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AUSTRAC Consultation on Card-Based EGM Play

Member clubs are advised that AUSTRAC has distributed a letter, found here, outlining its position on the treatment of card-based EGM play.

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In the letter, AUSTRAC advises that the provision and play of EGMs through accounts, such as member cards with player account functionality, is likely to trigger additional AML/CTF obligations beyond those applying to cash-based EGM play.

AUSTRAC has committed to undertaking further engagement with the sector on this issue to determine what action is necessary, which may include the development of additional guidance, amendments to the AML/CTF Rules, and/or customer due diligence exemptions or modifications, if necessary.

In the meantime, AUSTRAC has advised that clubs can continue to maintain their existing risk management frameworks.

ClubsNSW, through Clubs Australia, has been actively engaging with the regulator on this matter and will continue to do so through this consultation process.

Considerations for clubs' AML/CTF frameworks

Under the AML/CTF reforms, the exemption for EGM providers from conducting initial customer due diligence was reduced to apply to payouts below $5000.

This exemption does not apply to the issuing of player accounts used to play EGMs.

For member cards where player account functionality is not activated, initial customer due diligence is not required.

For member cards where this account functionality is available, initial customer due diligence should be undertaken before the account functionality is activated.

Greater detail on initial customer due diligence requirements is available on AUSTRAC's website.

AML/CTF advisers

ClubsNSW has prepared a non-exhaustive list of AML/CTF advisers you may consider engaging if you require formal advice specific to your venue, available here. Your own research may identify other advisers you may also consider engaging. ClubsNSW does not endorse any particular person on this list.

If you have questions about general AML/CTF obligations, please contact ClubAssist via email at enquiries@clubsnsw.com.au, or phone 1300 730 001.

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