REDUCE GAMING MACHINE AUTHORISATIONS OPTIONS PAPER

JUSTICE AND COMMUNITY
SAFETY DIRECTORATE

AUGUST 2017

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INTRODUCTION

The Parliamentary Agreement 9.1 includes a commitment to “reduce the number of electronic gaming machine licences to 4,000 by 1 July 2020”.

This Options Paper has been prepared by the Justice and Community Safety Directorate. It provides background information relevant to, and sets out options for, achieving a maximum of 4,000 electronic gaming machine authorisations by July 2020. The paper is provided for consultation with key stakeholders, to inform the development of legislation to implement the Parliamentary Agreement commitment.

BACKGROUND - GAMING MACHINE HISTORY IN THE ACT

Legal poker machines were first allowed in NSW registered clubs in 1956 to generate income for improved facilities and amenities for members. The ACT introduced poker machines in 1975, primarily to discourage the growing patronage of nearby NSW clubs by Canberra residents and the subsequent loss of revenue.

In the ACT, since 1975, the possession or use of gaming machines has been regulated.¹ Originally, each ACT venue authorised to have gaming machines had a licence specifying the type and number of gaming machines authorised for the premises.

In 1998 the *Gaming Machine Act 1987* was amended to set the maximum number of gaming machines in the Territory at 5,200. In December 2006, this maximum number (the ‘cap’) was reached. There was no maximum number of gaming machines specified for a club. However the maximum number of gaming machines permitted in individual hotels and taverns was ten and two respectively.

By the time the *Gaming Machine Act 2004* commenced, the potential harms of gaming machines were clear. Consequently, the Act included, as part of the criteria for being issued a gaming machine licence, consideration of harm minimisation strategies.

In January 2007, the then Treasurer requested the Gambling and Racing Commission (the Commission) to conduct a review into the maximum allowable number of gaming machines in the ACT.

The review noted that the ACT had the highest number of gaming machines per capita in Australia, with the second highest per capita expenditure on gaming machines. It also noted that expenditure per machine in the ACT is the lowest of any Australian jurisdiction and that this expenditure is spread unevenly across venues with a number of machines in smaller venues attracting little activity.

Therefore, the review recommended the Government not change the cap but investigate and develop a scheme to allow for the redistribution of machines between gaming venues, without creating a predatory environment that would provide an incentive for larger clubs to takeover smaller clubs.

The *Gaming Machine Amendment Act 2011* introduced a medium to longer term target of 4,000 as the maximum number of gaming machines in the Territory, and this number was to reduce when a licence was surrendered or cancelled (a ‘sinking cap’).

At the same time, multi-venue club groups were given some flexibility to relocate machines between venues (up to a maximum of the lesser of 10 machines or 10% of the existing number of machines)

¹ The *Poker Machine Control Ordinance 1975* was replaced by the *Gaming Machine Ordinance 1987* prior to self-government.

with a shorter social impact statement required instead of a detailed social impact assessment. For the first time, licensees could store up to 10% of their machines without having to provide a reason to the Commission.

New clubs or single-venue clubs could access a pool of up to 150 machines to assist them in building a new venue where the Government was releasing land for club sites.

As at 31 December 2012 in the Territory:

- > the maximum allowed number of gaming machines was 5,024;
- > 4,906 of those were in clubs;
- > 68 were in hotels; and
- > the remaining 50 were allocated to the pool.

GAMING MACHINE (REFORM) AMENDMENT ACT 2015

In 2015, the *Gaming Machine (Reform) Amendment Act 2015* (the Reform Act) introduced the trading scheme for gaming machine authorisations, with the purpose of reducing the number of gaming machines to 15 authorisations per 1,000 adults in the Territory.

The Reform Act also introduced a new licensing framework which separated the eligibility of a club to operate gaming machines from the authority to hold a maximum number of gaming machine authorisations for a particular venue. As a result, a licensee can now operate gaming machines at a number of venues under the one licence, with each venue having its own authorisation certificate that sets the maximum number of gaming machine authorisations for that venue.

When the Reform Act commenced, existing licensees were automatically transferred to the new framework, and were issued with a licence and an authorisation certificate for each venue under the licence. The maximum number of authorisations on the authorisation certificate, and the number of authorisations listed on the schedule, was equal to the number of gaming machines held at each venue just prior to the Reform Act's commencement.

There were 5,022 gaming machine authorisations when the trading scheme started and, by law, this number cannot be exceeded. Thirty seven gaming machine authorisations have since been forfeited, and no authorisations have been surrendered or cancelled.

As at 30 June 2017 in the Territory:

- > there were 50 authorisation certificates, 4,985 authorisations and 32 licensees;
- > 5 of those authorisation certificates related to hotels;
- > 45 of those authorisation certificates related to clubs;
- > 4,502 gaming machines (authorisations) were in operation, 50 of those in hotels and 4,452 in clubs;
- > 163 gaming machines (authorisations) were in quarantine;
- > 138 gaming machines were in storage; and
- > there were 182 authorisations without machines.

REDUCTION TO 4,000 GAMING MACHINE AUTHORISATIONS

Reflecting growing community concern around gambling harm, the Parliamentary Agreement for the 9th Legislative Assembly includes a commitment to reduce the number of gaming machine authorisations in the ACT to 4,000 by 1 July 2020. This means that the ratio of 15 gaming machine authorisations per 1,000 adults will no longer apply and the *Gaming Machine Act 2004* will be amended to apply the new Territory maximum of 4,000 authorisations.

The Reform Act introduced a two phased reduction of gaming machine authorisations across the Territory. Phase 1 commenced 31 August 2015 and applied for the first three years of the trading scheme's operation. This phase provides for a reduction in the number of gaming machines in the ACT through forfeiture requirements. During Phase 1, licensees are able to take any number of gaming machines off the floor and store them for a minimum period of twelve months, and a maximum of three years, under a quarantine permit.

Phase 2 which, under the current legislation, must commence by 31 August 2018, would introduce a requirement that licensees with 20 or more authorisations be required to surrender gaming machine authorisations on a pro-rata basis to meet the ratio. The Minister has discretion to commence Phase 2 at a time earlier than three years, with six months' notice. This would immediately introduce the population based ratio.

The existing compulsory surrender requirements will need to be amended to require licensees to hand back authorisations to meet the maximum of 4,000 by 2020. Based on current numbers, it is expected that approximately 985 authorisations will be subject to compulsory surrender.

In July 2017, gaming machine licensees were provided with the opportunity to provide confidential input on the most appropriate model and timeframes to achieve the maximum of 4,000 gaming machine authorisations by 1 July 2020. Written submissions were received from eight stakeholders and the Justice and Community Safety Directorate met with six stakeholders.

During the consultation process, some licensees recommended that the 4,000 limit should relate to the number of machines in operation, rather than authorisations held, and licensees should be able to continue to hold, or trade, their existing numbers of authorisations. A gaming machine authorisation provides a licensee with the ability to operate a gaming machine. The licensee's decision about whether to operate a gaming machine for each authorisation they hold, or whether to operate a smaller number of machines, is based on the licensee's business requirements.

Gaming machine authorisations that are not operational (that is, against which a machine is not in use), are able to be brought back into use almost immediately and without any further government or regulator approval. The proposal from some licensees that the 4,000 limit not apply to authorisations would provide no certainty that only up to 4,000 machines would be operated under the larger number of authorisations held. For this reason, this paper proposes that to meet the policy intent of the Parliamentary Agreement, a process is required to reduce to 4,000 the maximum number of gaming machine authorisations.

This Paper outlines a number of options for achieving the maximum of 4,000 gaming machine authorisations, including the options for surrender and forfeiture provisions.

POTENTIAL SURRENDER MODELS

OPTION 1 - SURRENDER BASED ON NUMBER OF AUTHORISATIONS HELD BY A LICENSEE

Under this model larger clubs would be required to contribute to the compulsory surrender at a higher rate than smaller clubs. Some stakeholders suggested this would be fairest mechanism for compulsory surrender.

It is proposed that licensees with 19 or less authorisations would remain exempt from compulsory surrender, as they are under the Reform Act.

The following model is proposed based on the number of authorisations held by a licensee (percentages and groupings subject to final government consideration):

Licensee size	Number of authorisations on authorisation certificate	Compulsory surrender requirement
Exempt	19 or less authorisations	No compulsory surrender
Small	20 to 99 authorisations	16% of authorisations to be surrendered
Medium	100 to 199 authorisations	20% of authorisations to be surrendered
Large	200 or more authorisations	24% of authorisations to be surrendered

OPTION 2 - SURRENDER BASED ON REVENUE PER GAMING MACHINE

Under this model clubs that make larger amounts of gross gaming machine revenue per gaming machine would be required to contribute to the compulsory surrender at a higher rate than clubs with lower revenue. Some stakeholders suggested this would be the fairest mechanism for compulsory surrender.

It is proposed that licensees with less than \$8,000 gross gaming machine revenue (GGMR) per gaming machine per year would be exempt from compulsory surrender, to reflect their relative capacity to surrender authorisations.

The following model is proposed based on a licensee's revenue per machine per year (percentages and groupings subject to final government consideration):

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Licensee size	GGMR per gaming machine per year	Compulsory surrender requirement
Exempt	GGMR of less than \$8,000 per machine per year	No compulsory surrender
Small clubs	GGMR of between \$8,000 to \$24,999 per machine per year	16% of authorisations to be surrendered
Medium clubs	GGMR of between \$25,000 to \$37,999 per machine per year	20% of authorisations to be surrendered
Large clubs	GGMR of greater than \$38,000	24% of authorisations to be surrendered

There is a risk that a revenue based surrender model would not reflect the relative capacity of smaller and larger clubs to surrender authorisations.

Mixed views on this model were received during consultation with some licensees concerned that this model may lead to unfair outcomes. Clubs could potentially increase the number of active gaming machines in order to reduce the average GGMR per machine. This may potentially advantage the largest clubs with the most number of gaming machines.

OPTION 3 - REVISED TRADING SCHEME

A revised trading scheme with increased forfeiture rates provides an option for reducing gaming machines in the Territory. Under current trading provisions, one gaming machine authorisation is forfeited to the Territory and taken out of operation for every four authorisations traded.

Since the inception of the trading scheme a total of 37 authorisations have been forfeited, reducing the number of gaming machine authorisations in the Territory from 5,022 to 4,985.

To decrease the number of authorisations in the ACT, a revised trading scheme model could be considered. This could potentially include different forfeiture rates being applied based on licensees' size or revenue. For example:

Licensee size	Number of authorisations on authorisation certificate	Forfeiture requirement
Exempt	19 or less authorisations	one authorisation forfeited for every four traded (status quo)
Small clubs	20 to 99 authorisations	one authorisation forfeited for every four traded (status quo)
Medium clubs	100 to 199 authorisations	one authorisation forfeited for every three traded
Large clubs	200 or more authorisations	one authorisation forfeited for every two traded

However, based on the volume of trading historically occurring, this option alone is not expected to be able to achieve the Government's commitment to reducing the number of gaming machine authorisations in the ACT to 4,000 by 1 July 2020.

The rate of forfeiture to date is also worth noting when considering the extent to which compulsory surrender is necessary. A low volume of trading would mean that little progress would be made to reduce the number of gaming machines through trading forfeiture requirements.

OPTION 4 – HYBRID SURRENDER MODEL

While a revised trading scheme is not expected to meet the Government's policy objectives, a hybrid scheme combining a proportional surrender model (such as option 1 or 2) with increased forfeiture rates for trading gaming machines (option 3) could be considered.

This model would increase the rate at which the number of authorisations are reduced in the Territory, further supporting the Government's commitment to reducing the number of authorisations. In addition, venues wishing to acquire authorisations to return the number of authorisations held to pre-surrender levels, would only be able to do so by further reducing the overall number of authorisations in the Territory.

TIMING OF SURRENDERS

A number of options are available for the timing of compulsory surrenders in order to reach 4,000 authorisations by 1 July 2020. This could range from a model where all authorisations were surrendered at a single point in time to apportioning surrender requirements across a three year period.

OPTION 1 – NO STAGED APPROACH

Gaming machine licensees would be subject to a once off round of compulsory surrender, similar to the existing provisions in the Reform Act. This would be apportioned based on the agreed surrender model. The date of surrender would depend on industry and community consultation, and would ultimately be subject to final government consideration.

This approach would provide no opportunity for industry to adjust, over time, to a reduced number of gaming machine authorisations and introduce diversified revenue streams. In addition, a single surrender approach would impact on the value licensees could obtain when disposing of their physical gaming machines and equipment.

OPTION 2 – THREE YEAR STAGED APPROACH

Another option to achieve the surrender requirements would be to apply a staged approach to compulsory surrender. This would provide industry with time to adjust, with the surrender proposed to be carried out in three stages.

- > Stage 1 - March 2018
- > Stage 2 - March 2019
- > Stage 3 - March 2020

Surrender requirements for each licensee would need to be determined not later than March of each year so that there is time for processes to give effect to those decisions before the end of each financial year, and importantly, before the 1 July 2020 deadline in the final year.

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It is proposed that a fixed surrender rate reflecting differences in club sizes would apply across the three stages of the surrender. This specific surrender rate to apply to each stage of compulsory surrender may vary depending on the number of authorisations forfeited through trading or reduced through the surrender or cancellation of a licence.

Some licensees will move between size groupings over the three stages depending on the number of authorisations surrendered, traded and/or forfeited over this period. This is reflected in the examples provided within this paper.

The number of authorisations to be surrendered by a licensee in a specific stage would need to be rounded up or down to the nearest whole number, with any additional authorisations required to reach 4,000 in Stage 3 deducted off the largest club first.

A specific percentage rate of forfeiture is proposed to apply to each licensee depending on their size. The rate of forfeiture is applied to the number of authorisations a licensee holds at each stage of surrender, not the number held at the commencement of compulsory surrender.

EXAMPLE A

This example provides a staged approach to compulsory surrender. The surrender rates vary across each stage, with the number of authorisations surrendered relatively even (slightly higher in the second stage) across the three year period.

Licensee size	Small (20 to 99 authorisations)	Medium (100 to 199 authorisations)	Large (200 or more authorisations)	Total
Stage 1				
Surrender rate to apply	5%	6.33%	7.66%	-
Authorisations surrendered all licensees in this category	37	135	148	320
Stage 2				
Surrender rate to apply	6%	7.33%	8.66%	-
Authorisations surrendered all licensees in this category	52	136	154	342
Stage 3				
Surrender rate to apply	6.33%	7.66%	9%	-
Authorisations surrendered all licensees in this category	63	132	128	323
Total	152	403	430	985

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EXAMPLE B

During the consultation process, some licensees suggested that compulsory surrender should be staged, with the number of authorisations to be surrendered gradually increasing over time to allow their business models to diversify away from gaming machine revenue.

Similar to the proposed staging outlined in Example A above, this example provides a staged approach to compulsory surrender. The surrender rates vary across each stage, with the number of authorisations surrendered increasing across the three year period.

Licensee size	Small (20 to 99 authorisations)	Medium (100 to 199 authorisations)	Large (200 or more authorisations)	Total
Stage 1				
Surrender rate to apply	3%	4.33%	5.66%	-
Authorisations surrendered across all licensees in this category	23	94	110	227
Stage 2				
Surrender rate to apply	6%	7.33%	8.66%	-
Authorisations surrendered across all licensees in this category	47	147	157	351
Stage 3				
Surrender rate to apply	8.11%	9.44%	10.77%	-
Authorisations surrendered across all licensees in this category	93	156	158	407
Total	163	397	425	985

[Appendix 1](#) provides an example of the potential reduction in authorisation numbers for existing licensees over the three year period.

The distribution of surrender rates across the three years will be considered by government as part of the implementation of this reform.

REDUCTION IN MAXIMUM NUMBER OF AUTHORISATIONS ON AN AUTHORISATION CERTIFICATE

A number of jurisdictions currently cap the maximum number of gaming machines permitted to be operated in a venue. For example, in Victoria clubs are capped at 105 machines, in South Australia clubs are capped at 40 machines, while clubs in Queensland are permitted to operate up to a maximum of 300 machines at a venue. No such cap exists for ACT clubs, however, through the consultation process, some stakeholders raised the possibility of introducing a cap.

When the trading scheme commenced, the maximum number of authorisations on the authorisation certificate, and the number of authorisations listed on the schedule, was equal to the number of gaming machines held at each venue just prior to the Reform Act's commencement.

However a licensee can increase an individual venue's capacity for authorisations. This facilitates licensees acquiring authorisations through the trading scheme. The increase only applies to the licensee's capacity to hold authorisations, not gaming machines. Once a licensee has acquired authorisations, they may then source gaming machines in the open market.

To support the Government's policy to reduce gaming machine numbers across the Territory, consideration should be given to whether all licensees should be able to retain the existing maximum number of authorisations on their authorisation certificate, following the compulsory surrender of gaming machine authorisations.

The compulsory surrender provisions in the Reform Act provide that the maximum number of authorisations on an authorisation certificate will be reduced by the number of authorisations surrendered. For example, a venue required to surrender 10 authorisations would also have the maximum number on their authorisation certificate reduced by 10. Under this approach, venues holding their maximum number of authorisations would not simply be able to acquire new authorisations to replace those surrendered, however, venues with additional capacity on their authorisation certificate would retain that same capacity (rather than the surrender resulting in an increased capacity). For example under existing provisions:

Existing provisions – Authorisation certificate reduced with compulsory surrender

Maximum number of authorisations on authorisation certificate	50
Authorisations held before surrender	40
Compulsory surrender of authorisations	6
Authorisations held after surrender	34
Maximum number of authorisations on authorisation certificate after surrender	44
Number of authorisations that can be acquired through trading scheme	10

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An alternate model could see licensees retain the maximum number of authorisations on an authorisation certificate held prior to the introduction of the surrender requirements. For example:

Authorisation certificate not reduced as part of compulsory surrender	
Maximum number of authorisations on authorisation certificate	50
Authorisations held before surrender	40
Compulsory surrender of authorisations	6
Authorisations held after surrender	34
Maximum number of authorisations on authorisation certificate after surrender	50
Number of authorisations that can be acquired through trading scheme	16

There is an argument for the retention of some trading capacity within authorisation certificates following the compulsory surrender, as if all licensees are holding their maximum number of authorisations, trading cannot occur.

While it makes sense for some capacity to trade authorisations to remain, consideration could be given to whether larger licensees (for example those allowed greater than 150 or 200 authorisations) should have their maximum number of authorisations decreased in line with the number of authorisations handed back as part of the compulsory surrender. This approach would limit the concentration of gaming machines in individual venues and would facilitate a broader distribution of gaming machines throughout the Territory.

If this model was adopted it would have the effect of allowing venues to trade authorisations to small or medium venues, but would not permit larger venues to purchase any additional authorisations (beyond any existing spare capacity they already hold).

It is proposed that licensees would still be able to individually determine the number of their authorisations to operate at each venue, provided they did not exceed the venue's maximum number of authorisations.

For clubs that are seeking to increase the maximum number of authorisations on their authorisation certificate, existing processes would need to be undertaken, including a Social Impact Assessment. Similarly, a licensee could establish a venue at a greenfield site through existing processes and by utilising the authorisations they hold or by acquiring additional authorisations through the trading scheme.

QUARANTINE AND STORAGE PROVISIONS

As part of considerations for compulsory surrender, it would appear appropriate that the quarantine provisions be repealed. These provisions were established as part of Phase 1 of the Reform Act to support structural adjustment within the industry and allow for a set number of authorisations to be quarantined from use during this time.

There is an argument that the more flexible storage arrangements introduced as part of the trading scheme be retained, to retain flexibility for licensees to manage their operational and business needs in a responsive manner.

MAXIMUM NUMBER OF AUTHORISATIONS AFTER REACHING 4,000

The Reform Act included an authorisation tender process, providing the Minister with discretion to release additional authorisations by tender, if the number of gaming machine authorisations dropped below the maximum number allowed. Once the maximum of 4,000 gaming machine authorisations in the ACT has been reached, a model such as the authorisation tender process could be considered.

Alternatively the current formula in the *Gaming Machine Act 2004* where the maximum number continues to be reduced by the number of authorisations cancelled, forfeited and surrendered could be retained.

Comments or questions should be forwarded by COB Monday, 18 September 2017 to:

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IMPLEMENTING THE GOVERNMENT COMMITMENT TO REDUCE GAMING MACHINE AUTHORISATIONS - OPTIONS FOR CONSULTATION

EXAMPLE B

APPENDIX 1

Club Name	Number of Authorisations held as at 30 June 2017	Number of Authorisations surrendered March 2018 (3%/4.33%/5.66%)	Number of Authorisations after 1st surrender	Number of Authorisations surrendered March 2019 (6%/7.33%/8.66%)	Number of Authorisations after 2nd surrender	Number of Authorisations surrendered March 2020 (8.11%/9.44%/10.77%)	Number of Authorisations after 3rd surrender	Total Number of Authorisations Surrendered
Murrumbidgee Country Club	8	Not applicable to surrender					8	0
National Press Club	8						8	0
Civic Pub	10						10	0
Kambah Inn	10						10	0
Kingston Hotel	10						10	0
Mercure Canberra Hotel	10						10	0
Statesman Hotel Motel	10						10	0
Canberra Bowling Club	11						11	0
Canberra Racing Club	14						14	0
Spanish Australian Club	14						14	0
Belconnen Bowling Club	15						15	0
Canberra Club (Barton)	15						15	0
Austrian Australian Club	17						17	0

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Harmonie German Club	20	1	19	0	19	0	19	1
Italo Australian Club	24	1	23	1	22	2	20	4
Yowani Country Club	26	1	25	2	23	2	21	5
Southern Cross Yacht Club	30	1	29	2	27	2	25	5
Canberra Irish Club	36	1	35	2	33	3	30	6
Magpies Belconnen Golf Club	37	1	36	2	34	3	31	6
Canberra Deakin Football Club	40	1	39	2	37	3	34	6
Hellenic Club In The City	40	1	39	2	37	3	34	6
Weston Creek Labor Club	50	2	48	3	45	4	41	9
Canberra North Bowling And Rugby Union Club	50	2	48	3	45	4	41	9
Canberra Club (Manuka)	60	2	58	3	55	4	51	9
City Labor Club	67	2	65	4	61	5	56	11
Belconnen Soccer Club Hawker	67	2	65	4	61	5	56	11
Belconnen Soccer Club McKellar	77	2	75	5	70	6	64	13

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Club Name	Number of Authorisations held as at 30 June 2017	Number of Authorisations surrendered March 2018 (3%/4.33%/5.66%)	Number of Authorisations after 1st surrender	Number of Authorisations surrendered March 2019 (6%/7.33%/8.66%)	Number of Authorisations after 2nd surrender	Number of Authorisations surrendered March 2020 (8.11%/9.44%/10.77%)	Number of Authorisations after 3rd surrender	Total Number of Authorisations Surrendered
Eastlake Football Club	99	3	96	6	90	7	83	16
Raiders Weston	102	4	98	6	92	7	85	17
Magpies Sports Club	106	5	101	7	94	8	86	20
Ginninderra Labor Club	107	5	102	7	95	8	87	20
Calwell Club	114	5	109	8	101	8	93	21
Woden Tradesmen's Union Club	120	5	115	8	107	9	98	22
Canberra Highland Society & Burns Club	130	6	124	9	115	11	104	26
Lanyon Valley Rugby Union & Amateur Sports Club	140	6	134	10	124	12	112	28
Sports Club Kaleen	150	6	144	11	133	13	120	30
Chisholm Sports Club	150	6	144	11	133	13	120	30
Southern Cross Club Jamison	160	7	153	11	142	13	129	31
Mawson Club	165	7	158	12	146	14	132	33
Raiders Belconnen	168	7	161	12	149	14	135	33
Town Centre Sports Club	183	8	175	13	162	15	147	36

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Club Name	Number of Authorisations held as at 30 June 2017	Number of Authorisations surrendered March 2018 (3%/4.33%/5.66%)	Number of Authorisations after 1st surrender	Number of Authorisations surrendered March 2019 (6%/7.33%/8.66%)	Number of Authorisations after 2nd surrender	Number of Authorisations surrendered March 2020 (8.11%/9.44%/10.77%)	Number of Authorisations after 3rd surrender	Total Number of Authorisations Surrendered
Southern Cross Club Tuggeranong	195	8	187	14	173	16	157	38
Ainslie Football & Social Club	198	9	189	14	175	17	158	40
Gungahlin Lakes Golf & Community Club	225	13	212	18	194	18	176	49
Tuggeranong Valley Rugby Union Club	242	14	228	20	208	22	186	56
Hellenic Club Of Canberra	254	14	240	21	219	24	195	59
Raiders Gungahlin	258	15	243	21	222	24	198	60
Southern Cross Club	295	17	278	24	254	27	227	68
Canberra Labor Club	301	17	284	25	259	28	231	70
Canberra Tradesmen's Union Club	347	20	327	28	299	33	266	81
TOTAL	4,985	227	4,758	351	4,407	407	4,000	985



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