

IN THE MATTER of the Gambling Act 2003

AND on an application by **SKYCITY CASINO MANAGEMENT LIMITED** for approval to introduce a new card shoe at the Hamilton, Queenstown and Wharf casinos, and for approval to introduce a new type of card shuffler at the Auckland, Hamilton, Queenstown and Wharf casinos

BEFORE THE GAMBLING COMMISSION

Members: G L Reeves (Chief Gambling Commissioner)
L M Hansen
W N Harvey
S C L Pearson

Date of Application: 10 October 2019

Date of Decision: 6 December 2019

Date of Notification of Decision: 11 December 2019

DECISION ON AN APPLICATION BY SKYCITY CASINO MANAGEMENT LIMITED FOR APPROVAL TO INTRODUCE A NEW CARD SHOE AT THE HAMILTON, QUEENSTOWN AND WHARF CASINOS, AND TO INTRODUCE A NEW TYPE OF CARD SHUFFLER AT THE AUCKLAND, HAMILTON, QUEENSTOWN AND WHARF CASINOS

Introduction

1. SKYCITY Casino Management Limited ("**SCML**") applied to the Commission:
 - (a) under condition 10 of its operator's licences for the Hamilton and Queenstown casinos, and condition 9 of its operator's licence for the Wharf casino, for approval to deploy the "Angel Eye" card shoe on its Baccarat tables at the Hamilton, Queenstown and Wharf casinos; and
 - (b) under condition 10 of its operator's licences for the Auckland, Hamilton and Queenstown casinos, and condition 9 of its operator's licence for the Wharf casino, for approval to deploy a "Safe-Bacc" card shuffler on its Baccarat and Electronic Baccarat tables at its Auckland, Hamilton, Queenstown and Wharf casinos.

Licence conditions

2. The relevant licence conditions are as follows:

SCML's operator's licence (Auckland, Hamilton and Queenstown casinos)

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.

SCML's operator's licence (Wharf casino)

9. 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 8 above or electronic aids or enhancements or changes to table game rules which create new wagering opportunities.

SCML's submissions

3. SCML submitted, in summary, as follows:

- (a) It operates a number of automatic shufflers on its Baccarat games, the use of which is provided for in the game mixes applicable to its four casinos. It has also deployed the "Angel Eye" intelligent card shoe following decision GC22/11, where the Commission determined that its deployment would not increase casino gambling opportunities as it does not increase the speed with which cards are dealt.
- (b) In preparing this application, it noted that the approval provided by decision GC22/11 was limited to the Auckland casino only. It was not its intention to do this and it now seeks an approval of the type set out in decision GC22/11, to allow it to deploy Angel Eye at its Hamilton, Queenstown and Wharf casinos.
- (c) A "Safe-Bacc" card shuffler, card shoe and associated software were recently approved by the Secretary for deployment in New Zealand casinos. Approval is now sought from the Commission to deploy this equipment on the Baccarat and Electronic Baccarat tables at each of its four casinos.
- (d) The Safe-Bacc verifies, shuffles, and automatically loads cards into the detachable i-shoe, which effectively removes the opportunity for the dealer to manually cut the cards. Pursuant to game rules, cutting cards is optional and at the discretion of the casino operator, and manual interventions of this type create risks and vulnerabilities. Having the cards automatically loaded into the i-shoe removes dealer intervention and enhances security.

- (e) The new equipment is, in effect, a combination of an automatic shuffler and an intelligent card shoe, both of which are currently in operation. The equipment will not increase opportunities for casino gambling.

The Secretary's submissions

4. The Secretary had no regulatory concerns with SCML's proposal and submitted that it would not increase opportunities for casino gambling.

Analysis

5. Licence condition 10 was attached to SCML's operator's licence to allow the Commission to consider whether the introduction of an electronic aid or enhancement could increase opportunities for casino gambling. An increase in opportunities is prohibited by section 11 of the Act.
6. Angel Eye will not increase opportunities as it does not increase the speed with which cards are dealt – it simply improves the integrity of Baccarat games by preventing participants illegally introducing cards onto the table, or by notifying the dealer if too many cards have been dealt. The introduction of Angel Eye into the Hamilton, Queenstown and Wharf casinos raises no other issues of regulatory concern.
7. Similarly, the deployment of Safe-Bacc will not increase opportunities for casino gambling. Its deployment will improve the integrity of the games, which is consistent with the section 3(e) purpose of the Act.
8. The deployment of Safe-Bacc raises no other issues of regulatory concern for the Commission.

Decision

9. The Commission approved:
- (a) under condition 10 of SCML's operator's licences for the Hamilton and Queenstown casinos, and condition 9 of its operator's licence for the Wharf casino, the introduction of the Angel Eye card shoe on to the Baccarat tables at the Hamilton, Queenstown and Wharf casinos; and
- (b) under condition 10 of SCML's operator's licences for the Auckland, Hamilton and Queenstown casinos and condition 9 of its operator's licence for the Wharf casino, the introduction of Safe-Bacc to the Baccarat and Electronic Baccarat tables at the Auckland, Hamilton, Queenstown and Wharf casinos.

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.



Graeme Reeves
Chief Gambling Commissioner

for and on behalf of the
Gambling Commission

11 December 2019

