

**IN THE MATTER** of the Gambling Act 2003

**AND** of an application by **SKYCITY CASINO MANAGEMENT LIMITED** for approval of a new game mix Annex for the Queenstown casino

**BEFORE THE GAMBLING COMMISSION**

Members: Lisa Hansen (Chief Gambling Commissioner)  
S C L Pearson  
S Hughes QC  
W A Acton  
S T Shaw

Date of Application: 27 May 2022

Date of Decision: 8 July 2022

Date of Notification  
of Decision: 11 July 2022

**DECISION ON AN  
APPLICATION BY SKYCITY CASINO MANAGEMENT LIMITED  
FOR APPROVAL OF A NEW GAME MIX ANNEX FOR THE QUEENSTOWN CASINO**

**Application**

1. SKYCITY Casino Management Limited ("**SCML**") applied to the Commission for approval of a new game mix Annex, under condition 9 of its operator's licence for the Queenstown casino.

**Licence condition**

2. The relevant licence condition is as follows:

**SCML's operator's licence (Queenstown)**

9. The Licence Holder may operate on casino gaming tables the game types and game mixes specified in Annex A attached to this Licence. The Licence Holder shall obtain the prior approval of the Commission for any change to the game types and/or game mixes specified.

**Submissions by SCML**

3. SCML submitted, in summary, as follows:
  - (a) It wants to add one new game mix to its Annex, game mix J2, which will be deployed on the MGF, if approved. Game mix J2 is similar to an existing approved game mix, I2, with the only difference being that game mix J2 replaces

a Blackjack game with a Midi Baccarat game. Proposed game mix J2 is as follows:

	<b>J2</b>
Midi Baccarat	2
Black Jack (automatic shuffler)	2
Roulette	1
Electronic Roulette/Tai Sai/Baccarat	2
Electronic Roulette/Tai Sai/ Baccarat with manual wagers on Roulette layout	1

- (b) Proposed game mix J2 will have no adverse impact on casino gambling opportunities, having fewer player spaces and gambling opportunities than other game mixes which have already been approved for the MGF, as follows:

<b>Game mix</b>	<b>Opportunities</b>	<b>Player spaces</b>
A2	4,226	149
B2	5,328	166
C2	3,123	132
D2	5,790	166
E2	5,829	172
F2	5,559	166
G2	5,880	168
H2	4,107	133
I2	4,737	147
J2	5,238	153

- (c) Further, by combining the game mix with the most player spaces and casino gambling opportunities for the MGF with the game mix with the most player spaces and casino gambling opportunities for the Horizon Room, the resulting combination has fewer player spaces and gambling opportunities than the regulatory benchmark game mix for the Queenstown Casino, game mix A. It is satisfied that the new game mix will not increase opportunities for casino gambling.

#### **Submissions by the Secretary**

4. The Secretary had no regulatory concerns with SCML's proposal.

#### **Analysis**

5. SCML is permitted to operate location specific game mixes at the Queenstown casino, as well as a number of game mixes which are not location specific. It has four existing game mixes which are not location specific, A-D. Game mix A is the casino's benchmark game mix, while game mixes B-D are operational game mixes. Game mix A is as follows:

	A
Midi Baccarat (9 Box, Style A)	3
Black Jack (manual shuffle)	3
Black Jack (automatic shuffler)	2
Roulette	3
Caribbean Stud Poker	1

6. SCML has approval to operate location specific game mixes in two areas at the Queenstown casino; the MGF and the Horizon Room. SCML has approval to operate game mixes A1-H1 in the casino's Horizon Room, as follows:

	A1	B1	C1	D1	E1	F1	G1	H1
Midi Baccarat (7 Box, Style B)	2	2	3	3	4	1	0	1
Black Jack (auto shuffler)	1	0	0	1	0	1	0	2
Roulette	1	2	1	0	0	2	0	1
Poker	0	0	0	0	0	0	4	0

7. On the MGF, SCML has approval to operate nine game mixes, A2-I2, and seeks approval for a tenth game mix, J2. These game mixes are as follows:

	A2	B2	C2	D2	E2	F2	G2	H2	I2	J2
Midi Baccarat	1	2	0	4	3	2	4	1	1	2
Mini Baccarat	0	0	0	0	0	1	0	0	0	0
Black Jack (auto shuffler)	3	3	3	1	2	2	2	2	3	2
Roulette	2	2	2	2	2	2	2	1	1	1
Caribbean Stud Poker	1	1	1	1	1	1	0	1	0	0
Poker	1	0	2	0	0	0	0	0	0	0
Electronic Roulette/Tai Sai/Baccarat	0	0	0	0	0	0	0	2	2	2
Electronic Roulette/Tai Sai/Baccarat with manual wagers on Roulette layout	0	0	0	0	0	0	0	1	1	1

8. The Commission considered the game mixes for the MGF and the game mixes for the Horizon Room, and compared them with game mix A. The Commission was satisfied, in the round, that no combination of game mixes from the MGF (including proposed game mix J2) and the Horizon Room would generate more opportunities for casino gambling than game mix A. The Commission made this assessment on a common sense basis, in the round, rather than by calculating opportunities based upon tables of data or upon a formula.

### Decision

9. The Commission approved the new game mix Annex, under condition 9 of SCML's operator's licence for the Queenstown casino. The new Annex is **attached**.

**Right of appeal**

10. 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.



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**Lisa Hansen**  
Chief Gambling Commissioner

for and on behalf of the  
Gambling Commission

11 July 2022



## ANNEX A

Pursuant to condition 9 the following game mixes may be operated by the Licence Holder on casino gaming tables subject to the following conditions and requirements:

### Game Mix A

Black Jack – up to 5 games  
Roulette – up to 3 games  
Midi Baccarat – up to 3 games  
Caribbean Stud Poker – up to 1 game

### Game Mix B

Black Jack – up to 2 games  
Roulette – up to 2 games  
Midi Baccarat – up to 1 game  
Caribbean Stud Poker – up to 1 game  
Poker – up to 6 games

### Game Mix C

Black Jack – up to 2 games  
Roulette – up to 2 games  
Caribbean Stud Poker – up to 1 game  
Poker – up to 7 games

### Game Mix D

Black Jack – up to 2 games  
Roulette – up to 2 games  
Midi Baccarat – up to 2 games  
Caribbean Stud Poker – up to 1 game  
Poker – up to 5 games

## FURTHER ALTERNATIVE GAME MIXES

Pursuant to condition 9 the following game mixes may be operated by the Licence Holder on casino gaming tables in the locations specified, subject to the following conditions and requirements noted:

**In the area designated as the Horizon Room, any one of the following 4 table game mixes:**

	<b>A1</b>	<b>B1</b>	<b>C1</b>	<b>D1</b>	<b>E1</b>	<b>F1</b>	<b>G1</b>	<b>H1</b>
Midi Baccarat	2	2	3	3	4	1	0	1
Black Jack	1	0	0	1	0	1	0	2
Roulette	1	2	1	0	0	2	0	1
Poker	0	0	0	0	0	0	4	0
<b>Total</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>

together with

In the Gambling Area on the main floor, any one of the following 8 table game mixes:

	<b>A2</b>	<b>B2</b>	<b>C2</b>	<b>D2</b>	<b>E2</b>	<b>F2</b>	<b>G2</b>	<b>H2</b>	<b>I2</b>	<b>J2</b>
Midi Baccarat	1	2	0	4	3	2	4	1	1	2
Black Jack	3	3	3	1	2	2	2	2	3	2
Roulette	2	2	2	2	2	2	2	1	1	1
Caribbean Stud Poker	1	1	1	1	1	1	0	1	0	0
Poker	1	0	2	1	0	0	0	0	0	0
Mini Baccarat	0	0	0	0	0	1	0	0	0	0
Electronic Roulette/Tai Sai/Baccarat	0	0	0	0	0	0	0	2	2	2
Electronic Roulette/Tai Sai/Baccarat with manual wagers on Roulette layout	0	0	0	0	0	0	0	1	1	1
<b>Total</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>8</b>

### Notes

1. The Licence Holder is permitted to operate automatic shufflers on 50% of open Blackjack tables and all Caribbean Stud Poker and Baccarat tables set out in Game Mix A.
2. The Licence Holder is permitted to operate an automatic shuffler on one Caribbean Stud Poker game and on all Baccarat, Poker and Black Jack games set out in all other game mixes.
3. The Licence Holder is permitted to change between the game mixes specified subject to providing the Inspectorate with prior notice.
4. Any flip top tables forming part of a game mix must be operated in accordance with the requirements of the relevant minimum operating standards.
5. All Midi Baccarat games specified in the further alternative game mixes and operating in the Horizon Room shall be conducted in accordance with either dealing style B or (where permitted by the Baccarat rules) dealing style D.
6. All Midi Baccarat games specified in the further alternative game mixes and operating in the Horizon Room shall have no more than 7 boxes.
7. When game mix D2 is deployed in the gambling area on the main floor, at least two of the four Midi Baccarat games shall have no more than 7 boxes.
8. When game mix G2 is deployed in the gambling area on the main floor, the four Midi Baccarat games will be comprised of two games with no more than six boxes and two games with no more than eight boxes.
9. U-Spin devices approved by the Department of Internal Affairs may be used on any Roulette games.
10. When game mixes H2, I2 or J2 are deployed, up to 15 player terminals may be used interchangeably across Electronic Baccarat, Electronic Tai Sai and Electronic Roulette. This means that the terminals may be used on one of the electronic games, or on a combination of the three electronic games. The Roulette table attached to the Electronic Roulette game may also be used to accept manual wagers.