

IN THE MATTER of the Gambling Act 2003

AND on an application by **SKYCITY CASINO MANAGEMENT LIMITED** for approval to deploy electronic enhancements on its gaming tables 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: 11 July 2025

Date of Decision: 8 August 2025

Date of Notification of Decision: 11 August 2025

DECISION ON AN APPLICATION BY SKYCITY CASINO MANAGEMENT LIMITED FOR APPROVAL TO DEPLOY ELECTRONIC ENHANCEMENTS ON ITS GAMING TABLES 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 approval to deploy smart table technology on its baccarat, blackjack and roulette tables at each of its three 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.

- (a) It has previously tested radio frequency identification technology (“**RFID**”) on a table game for the purpose of detecting counterfeit chips. The supplier of its RFID technology, Angel, has developed further technology to offer RFID solutions to enable bet and chip float balance information, detection of possible fraudulent betting activity and dealer errors, bet attribution and game win/loss data. These “smart table” solutions can be used individually or together and, if used, will provide enhanced game integrity and increased accuracy of table game data (for both customers and the casino). Currently most table games data is collected manually and is based on estimation.
- (b) Angel’s smart table solutions have been deployed across the Asia-Pacific region, with over 2000 smart tables operating in Asia (Macau and Singapore) and over 100 in Australia.
- (c) It seeks to utilise the following smart table technology (together with the associated hardware and software): RFID Float, Visual Bet Detection Cameras, Discard Sensor, RFID Bet Detection; Visual Player Detection Cameras, and Dealer Console.
- (d) Initially the technology will be deployed at baccarat tables in Auckland, but in time it could be deployed in Hamilton and/or Queenstown. Accordingly, it seeks approval for its use on baccarat, blackjack and roulette tables at the Auckland, Hamilton and Queenstown casinos.
- (e) The smart table technology has no bearing on game output or casino gambling opportunities.

Secretary’s submission

- 5. The Secretary submitted, in summary, that the technology is intended to enhance game integrity through improved protection measures. The technology will not influence game outcomes or alter the nature of gambling opportunities available to patrons. He has no regulatory concerns with the proposal.

Analysis

- 6. SCML sought Commission approval to deploy RFID technology on the baccarat, blackjack and roulette tables at each of its three casinos. The Commission was satisfied that deploying the proposed RFID technology will not increase opportunities for casino gambling. The proposal raised no other issues of regulatory concern.

Decision

7. Pursuant to condition 10 of SCML's operator's licences for the Auckland, Hamilton, and Queenstown Casinos, the Commission approved SCML's application to deploy the specified RFID technology on the baccarat, blackjack and roulette tables at each of the three SkyCity casinos.

Right of appeal

8. 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

11 August 2025

