

IN THE MATTER of the Gambling Act 2003

AND on an application by **SKYCITY CASINO MANAGEMENT LIMITED** for approvals relating to Baccarat and Tai Sai Games at the Auckland, Hamilton and Queenstown Casinos

BEFORE THE GAMBLING COMMISSION

Members: S W Hughes KC (Chief Gambling Commissioner)
S C L Pearson
W A Acton
S T Shaw
C M Risk

Date of Application: 23 June 2026

Date of Decision: 9 July 2026

Date of Notification of Decision: 17 July 2026

DECISION ON AN APPLICATION BY SKYCITY CASINO MANAGEMENT LIMITED FOR APPROVALS RELATING TO BACCARAT AND TAI SAI GAMES AT THE AUCKLAND, HAMILTON AND QUEENSTOWN CASINOS

Introduction

1. SKYCITY Casino Management Limited ("**SCML**") applied to the Commission, pursuant to condition 10 of its operator's licences for the Auckland, Hamilton, and Queenstown casinos, for two approvals. First, for approval not to use "indicator pucks" on its Baccarat tables at the Auckland, Hamilton and Queenstown casinos; and secondly, for approval to deploy electronic audio and visual features on the Tai Sai tables at the Auckland and Hamilton casinos.

Licence condition

2. The relevant licence condition (which is identical for all three venues) is as follows:

Auckland, Hamilton and Queenstown casinos (operator's licences)

10. The approval of the Commission is required prior to the use by the operator of any electronic version of the game types specified in condition 9 above or electronic aids or enhancements or changes to table game rules which create new wagering opportunities.

Relevant sections of the Act

3. The relevant sections of the Act are as follows:

3. Purpose

The purpose of this Act is to—
(a) control the growth of gambling; and

- (b) prevent and minimise harm from gambling, including problem gambling; and
- (c) authorise some gambling and prohibit the rest; and
- (d) facilitate responsible gambling; and
- (e) ensure the integrity and fairness of games; and
- (f) limit opportunities for crime or dishonesty associated with gambling and the conduct of gambling; and
- (g) ensure that money from gambling benefits the community; and
- (h) facilitate community involvement in decisions about the provision of gambling.

11. No increase in casino gambling

A person must not increase the opportunities for casino gambling.

12. What is increase in casino gambling

- (1) Decisions on what constitutes an increase in the opportunities for casino gambling are a function of the Gambling Commission.
- (2) An increase in the opportunities for casino gambling includes but is not limited to—
 - (a) an increase in the number of gaming machines unless the increase is accompanied by a reduction in the number of table games that the Gambling Commission believes is proportionate;
 - (b) an increase in the number of table games unless the increase is accompanied by a reduction in the number of gaming machines that the Gambling Commission believes is proportionate;
 - (c) an increase in total player space at table games unless the increase is accompanied by a reduction in other opportunities for casino gambling that the Gambling Commission believes is proportionate.
- (3) Opportunities for casino gambling are not increased—
 - (a) by increases, in the Auckland casino, that comply with the Order for the Variation of Conditions of Casino Premises Licence dated 6 December 2002;
 - (b) by gambling conducted by TAB NZ referred to in section 120.

SCML's application

4. SCML submitted, in summary, as follows:

- (a) Pursuant to condition 10 of its operator's licences, Commission approval is required prior to the use by the operator of any electronic version of the game types specified in condition 9, or electronic aids and enhancements or changes to game rules which create new wagering opportunities.

Indicator pucks on Baccarat

- (b) The Secretary approved a variation to the Rules of Baccarat which took effect on 1 June 2025. That variation amended Rule 3.4(e). Previously the rule required two round indicator pucks be used to indicate "Player" and "Banker" when dealing styles B or D are used. The rules now permit the use of the indicator pucks at "the option of the Casino operator".

- (c) It wants to take up the option afforded by this rule change and not use the pucks at the Auckland, Hamilton and Queenstown casinos, pursuant to condition 10, when dealing styles B or D are used. At present, Baccarat dealers place the pucks while players are placing their bets, so dispensing with the requirement to do so will have no effect on game speed and will not increase wagering opportunities.

Tai Sai Enhancements

- (d) It wants to complement the existing Tai Sai game features with additional audio and visual features. For example, an audio feature may play when the dice are shaken and may state things such as, “place your bets”, “no more bets”, or it may announce the winning dice combinations. The audio could be a spoken phrase and/or sound effect.
- (e) The visual features will provide a visual cue on the occurrence of a particular game event through a light or electronic display. Along with the dealer (and/or the audio feature, if approved), a coloured light or other electronic display will provide a visual cue that the event has occurred. This visual cue may also assist the Surveillance team in monitoring the games.
- (f) It seeks approval to adopt these audio and visual features on the Tai Sai tables at the Auckland and Hamilton casinos, pursuant to condition 10. These proposed features will replicate or enhance existing game features, will not increase the speed at which the game is played and will increase its ability to check the integrity of game operations. Similar audio and visual enhancements on the Baccarat and Roulette tables were approved by the Commission in decision GC06/23.

Secretary’s submission

- 5. The Secretary submitted that he has no regulatory concerns with SkyCity’s proposals. The changes do not introduce new wagering opportunities, will not increase game speed and will not adversely affect game integrity. The Tai Sai enhancements replicate or supplement existing game features and may assist with the monitoring of game operations.

Analysis

- 6. SCML sought the Commission’s approval not to deploy indicator pucks on its Baccarat tables that deploy dealing styles B or D. The approval, if granted, would apply to all three SkyCity casinos. SCML also sought the Commission’s approval to deploy electronic audio and visual features on its Tai Sai tables. The approval, if granted, would apply to the Auckland and Hamilton casinos.
- 7. The approvals were sought pursuant to condition 10 of the operator’s licences for the specified venues because the proposals have the potential to increase the speed of the games and therefore, to increase opportunities for casino gambling. Section 11 of the Act provides that no

person can increase opportunities for casino gambling, with condition 10 providing the Commission with a mechanism to ensure that increases in casino gambling opportunities do not occur by virtue of the unsanctioned adoption of technical improvements which may have the effect of increasing casino gambling opportunities above the previously assessed control limits already in place.

Audio and visual enhancements for Tai Sai

8. The Commission was familiar with the audio and visual features proposed for Tai Sai, having considered the same features for SkyCity's Roulette and Baccarat tables in decision GC06/23. In that decision, the Commission was satisfied that the deployment of the proposed electronic audio/visual features would not increase opportunities for casino gambling. The Commission was also satisfied that the deployment of the proposed features raised no other issues of regulatory concern. The Commission reached the same conclusions for the audio/visual features now proposed for Tai Sai; the electronic features will not increase the speed of the game and will enhance game integrity and limit opportunities for crime and dishonesty, which is an express purpose of the Act (section 3(f)).

Non-use of pucks

9. The game of Baccarat can be played with four different dealing styles; A, B, C and D. Dealing styles A and C do not permit patrons to handle the cards, while dealing styles B and D do.
10. Pursuant to the previous game rules, the dealer was required to place a Player puck in front of the appropriate patron betting on Player, and a Banker puck in front of the appropriate patron betting on Banker, when dealing styles B and D were deployed. Following the amendment to game rules, SkyCity wants to remove the requirement to place the Player and Banker pucks in this manner. The proposal will not prevent the appropriate patrons from handling the cards, rather it is limited to SkyCity not placing the pucks.
11. SkyCity submitted a video of Baccarat being played with and without the placement of indicator pucks, and the Executive Director provided a report to the Commission on this issue. The Commission was satisfied that removing the requirement for the dealer to place indicator pucks will have no impact on the overall speed of Baccarat and will not increase opportunities for casino gambling. The Commission made this decision on a commonsense basis, in the round.
12. The Commission was also satisfied that removing the pucks would not have implications for game integrity, such as causing patron confusion in relation to who should handle the cards when dealing styles B or D are deployed, or by removing a mechanism which could assist the surveillance cameras with any disputes.

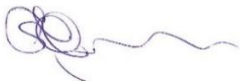
13. The Commission noted that the Secretary was satisfied that removal of the pucks would not increase the speed of the game and would not negatively impact game integrity.

Decision

14. The Commission approved SCML's application, pursuant to condition 10 of its operator's licences:
- not to use indicator pucks on its Baccarat tables when dealing styles B and D are deployed at the Auckland, Hamilton and Queenstown casinos; and
 - to add audio and visual features to the Tai Sai tables in the manner proposed at the Auckland and Hamilton casinos.

Right of appeal

15. Pursuant to section 235 of the Act, a person affected by this decision may appeal that decision to the High Court. An appeal must be made within 15 working days of the date of notice of the Commission's decision, or any longer period that the High Court may allow.



Susan Hughes KC
Gambling Commissioner

for and on behalf of the
Gambling Commission

17 July 2026

