

AUSTRALIAN GAMING COUNCIL SUBMISSION TO IGA INQUIRY INTO SMARTCARD TECHNOLOGY

INTRODUCTION

The Australian Gaming Council (AGC) welcomes the opportunity to participate in the IGA Inquiry into Smartcard Technology.

The focus of the AGC's submission is to address the likely impact of technologies that may be available to facilitate:

- setting of limits on gamblers' use of gaming machines; and
- exclusion of particular gamblers (whether voluntary or otherwise) from access to gaming machines or from the ability to play gaming machines.

ABOUT THE AUSTRALIAN GAMING COUNCIL

The AGC was formed by leaders of Australia's gambling industries in June 2000. Its members are from all sectors of the gambling industry in Australia, including manufacturers, wagering, licensed operators, hotels, casinos and lotteries.

The AGC is committed to a sustainable gambling industry that provides entertainment and economic benefits and one that reduces the potential for people to develop gambling problems.

The AGC's priorities include:

- Establishing a platform of independent scientific knowledge and expert advice on issues related to responsible and problematic gambling behaviours;
- Facilitating high quality, independent and publicly available research;
- Employing the findings of research, scientific knowledge and expert advice to inform public policy, industry practice and community understanding.

The AGC proposes the following objectives for responsible gambling strategies:

- Minimise the incidence of problem gambling by aiming to prevent consumers at risk from developing problems with their gambling;
- Reduce the prevalence of problem gambling by assisting people who have a problem with their gambling¹;
- Preserve the consumer benefits associated with gambling for the vast majority of consumers.

¹ "Incidence is the number of new cases arising in a given time period, and prevalence is the average total number of cases during a given time period", Pathological Gambling: A Critical Review, Committee on the Social and Economic Impact of Pathological Gambling, National Research Council, Washington D.C., National Academy Press, 1999..

The AGC proposes the following principles to guide the development of harm minimisation (responsible gaming) strategies:

- Consumers should have freedom of choice regarding their gambling options;
- Consumers should have the opportunity to make informed and responsible decisions, based on their personal preferences and individual circumstances;
- Problem gambling behaviours are not uniform and strategies to reduce the incidence and mitigate the prevalence must be based on an understanding of the different "pathways"² and profiles that lead to gambling problems;
- Intrusive measures are unlikely to work;
- Addressing problem gambling is a shared responsibility of individuals, industry, governments, community groups and treatment providers – this is consistent with a public health framework approach.
- Outcomes and progress in dealing with and overcoming problem gambling must be measured.³

² Blaszczynski A., Pathways to Pathological Gambling: Identifying Typologies. eGambling, March 2000, Issue 1

³ Blaszczynski A., Ladouceur R., & Shaffer H. J. A Science-Based Framework for Responsible Gambling: The Reno Model. Journal of Gambling Studies, Vol 20 No 3 Fall 2004.

OVERVIEW

1. The AGC states at the outset that in the absence of scientific, independent research and evaluation we can only speculate regarding the impact of smart card technology on individuals.
2. The AGC has assessed the measures proposed in terms of the principles and objectives of the National Framework on Problem Gambling.
3. We note that the National Framework on Problem Gambling, to which the South Australian government is a signatory, reinforces the principle of **research and evaluation** to avoid unintended consequences.
4. In the absence of research on a specific proposal, we have reviewed available research on similar measures and conclude that **player behaviour adapts** to often circumvent the intention of measures.
5. Based on the principle that player behaviour will adapt to new measures, we speculate that players will:
 - a. Tend to set high limits of time and expenditure to keep available options to gamble open.
 - b. Sometimes spend up to that limit – which may be higher than would otherwise be the case
 - c. Seek to borrow or purchase cards on a “black market” to keep gambling options available.
6. With regard to the acceptability and practicality of a proposed mandatory pre-commitment scheme, we raise serious reservations regarding the practicality and enforceability of any such scheme. There is reason to believe, in the absence of a fool proof system, that there will a “black market” trade in cards that will circumvent the intention of the scheme, while imposing serious cost and inconvenience to the majority of consumers.
7. With regard to **self-exclusion** we propose that programs that seek to assist by treatment and counselling individuals, while auditing and requiring transparency on the part of industry, would result in better quality of life outcomes for individuals.
8. We note that the IGA proposal is based on an assumption that players suffer from **loss of control** while gambling. Specifically we note the IGA assumption that “by making a binding commitment to the extent of gambling before starting to gamble, the consequences of impaired judgement will be avoided.” We believe this assumption is unsupported by research and available expert opinion.

We have reviewed the literature related to this assumption, and like IPART, conclude that at best, the available literature is either divided or fails to support this assumption. The AGC is undertaking a more definitive review to better understand this important issue.

THE PROPOSAL

For the purposes of this submission, the AGC has assumed the following characteristics of a card-based system (magnetic stripe, watermark, smart card or biometric card):

- provision for identity verification or account-based gaming;
- provision for a binding pre-commitment of time/money for use of gaming machines;
- provision for limits to be:
 - set by gambler;
 - set at a default limit which the gambler either relaxes or tightens (the former coming into effect after a certain period of time);
 - set by third party; and
 - facilitate enforcement of exclusion from gaming
- Mandatory or voluntary in application.

National Framework and Research and Evaluation

The AGC believes that a meaningful discussion of how to prevent and reduce social harm related to gambling is best understood in a policy framework with clear objectives and principles against which to assess policy options.

For this purpose, we propose to assess the player card proposal against the National Framework on Problem Gambling, agreed to by the South Australian Government and all States and Territory governments, which establishes objectives, principles and key priority areas to address problem gambling.

The National Framework on Problem Gambling states that:

- Research and evaluation is essential to ensure that initiatives are likely to minimise problem gambling without unintended negative consequences for the community.

The first responsibility of policy makers and government is to do no harm and it would be unacceptable that significant new measures were introduced in the field of road safety, for example, without testing for unintended consequences and potential impacts.

The AGC fully supports this principle and we suggest that a meaningful discussion of the potential impact on players of the proposal can only occur by independent, expert and scientific research and evaluation.

Based on the findings of existing research, we believe there is grounds to suggest that the proposal would give rise to significant unintended consequences that would impact negatively on problem and recreational gamblers. This is discussed later in the submission.

We are also aware of several studies being undertaken in Australia and overseas regarding the application of player registration cards and pre-commitment strategies. These are discussed below.

Canada

The Nova Scotia Gaming Corporation (NSGC) has for sometime been reviewing the application of responsible gambling features.

In March 2005 they plan to begin a four staged test of a new responsible gaming device (RGD) that will be conducted on all VLTs in the Windsor/Mount Uniacke area, using 120 recruited players. The responsible gambling device is a unit or console that is attached to existing VLTs with the following features:

- VLT players use a card (like a bank card) which is inserted into the RGD and activated with a Personal Identification Number selected by the player.
- Players can then use their card whenever they start play. The card allows players to use 3 responsible gaming features:
 - Account Summary: feature tracks dollar amount spent, wins and losses;
 - Cash Limit: feature allows players to set specific spending limits for certain time periods and
 - Player restriction: feature allows players to exclude from play for a given period.

The purpose of the research is to evaluate player response to the device, preliminary indications of player attitudes, opinions and any potential behavioural changes as a result of its use. The NSGC then plans to make an informed choice regarding the efficacy of the types of play features and whether the concept should be extended to the entire VLT network.

Queensland

The Queensland Government has prepared technical specifications and outcomes that would be required if venues and operators were to introduce a form of cashless gaming which may include smart card technology.

The technical specifications cover provisions for:

- ensuring integrity and fairness of games;
- probity of those involved in the conduct of gambling;
- minimising the potential for harm from gambling.

The intention is not to introduce "smart cards" but to have a regulatory framework, with appropriate and tested consumer protection measures in place, if new technology is introduced..

Trials are being undertaken to assess player reactions to the new technology. The outcome of these trials will provide critical information and data regarding the potential benefits, practical difficulties and unintended consequences.

Federal/state working party

This National Gambling Research Working Party is undertaking a project to examine pre-commitment via technology to limit gambling losses. This research, commissioned in 2005, will include a period of stakeholder consultation.

Phase I of the study will examine gamblers' current behaviour regarding pre-commitment:

- is pre-commitment currently employed by consumers?
- when and where do consumers decide to pre-commit?
- what do consumers pre-commit to – time/money/strategy?

Phase II of the study will examine the cost-effectiveness of different forms of pre-commitment and the potential of technology to reduce the incidence and prevalence of problem gambling, while minimising interference to recreational players.

Potential Impact on Recreational Players

An additional aspect to be considered is the potential implication of the introduction of smartcard technology for recreational gamblers. Again, due to the absence of relevant research the AGC can only speculate regarding the impact of smart card technology on these individuals. There is likelihood that the use of such technology would cause inconvenience to recreational gamblers and reduce the entertainment value of their activities. A similar phenomenon was observed in Blaszczynski et al (2001) in their study into three proposed modifications to EGMs.

It is important that recreational gamblers are not stigmatised when considering the implementation of consumer protection measures and that policy is balanced to accommodate the needs of all gamblers at each continuum of the gambling scale. This approach is inline with that taken by the Productivity Commission⁴, which focused on balancing costs and benefits versus an unrealistic goal of total harm prevention. The Productivity Commission proposed that rather than "imposing or tightening a constraint on the amount of gambling" policy should "seek to meet the recreational demand for gambling while reducing the social costs associated with each unit thereof."

The Commission went on to state that it "does not favour measures which reduce the social costs of gambling no matter what the sacrifice to the private benefits". Rather, its approach was to "seek ways that, as far as practical, reduce the social costs of gambling without reducing the benefits."

⁴ Productivity Commission 1999, *Australia's Gambling Industries*, Report No. 10, AusInfo, Canberra

Evaluating the Proposal against Objectives

The aim of the National Framework is to:

“minimise the negative consequences of problem gambling to the individual, their family and community through a national approach”.

In absence of specific research evaluating a specific proposal, the AGC is aware of two internationally recognised studies that could provide insight into how players might respond.

Schellinck T, Schrans T, *Responsible Gaming Features on Video Lottery Terminals*, Sept 2003

The Nova Scotia Gambling Corporation introduced “responsible gambling features” (RGFs) to VLTs in May 2001.

These measures were:

- permanent on-screen clocks
- amounts wagered in dollars and cents not credits
- pop-up reminders at 60, 90 and 120 minutes of continuous play
- 5 minute cash out warning at 145 minutes of continuous play and mandatory cash out at 150 minutes.

Focal research consultants, Dr Tony Schellinck and Tracy Schrans were commissioned to review the impact of the new machines in moderating problem gambling behaviours and to examine:

- Awareness and exposure to features
- Effect on player behaviour, perceptions and attitudes
- Possible improvements to RGFs to enhance their effectiveness in mediating excessive play (according to the Canadian Problem Gambling Index).

The results were mixed.

- The percentage of times players reported losing track of the time or money, or playing beyond desired time limits, declined for all players, most strongly for those taking up regular play on new machines.
- The average session duration declined marginally for those switching to new terminals from 136 minutes to 114 minutes
- There was no significant change in the average amount spend
- On a machine basis, the average amount spent increased. The amount of expenditure was higher on new machines than on the old terminals
- Players increased the speed and intensity of play on being given the “5 minute” cash out warning
- Players rated the bill acceptors as more effective than some of the other RGFs in assisting them to manage their and money spent – players noted that it assisted them to set a budget.

Blaszczynski A., Sharpe L., Walker M., *the Assessment of the Reconfiguration of Electronic Gaming Machines as Harm Minimisation Strategies for Problem Gambling, November 2001*

The study examined three proposed modifications to EGMs:

- Removal of note acceptors
- Slowing the speed of play
- Reducing the maximum bet from \$10 to \$1

The impact of these measures was evaluated for problem gamblers and recreational gamblers. The results indicated the following:

- removing note acceptors had no impact on “harm minimisation” and was neutral in terms of enjoyment
- slowing the speed of the game had no impact on “harm minimisation” and decreased the enjoyment factor for recreational players. Problem gamblers spent the same amount of money, but took longer to do so, which the authors indicated may have compounded the harmful effect of their gambling behaviour in terms of family and work commitments.
- reducing the maximum bet had some impact on problem gamblers and increased their enjoyment factor, but reduced it for recreational players.

Implications of Research

The two studies discussed above indicate that there is serious grounds to suggest that player behaviour is goal driven and adapts to changed conditions – that is, players adapt their behaviour to achieve the same goal as before, ie they will spend the same amount of money in response to slower play, but take longer to do so, they will increase the speed of play and level of wager in response to a timed payout. The adaptation of player behaviour may explain in part why estimates of problem gambling incidence rates are similar despite variations in types of machine, EGMs versus VLTs, with or without note acceptors, clocks, etc.

Based on this principle we can speculate as to how player behaviour may seek to adapt in response to the proposed player cards.

How can player behaviour be expected to adapt?

Expenditure and Pre-commitment limits

If we know player behaviour is likely to adapt, what could we expect?

One likely scenario is that players who enjoy gambling will set a high limit, so as not to limit their opportunities or choice to gamble. This could be compared to setting a credit card limit – although you only expect to spend \$100, you set the limit at \$1000 to cover all foreseeable circumstances. This would have the effect of legitimising expenditure up to that amount, which may be beyond what an individual would have spent in the absence of player cards.

This scenario is supported, in part, by comments made by University of Sydney (Gambling Research Unit) submission to IPART.

They note:

“One of the defining features of the problem gambler is the propensity to chase losses. When losing, the problem gambler becomes more strongly convinced that a major pay-out will soon occur (Ladouceur in print). Any mechanism that prevents the player from receiving the wins or bonuses expected is likely to be rejected.”

For this reason, problem gamblers are likely to set higher limits. Financial counsellors suggest that “The problem is people’s credit card spending is more based on the limit on the card than anything else. They’ll say “I can use the card because I still have more room”. (*Steve Rhode, President of MyVesta, counselling service, Canada*).

In so far as this may be the case, a mandatory pre-commitment program would be expected to have a detrimental effect on at risk and problem gamblers.

If a **mandatory spend limit** is introduced there are a number of serious practical issues to be addressed, the most obvious of which is how to determine a limit.

The University of Sydney submission suggests a “pokie card” scheme could be operated by banks according to the same principles as credit card schemes. “A pokie card would enable the user to borrow against the bank up to an agreed maximum. Monthly payments could be made as with any credit card scheme”.

The AGC has serious reservations regarding a scheme run along these lines.

From a practical and cost point of view, we see no reason why banks would want to be involved in providing credit assessments for gamblers. This process would be extremely intrusive and violate individual freedom of choice.

Secondly, under no conditions should players associate using “credit cards” or playing with credit, when gambling.

Finally, such extremes are unwarranted in comparison with the way we treat individual’s freedom of choice to purchase any other product or service.

We are also aware of a system that operates in Missouri whereby players are required to register at the casino and whereby they are allowed to spend a limit of \$500 in each two hour period. Once the limit is reached, players are required to wait for two hours to lapse if they wish to continue to gamble. In practice the intention of the measure is circumvented by consumers borrowing someone else’s card or simply sitting in the restaurant until two hours has lapsed (Nower and Blaszczynski in print).

Feasibility and Practical Issues

The AGC has serious reservations regarding the practicality of such a scheme. Using the model proposed by Professor Mark Dickerson, consumers would be required to “pre-commit” to play at a place away from point of purchase, for example a post-office or newsagent. They would be required to show

identification (presumably 100 point) prior to being able to purchase a card to play.

Under these circumstances, there would be several practical problems, not least of which involves consumer acceptance of the scheme. Consumers are likely to be extremely resistant to measures that place such extreme barriers to play, which presumably are targeted at a small number of people who consistently or occasionally spend more than they intend.

We would not be surprised if, by placing these barriers, there is a sharp decline in the number of people choosing to play egms – it would all be just too hard.

Customers likely to continue to play however, may those who are prepared to go to great lengths, including the purchase of cards on the black market that will inevitably emerge in response to such a scheme. A black market in cards would seriously undermine the intentions of the scheme and allow, for example, players who have exceeded their pre-commitment or who have self-excluded or been excluded, to continue to play.

Self-exclusion

The IGA has also asked for comments regarding the anticipated impact of the player card scheme on the self-exclusion program.

In 2004 the AGC released a discussion paper **Current Issues – Self-Exclusion: A Gateway to Treatment**, by Professors Blaszczyński, Ladouceur and Nower.

The authors make a number of important points regarding successful recovery and self-exclusion.

Firstly, self-exclusion is not a treatment in itself – it simply provides some road blocks between the individual and gambling. This should be made clear to individuals at the outset.

When an individual puts their hand up to be self-excluded, they are likely to be receptive to a range of treatments and services to address underlying issues related to their problem gambling behaviour. Access to treatments available from counselling, stress coping skills, and assistance with financial management is important in maintaining their motivation and avoiding relapse.

Without this support, self-exclusion merely becomes an exercise in “policing” while issues remain unresolved and in some cases, the maladaptive coping mechanisms shift the problem elsewhere.

The authors also recommend that industry be required to train staff and implement procedures to provide a workable system for self-exclusion, which should be subject to independent audit and the results made publicly available.

This philosophy represents a shift from a punitive approach to an individual centred focus where the emphasis is directed towards a gateway for education and treatment. Ultimately, this active intervention in the form of a support, education and counselling model will promote a long term improvement in the individual's quality of life.

The AGC recommends to the IGA, the approach proposed by Blaszczynski, Ladouceur and Nower.

In relation to the player card system our first concern is that self-excluded individuals, in the absence of an integrated approach to treatment, would seek to gain entry to gamble by cards gained via a black market or borrowed from other individuals. This is the case in Missouri (discussed above). Also in the absence of appropriate treatment, players would develop maladaptive coping mechanisms and may develop other behavioural problems that impact negatively on their personal and family circumstances (find material to substantiate), such as taking up other forms of gambling, alcohol or drug abuse.

Loss of Control

The AGC would like to make specific comment on the assumption made by the IGA, which underpins the player card proposal.

The discussion paper assumes that “by making a binding commitment to the extent of gambling before starting to gamble, the consequences of impaired judgement will be avoided”

This statement assumes that players suffer from impaired judgement when playing EGMs. The Independent Pricing and Regulatory Tribunal (IPART) acknowledged a lack of consensus regarding loss of control as a factor determining problem gambling behaviour and recommended national research to review the potential impact of smart cards or pre-commitment strategies.

We have summarised below a review of material relating to “zoning out” and loss of control.

In behavioural theory, “zoning out” has been compared to dissociation. It must be stressed that dissociation is still in dispute in the medical world⁵, however it has been suggested that dissociation is best understood as a continuum – it is common and nearly everyone experiences mild dissociation from time to time.

For example, driving a car and suddenly realising that you have little or no memory of driving for the last few minutes, is dissociation. You are still able to drive the car, but the thinking mind is not focused on driving, but somewhere else. Daydreaming is a very mild form of dissociation.

At the other end of the scale, it has been suggested that dissociation (Bernstein & Putman 1986) can often be a way to escape the memory of a traumatic experience or a chronic stress condition, reactions being dissociative identity disorders.

According to Durand Jacobs' (Clinical Professor of Medicine, Loma Linda University Medical Center, California, USA) theory of addiction (Jacobs, 1982; 1986), dissociative states are common to all forms of addiction and permit the individual to escape from psychological distress. Gambling binges can provide a solution to what might be long standing and underlying problems. In an altered state of identity, mood and self-confidence can be dramatically improved, ie players feeling “invincible”.

Jacobs suggests that gambling can therefore be used as an analgesic to treat other conditions. According to Jacobs, until the player acquires more effective coping

⁵ Kihlstrom, John F (2005). Dissociative Disorders. *Annual Review Clinical Psychology*, 1:10.1 – 10.27

strategies for dealing with daily or underlying problems, the problem gambling behaviour will continue. He suggests it is a common goal of all addictive patterns of behaviour – it is extremely rewarding and reinforcing and plays a role in maintaining the “addiction”.

According to Jacobs, “the frequency and types of dissociative reactions reported by players indicated the extent to which the person chooses to progressively separate him or herself from ordinary, mildly challenging to highly aversive reality situations.”

A key point therefore, is that a dissociative state may be sought in an attempt to relieve depression, loneliness or stress.

Several studies have sought to measure dissociation and gambling. They use Jacob’s index of dissociation.

Gupta and Derevensky (1998) used the dissociative scale to measure dissociative behaviours of adolescents while gambling. There are 5 questions:-

1. Feels like in a trance
2. Feels like a different person
3. Lose track of time
4. Experience blackout
5. Feel outside of self

Losing track of time and feeling like a different person, were the most frequently reported types of dissociation for regular and problem gamblers. Both groups also reported that their primary reasons for gambling are for enjoyment and excitement followed by the desire to win money. Occasional gamblers and problem gamblers both reported gambling to promote relaxation. Problem adolescent gamblers, however, were more likely to report gambling for “social involvement” to escape problems, to relieve their feelings of depression, to feel older or to escape loneliness.

Diskin and Hodgins (1999) studies the Narrowing of Attention and Dissociation in Pathological Video Lottery gamblers and concluded that “pathological gamblers were slower than occasional gamblers to respond to external light stimuli, had significantly higher scores than the occasional gamblers on the Dissociation Experiences Scale and reported a greater number of dissociative experiences when gambling than did occasional gamblers”.

Grant and Kim (2003), investigated whether there is a link between dissociations and “pathological” gambling, using the Jacobs’ index of dissociation; they concluded that pathological gamblers “do not appear to experience dissociative symptoms at a rate significantly different from those found in normal controls.”

Dickerson (2003) argues that regular egm players experience an “irresistible urge” to continue to gamble and argues that reduction in harm from gambling can only be achieved by targeting regular players and requiring them to set pre-committed spend limits for time and money away from the venue.

Ladouceur (2004) argues however that Dickerson’s “views” are not supported by data – they are in fact opinion. He suggests that being distracted while gambling is a natural experience and argues, “imposing control is an intrusive measure which could be deleterious to the gamblers”.

Blaszczynski (2001) suggests that dissociation is a “fuzzy term” and that Jacob’s overcomplicates matters. He suggests that problem gambling can be “more

easily described by the simpler possibility that gambling is an intrinsically exciting and enjoyable pastime pursued for its own sake, much the same as people seek out any enjoyable activity such as chess, sports or watching movies."

He suggests that dissociation while gambling can be understood more easily as distraction. Blaszczynski puts forward 3 types of problem gamblers, "normal" pathological, emotionally vulnerable and biologically disposed. Jacob's theory, he suggests, only applies to the emotionally vulnerable. Problem gambling can be a habitual pattern of behaviour, with no underlying morbidity, and once established, the range of stressful internal and external events can precipitate the drive to carry out the behaviour.

The AGC is currently facilitating a project to better understand what is meant by "loss of control" or "zoning out", its clinical significance, implications in terms of both the prevention and treatment of gambling problems. We would be pleased to share the results of this work with the IGA.

References

Bernstein, E.M., & Putnam, F.W. (1986). *Development, reliability, and validity of a dissociation scale*. Journal of Nervous and Mental Disease, 174, 727–735.

Blaszczynski (2001). *Author's Response to Reviewers' Comments (Gambling-Induced Analgesia: A Single Case Report)*.

Blaszczynski, A., Ladouceur, R., & Nower, L, (2003). *Self Exclusion: A Gateway to Treatment*.

Blaszczynski, A., Sharpe, L. and Walker, M, (2001). *The Assessment of the Impact of the Reconfiguration on Electronic Gaming Machines as Harm Minimisation Strategies for Problem Gambling*, University of Sydney Gambling Research Unit, Sydney.

Department of Family and Community Services, (2004). *Ministerial Council on Gambling National Framework on Problem Gambling*.

Dickerson, M., (2003). *Exploring the Limits of "Responsible Gambling": Harm Minimisation or Consumer Protection?*. Gambling Research (Journal of the National Association for Gambling Studies Australia), 15, pp 29-44.

Diskin, K.M. & Hodgins, D.C. (1999). *Narrowing of attention and dissociation in pathological video lottery gamblers*. Journal of Gambling Studies, 15(1), 17–28.

Grant JE, Kim SW, (2003). *Dissociative symptoms in pathological gambling*. Psychopathology. Jul-Aug; 36(4): 200-3.

Gupta, R. & Derevensky, J.L. (1998). *An empirical examination of Jacobs' General Theory of Addictions: Do adolescent gamblers fit the theory?* Journal of Gambling Studies, 14(1), 17–47.

Independent Pricing and Review Tribunal, (2004). *Gambling: Promoting a Culture of Responsibility*, New South Wales, Independent Pricing and Review Tribunal.

Jacobs, D.F. (1986).

Jacobs, D.F. (1982). *The Addictive Personality Syndrome (APS): A new theoretical model for understanding and treating addictions*. In W. R. Eadington (ed.), *The Gambling Papers: Proceedings of the Fifth National Conference on Gambling and Risk Taking*. Reno, Nevada: University of Nevada Press.

Ladouceur, R (2003). A Review by Professor Robert Ladouceur PH.D of Dickerson, M., Haw, J., & Shepherd, L, (2003). *The psychological causes of problem gambling: a longitudinal study of at risk recreational EGM players*."

Lazarony, Lucy (1998) quoting Steve Rhode, President of MyVesta Counselling Service, Canada). *"Don't let explosive debt rule your life: Set your own credit card limits"*. Bankrate.com.

Productivity Commission, *Australia's Gambling Industries (1999)*, Report No. 10, 3 Vols, 26 November.

Schellinck, T., & Schrans, T, (2002). *Atlantic Lottery Corporation Video Lottery Responsible Gaming Feature Research - Final Report*. Focal Research Consultants Ltd.

University of Sydney Gambling Research Unit (2003). *Submission to the Independent Pricing and Review Tribunal Review into Gambling Harm Minimisation Measures*.