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| Consultation on an application to amend the game rules for Electronic BaccaratNovember 2016 |
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## Details of the application

### Amendments to Division 5A – Electronic Baccarat

SkyCity Management Limited (SCML) has applied for the following amendments to the rules for Electronic Baccarat.

#### Removal of prescribed fixed wagering period

SCML has applied to amend the interpretation of the term “fixed wagering period” to remove the prescribed minimum period. The amended rule is set out below. Deletions are shown in strikethrough blue font.

“Fixed Wagering Period” means, in respect of a round of play on a baccarat terminal, the period of time from which wagers may be accepted until the time wagers may no longer be accepted as may be determined by the Casino Operator from time to time ~~provided that such period shall not be less than 39 seconds in each case~~.”

When electronic baccarat was originally approved for use in casinos, the Department considered that a fixed wagering period was required in order to slow down the speed of play. This arose from concerns that electronic baccarat was a particularly fast game and the speed of play could potentially lead to an increase in gambling harm. The fixed period of 39 seconds was intended to slow the game down so that the rate of play was similar to that of electronic roulette.

SCML considers that the fixed wagering period is too long and has slowed down the game so much that players are unwilling to play the game at all. SCML considers that the imposition of similar rates of play for electronic baccarat and electronic roulette is artificial because the two games have nothing in common. SCML notes that roulette is by nature a slower game and players have multiple wagering options which necessarily means the rate of play is slower as players spend longer considering their wagers. In contrast, electronic baccarat has only two primary wagering options, with one additional optional wager.

#### Allowing terminals to be linked to more than one game

SCML has applied to allow electronic table game terminals to be linked to more than one type of game, provided that a player cannot play more than one game at a time. This means that, for example, a player who wanted to change from playing electronic baccarat to playing electronic roulette could do so without having to move to another terminal. A player would be able to play only one electronic game at any one time.

SCML proposes to insert new rules into Division 5A Electronic Baccarat, Division 8A Electronic Roulette, Division 9A Electronic Tai Sai, and Division 10A Electronic Money Wheel.

The proposed new rules are as follows:

New rule 1.3

* 1. For the avoidance of doubt:
     1. Nothing in these rules prevents a casino operator from linking a baccarat terminal to more than one electronic table game (including electronic baccarat, electronic roulette, electronic tai sai and/or electronic money wheel); and
     2. A player may use a baccarat terminal to play more than one electronic table game (including electronic baccarat, electronic roulette, electronic tai sai and/or electronic money wheel)

Provided that only one electronic table game may be activated and played at any one time on a baccarat terminal.

New rule 3.3A

3.3A Where the casino operator operates the game of electronic baccarat and at least one other electronic table game at any one time, then, subject to rule 1.3, the total number of baccarat terminals available to be used in connection with that game of electronic baccarat may be increased by the additional number of terminals available to be used in connection with those other electronic table games.

### Assessment of application against relevant guidelines

The Department of Internal Affairs will form its assessment of the application under the *“Operational Policy Harm Prevention, Harm Minimisation and Responsible Gambling Guidelines”.* These guidelines require the Department to take, in the absence of evidence, a precautionary approach in decision making where there is a reasonable concern that significant and/or widespread harm may occur. In the absence of evidence, the Department makes an assessment of the proposals against known harm determinants.

A copy of the guidelines can be found on the Department’s website at:

<https://www.dia.govt.nz/pubforms.nsf/URL/GamingOperationalPolicy.pdf/$file/GamingOperationalPolicy.pdf>

### Submissions

The proposed amendments described above will be assessed in accordance with the purposes of the Gambling Act 2003. The Department seeks your comment on the applications. Comment in relation to the purposes of the Act is valued, with particular reference to whether any of the proposed amendments will impact on the purposes of:

* preventing and minimising the harm caused by gambling, including problem gambling
* ensuring the integrity and fairness of games
* limiting opportunities for crime and dishonesty
* facilitating responsible gambling.

We ask you to make your submission with these particular purposes in mind. In particular, we welcome comments on whether the proposed amendments may raise harm prevention and minimisation issues that you believe require consideration.

Please address your submissions to [cath.anyan@dia.govt.nz](mailto:cath.anyan@dia.govt.nz) or:

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If you require further information on these proposals, please contact Cath on the above email address or on telephone 04 495 7271.

Submissions must be received by 2 December 2016.

If any amendments are made to the game rules following this consultation, a notice will be published in the New Zealand Gazette stating that the game rules have been amended, made or revoked, and the date on which the changes take effect.