



**Queensland
Government**

Guidelines

Transfer of Gaming Machine Entitlements between Clubs

Gaming Machine Act 1991 Part 3B

October 2009

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Part 1 Overview

1.1 Introduction

On 17 April 2008, Premier Anna Bligh announced “*a sweeping overhaul of liquor and gambling in Queensland*”. Amongst the harm minimisation initiatives announced by the Premier was a two-year moratorium on the release of gaming machines to clubs and hotels in Queensland.

In November 2008, the Premier joined Treasurer Andrew Fraser in announcing that the moratorium would be permanent.

These announcements capped the number of gaming machines that may be operated in Queensland clubs at 24,705, being the number approved for all clubs at 15 April 2008 plus allowance for applications made prior to 15 April 2008 that were as yet undecided.

The Premier’s first announcement included advice that “*to complement the new cap on club machine numbers, a reallocation scheme will be introduced after close consultation with industry. The scheme will allow for some movement of existing machines between sites.*”

Accordingly, the Office of Liquor and Gaming Regulation, in consultation with peak bodies in the club industry, has developed a reallocation scheme for gaming machines within the cap.

Under the scheme, the reallocation of gaming machines amongst Queensland clubs will be managed via the creation of gaming machine entitlements.

Entitlements are an intangible commodity that will be transferable between clubs on either a permanent (sale) or temporary (lease) basis.

The ability to temporarily transfer (lease) entitlements **to** another club is limited to small clubs with approval for less than 30 gaming machines. This represents approximately 63% of the total clubs in Queensland. All clubs may temporarily transfer entitlements **from** another club.

It is anticipated that the scheme will commence on 1 November 2009.

1.2 Purpose

These guidelines are issued under sections 54A of the *Gaming Machine Act 1991* to inform persons about;

- The attitudes the Chief Executive is likely to adopt on matters relating to the transfer of club gaming machine entitlements; and

- How the Chief Executive will administer the act with regard to the transfer of club gaming machine entitlements and the approval of pre-requisite reductions for the permanent transfer of entitlements.

These guidelines do not address the authorised sale process, by tender auction, that applies to entitlements of the State. This process is addressed in *Guidelines to the Authorised Sale of Gaming Machine Entitlements for Clubs*.

1.3 Terms

The following definitions apply to terms used in this guideline:

The Act	Refers to the <i>Gaming Machine Act 1991</i>
Approved gaming machines	The number fixed by the Queensland Gaming Commission as the maximum number of gaming machines that the club may operate.
Category 2 Licensee	Refers to a club licensee
Chief executive	refers to a delegate of the chief executive (Executive Director, Office of Liquor and Gaming Regulation, and other OLGR Officers).
Commission	Refers to the Queensland Gaming Commission
Entitlement	Refers to an authorisation for a club, subject to the Act, to install and operate a gaming machine on licensed premises.
Entitlement Region	Means a region of the State as prescribed under the Regulation.
Licensee's entitlements	Refers to the entitlements endorsed on the club's licence, including those that the club has transferred to another club on a temporary basis. Does not include another club's entitlements that the other club allows the club to use on a temporary basis.
Permanent transfer	Refers to the permanent transfer of entitlements from one licensed club to another licensed club. The transferor club has no further interest in the entitlements.
Prerequisite reduction	Refers to a reduction of the approved number of gaming machines at a transferor's licensed premises in order to make entitlements available for permanent transfer.
Prerequisite application	For a permanent transferor, refers to an application to decrease the approved number of gaming machines for the premises. For a transferee (permanent or temporary) means an application for a licence, or an application to have an additional premises added to the licence, or an application to increase the approved number of gaming machines.
Prerequisite notification	For a permanent transfer, refers to a notification of the surrender of the gaming machine licence, or a notification of cessation at additional premises.
The Regulation	Refers to the <i>Gaming Machine Regulation 2002</i>
Temporary transfer	Refers to an arrangement under which the entitlements of one club are used, on a temporary basis, by another club.
Transferee	The receiver of entitlements in the transfer. A club that accepts entitlements from another club under a transfer agreement.
Transferor	The supplier or vendor of entitlements in a transfer. A club that provides entitlements to another club.

1.4 Gaming machine entitlements

To effect the cap and allow the redistribution of gaming machine entitlements between clubs, the Act provides for the existence of gaming machine entitlements.

An entitlement is an authorisation for a club licensee to install and operate a gaming machine on the licensee's premises.

The club must hold one entitlement for each gaming machine it wishes to operate.

To ensure that the number of gaming machines operating in Queensland clubs does not exceed the cap number, only 24,705 entitlements will be created.

Under the reallocation scheme, clubs will be free to transfer entitlements directly to other clubs in the same entitlement region, without the need for participation in an authorised sale overseen by the Government.

A Government sale process, by tender auction, will only apply to Government-owned entitlements acquired, for example, when a licence is cancelled.

1.5 An initial allocation of entitlements

At the commencement of the scheme, clubs will receive an initial allocation of entitlements in accordance with the Act.

On the date of commencement, existing licensed clubs will be given one entitlement for each of the approved gaming machines that the commission has approved the club to operate.

The following exceptions and additions apply under the Act assuming a commencement date of 1 November 2009:

- If the club applied for an increase or a licence **after** 15 April 2008, and the application was approved **before** 1 November 2009, the club will **not** receive entitlements for the number of additional gaming machines that were approved in the application; and
- If the club applied for an increase or a licence **before** 15 April 2008, and the application is approved **after** 1 November 2009, that club will receive additional entitlements equivalent to the number approved in the application.

No action is required from clubs with regard to the initial allocation.

On the date of commencement, OLGR will forward each licensed club a fresh licence reflecting the number of entitlements allocated to the club.

If a club wishes to obtain additional entitlements after the initial allocation, it must do so subject to the reallocation scheme. This requirement applies to all applications for licences or additional gaming machines made after 15 April 2008.

Entitlements allocated in the initial allocation cannot be transferred if the club has not yet operated its approved number of gaming machines for the premises. This is explained in 1.8.1 below.

1.6 How clubs obtain entitlements after the initial allocation

Despite the reallocation scheme, the commission still sets the maximum number of gaming machines that an individual club may operate. Clubs may not obtain a number of entitlements that exceeds the number of approved gaming machines fixed for the premises by the commission¹. It follows that:

- Existing clubs who wish to acquire more entitlements in order to operate additional gaming machines must apply to the commission for an increase in the approved number of gaming machines.
- Clubs that do not hold a gaming machine licence must obtain a licence before they are eligible to acquire entitlements. If the commission grants the licence, the commission will fix an approved number of gaming machines for the premises (with regard to the number of gaming machines that the applicant has requested in the application).

Once the approved number of gaming machines for the premises exceeds the number of entitlements that the licensee already has², the club can obtain entitlements by either:

- negotiating a transfer of entitlements from another club in the same entitlement region; or
- obtaining the entitlements from an authorised sale conducted by the Government.

This guideline addresses the transfer of entitlements between two clubs. The authorised sale process for Government entitlements is addressed in *Guidelines – Authorised Sale of Gaming Machine Entitlements for Clubs*.

1.7 Transfer of entitlements between clubs

Under the reallocation scheme provided for in the Act, clubs are free to approach other clubs in the same entitlement region and negotiate a transfer of entitlements.

The transfer is a contractual and commercial matter between the two clubs. The Government will have minimal involvement in the process, however transfers must be approved by the commission in order to manage the cap.

The parties to a transfer are referred to as follows:

- The transferor is the club that is the vendor or supplier of the entitlements in the transfer.

¹ Clubs that require the approval of a licence or increase application prior to obtaining entitlements are advised to see the commission's *Guidelines – Applicants for Gaming Machine (Site) Licences and Increases* and the chief executive's *Brief to Applicants*.

² Or uses – see 1.9 *Maximum entitlements that a transferee may obtain* for further information.

- The transferee is the club that receives the entitlements under the transfer.

Only a club that is the holder of a gaming machine licence may be a transferee. Transferors must hold, or have held, a gaming machine licence. Additionally, both parties must meet the eligibility criteria for the type of transfer that the parties wish to transact. These criteria are set by the Act and addressed later in this guideline³.

Eligible parties may agree to a permanent transfer of entitlements or a temporary transfer of entitlements.

In a **permanent transfer of entitlements** (addressed in detail in Part 2) –

- the entitlements are provided to the transferee (receiver) on a permanent basis in exchange for a one-off flat fee, after which the transferor (supplier) has no ongoing interest in the entitlements⁴.

In a **temporary transfer of entitlements** (addressed in detail in Part 3) –

- An eligible transferor (supplier) relinquishes the ability to operate a gaming machine on the entitlements, and this ability passes to the transferee for a set term. In exchange for the privilege, the transferee (receiver) pays a fee to the transferor at a frequency agreed to by both parties⁵. At the end of the transfer, the ability to operate a gaming machine on the entitlements returns to the transferor.

Once two clubs negotiate the type of transfer, and the price, timing and other conditions of the transfer, the transferor club must lodge an application to OLGR for the transfer of entitlements to the transferee.

If the commission approves the application, the transfer takes place at a date nominated in the transfer application.

The Queensland Government has no role in the process of matching a transferee to a transferor and will not identify eligible parties.

1.8 How entitlements become available for transfer

Entitlements become available for transfer at the discretion of the licensee. There are important distinctions between how entitlements become available for permanent transfer and temporary transfer.

³ To potential parties to a transfer, transfer eligibility checklists are provided at Appendix 1 and Appendix 2.

⁴ Section 109ZF of the Act provides that an encumbrance over an entitlement is of no effect.

⁵ The fee must be a flat fee and may not represent a portion of the turnover or metered win of any gaming machines operated on the entitlements.

1.8.1 Permanent Transfer

In the case of a **permanent transfer**, entitlements become available for transfer when the licensee acts on a business decision to permanently reduce the approved number of gaming machines for the premises by:

- Decreasing the approved number of gaming machines at the premises via application to the chief executive;
- Notifying the chief executive of the surrender of the gaming machine licence;
- Notifying the chief executive of the cessation of an additional premises on the club's licence.

These reductions in the approved number of gaming machines are referred to as pre-requisite reductions for the purpose of these guidelines.

Once the pre-requisite reduction takes effect, the licensee must permanently transfer the relevant number of entitlements to an eligible club in the same entitlement region **within 12 months**, or the entitlements become entitlements of the State.

Please note: A transitional provision of the Act prevents entitlements received in the initial allocation from being permanently transferred if the club has never operated its approved number of gaming machines. This transitional provision is contained in section 452 of the Act.

Most clubs will not be affected by section 452. Clubs that are affected by section 452 will be specifically advised of these requirements by mail at the initial allocation and on a preceding letter advising that Parliament has approved the scheme.

A club will be affected by section 452 if:

- It was approved an increase in the approved number of gaming machines since 31 October 2007, or a licence since 31 October 2006; and in addition to this:
- It has not yet installed the number of gaming machines for which it was granted entitlements at the commencement of the scheme.

Clubs affected by section 452 will be unable to permanently transfer entitlements until the club installs the approved number of gaming machines fixed on its licence.

If the approved number of gaming machines is not installed or operated within the timeframe defined by the increase or licence approval, the approval lapses (in whole or in part) and any surplus entitlements become entitlements of the State. Any entitlements that are still held by the club may then be permanently transferred subject to a further prerequisite reduction.

1.8.2 Temporary Transfer

The option to temporarily transfer entitlements is limited to smaller clubs that have less than 30 approved gaming machines. These clubs must maintain their approved number of gaming machines in order to retain title of the entitlements that have been temporarily transferred, and to allow for the return of the entitlements at the cessation of the temporary transfer.

Accordingly, **there is no prerequisite reduction for a temporary transfer of entitlements.**

The Act requires that a club that is a temporary transferor may only be party to one temporary transfer – that is, it cannot temporarily transfer entitlements to more than one other club, and it cannot be a temporary transferee. Allowable transfers are shown on figure 7 in Part 3 below. Other criteria apply, and these are also described in Part 3.

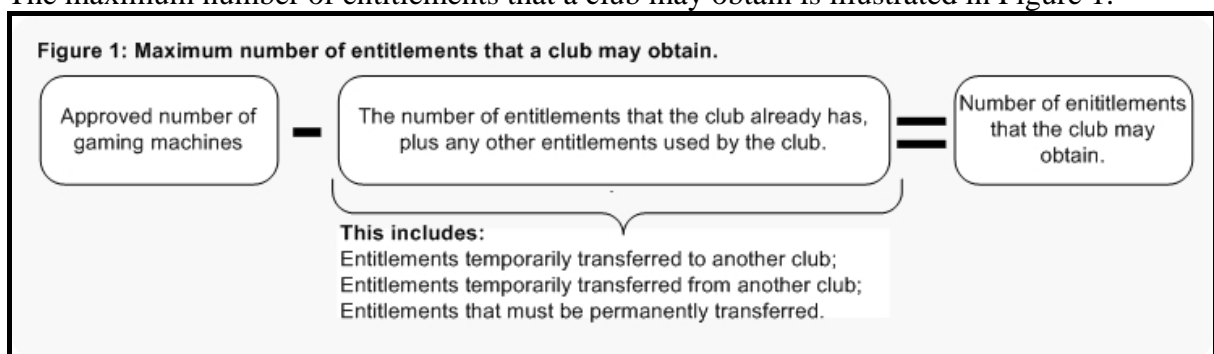
1.9 Maximum entitlements that a transferee may obtain

A club may not obtain, either permanently or temporarily, more entitlements than it has approved gaming machines.

To be eligible to obtain entitlements, on either a temporary or permanent basis, a club must have a greater number of approved gaming machines than:

- If the club is not party to a temporary transfer, its total number of entitlements; or
- If the club uses entitlements transferred from other clubs - the sum of the club's own entitlements and the entitlements temporarily transferred from the other clubs; or
- If the club has temporarily transferred entitlements to another club – the total number of entitlements that the club owns, including those transferred to the other club.

The maximum number of entitlements that a club may obtain is illustrated in Figure 1:



If the club wishes to obtain more entitlements than allowable under figure 1, it must first satisfy licensing requirements as described under 1.6 above. This requirement must be satisfied before a transfer application will be considered. If a transferee named in a transfer application does not have sufficient approved gaming machines on the lodgement of the transfer application, the commission must refuse the transfer on the basis that the transferee does not meet the requirements of sections 109P(2) or 109W(2) of the Act.

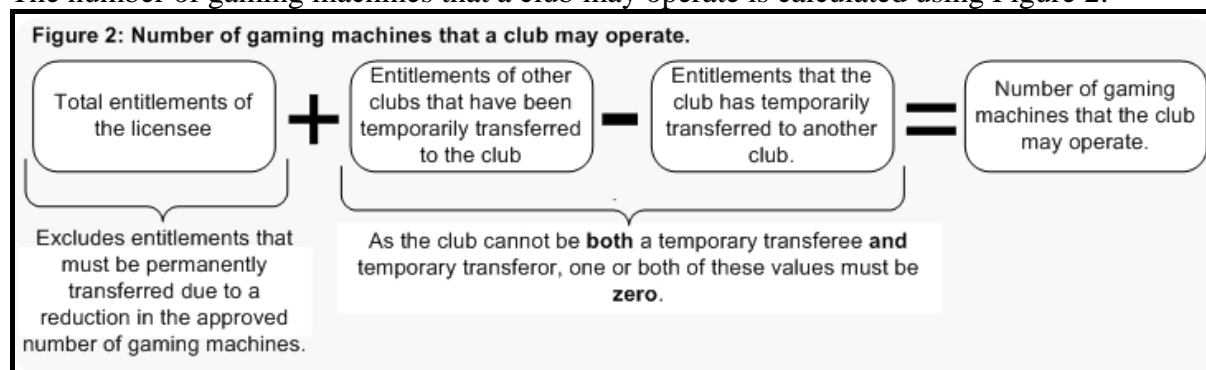
1.10 Entitlement regions

Entitlements may only be traded amongst clubs in the same entitlement region. The entitlement region for each club will be displayed on the club's licence ⁶.

There are three entitlement regions in the State – South East, Western and Coastal. Entitlement region boundaries are shown in the maps at Appendix 4 of this guideline.

1.11 Number of gaming machines that a club may operate

The number of gaming machines that a club may operate is calculated using Figure 2:



Sections 1.6 and 1.9 of this guideline have identified that the number of entitlements used by the club (including those transferred to or from other clubs) may not exceed the approved number of gaming machines fixed for the premises by the commission.

1.12 When entitlements become entitlements of the State

Entitlements of the State may be obtained from the Government via an authorised sale process addressed under separate guideline. The authorised sale will be conducted by tender auction overseen by the Public Trustee of Queensland.

Entitlements become the entitlements of the State when:

- they are endorsed on a gaming machine licence that expires or is not renewed;
- they are endorsed on a gaming machine licence that is cancelled (unless the cancellation occurs due to a transfer of the liquor licence and a new gaming machine licence is issued in respect of the premises);
- the endorsed number of gaming machines for a premises is reduced due the lapsing of a licence or increase approval, and as a result of the lapsing the premises has more entitlements than approved gaming machines;
- entitlements that must be permanently transferred following a prerequisite reduction are not transferred within 12 months.

“Endorsed” does not refer to entitlements that are temporarily transferred to the affected licence by another club. Transferors cannot lose entitlements to the State through action affecting a transferee's licence.

⁶ If the licence, or a replacement licence, was issued after the commencement date (1 November 2009).

However, if the entitlements used in a temporary transfer become entitlements of the State due to an action of the transferor, the transfer ends. This situation is addressed in Part 3.14 of this Guideline.

Part 2 Permanent transfer of entitlements

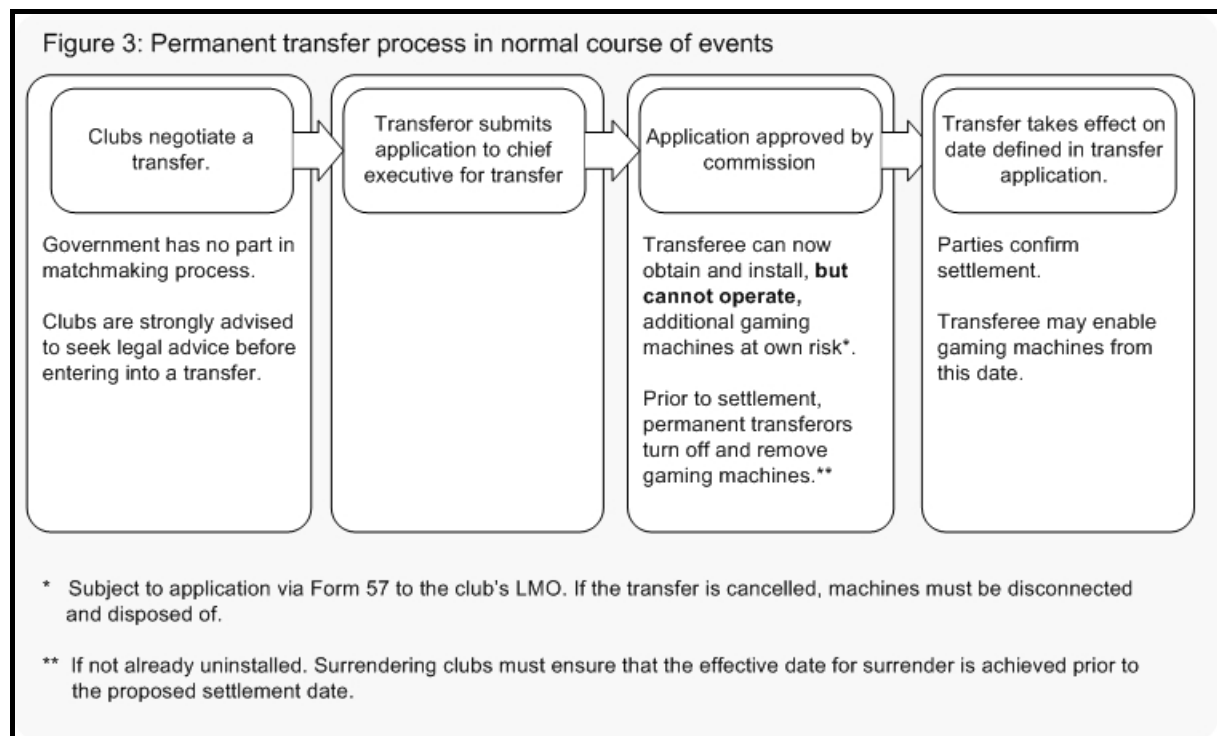
2.1 Overview

The chief executive considers that entitlements transferred on a permanent basis change hands from one club to another. Once the transfer has occurred, the transferor (supplier) has no further interest in the entitlements. The Act provides that an encumbrance over an entitlement is of no effect.

To be eligible for permanent transfer, the transferor (supplier) must first permanently reduce its approved number of gaming machines to a number below its total number of entitlements. Any surplus entitlements must be transferred within 12 months.

In certain situations, the chief executive will process a prerequisite reduction in conjunction with the commission's consideration of the transfer of entitlements. This is explained in 2.2 below.

The general process by which the chief executive will administer the Act with regard to permanent transfers is illustrated in Figure 3 below:



2.2 Approval of transfer in conjunction with prerequisite reduction

Prerequisite reductions by permanent transferors must take effect before entitlements are eligible to be transferred and the chief executive and commission have no discretion in this matter.

However, OLGR expects that clubs will naturally seek some level of comfort regarding a proposed transfer before lodging an application that will permanently reduce gaming activities at the transferor's premises.

To address this concern, the chief executive and commission will consider a prerequisite reduction and a permanent transfer application at the same time.

To utilise this approach, clubs must ensure that:

- The transfer application is accompanied by a duly completed and signed application to decrease the approved number of gaming machines, or notification of surrender, or notification of cessation at an additional premises; and
- The transferor requests on both documents that the chief executive and commission validate the transfer and the prerequisite reduction at the same time⁷; and
- The date that the transfer will take effect is at least six weeks from the day that the chief executive receives the applications/notifications.

When these requests are made, the chief executive will:

- If the commission is willing to approve the transfer – process the prerequisite reduction at the same time that the commission approves the transfer; or
- If the commission is not able to approve the transfer – advise the transferor that the transfer cannot be approved, and seek advice from the transferor as to whether the chief executive should continue to process the decrease, surrender or cessation that accompanied the transfer.

If the transfer is approved but does not occur (for example, because one party renegs), the prerequisite reduction cannot be reversed and the transferor club must find another transferee within 12 months of the reduction taking effect.

2.3 Prerequisite Reductions for Permanent Transferors

As discussed above, clubs wishing to permanently transfer entitlements must first reduce the approved number of gaming machines for the premises to a number that is below the number of entitlements held by the club. This is achieved by:

⁷ The permanent transfer application form and the form pertaining to the prerequisite reduction will make allowance for this.

- **Decreasing the approved number of gaming machines for the premises** under section 86 of the Act. Where the application to decrease is approved by the chief executive, and the number of entitlements held by the licensee exceeds the new number of approved gaming machines after the decrease, the surplus entitlements must be permanently transferred to another club within 12 months.

Decrease applicants are subject to eligibility criteria addressed under Part 2.3.1.

- **Ceasing gaming at an additional premises on the club's licence** under section 91 of the Act. If the club has an additional premises endorsed on its licence, entitlements become available at the cessation of gaming at that premises. The licensee must notify the chief executive of the cessation, which will result in the removal of the premises from the gaming machine licence. Any entitlements associated with the premises must be permanently transferred to another of the licensee's premises, or to another club, within twelve months of the date on which the notification was received by the chief executive.
- **Surrendering the gaming machine licence** in accordance with section 95 of the Act, in which case all entitlements for the licensed premises under the licence must be permanently transferred to another club within twelve months.

Once the surrender, cessation or decrease takes effect, the reduction is irreversible and surplus entitlements must be transferred to another club (or another of the club's premises, if it has additional premises) within twelve months. Surplus entitlements that are not transferred in twelve months become entitlements of the State.

The following sections outline how the chief executive will administer the Act, and the attitude of the chief executive to certain matters, with regard to the prerequisite reduction in approved gaming machines by permanent transferors.

2.3.1 Decrease application

Under a decrease application, the club seeks to have the approved number of gaming machines for its premises (or one of its premises) permanently reduced.

Eligibility to apply for decrease

Any club that is not a party to a temporary transfer may apply to decrease the approved number of gaming machines at the premises.

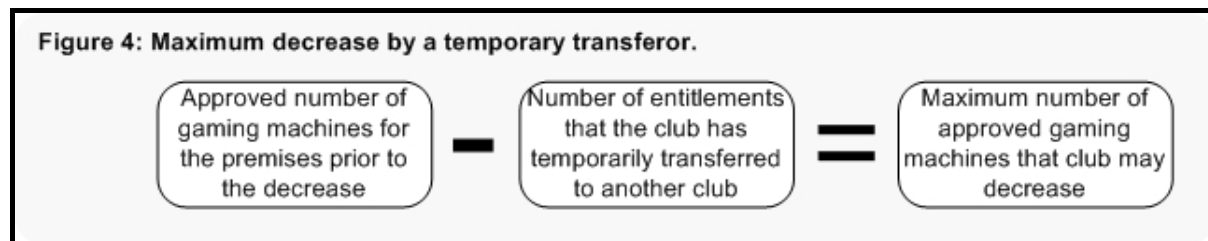
If the club is a party to a temporary transfer, and wishes to decrease in order to permanently transfer some of the club's entitlements, the following restrictions apply under the Act:-

- If a club is a temporary transferee (ie if the club is using entitlements that belong to another club), the club cannot apply for a decrease ⁸.
- If the club is a temporary transferor (ie if another club uses some of the club's entitlements), the club is limited in the number of gaming machines it can decrease. The

⁸ Act s86 (1A)

club may not decrease to the extent that the temporary transfer would be affected⁹. The decrease cannot require that entitlements used in a temporary transfer be permanently transferred.

The formula to calculate the maximum number of gaming machines that may be decreased by a temporary transferor is calculated using Figure 4 below:



An example describing the limitations on a club's eligibility to decrease its approved number of gaming machines:

Club A (transferor) is approved to operate 12 gaming machines and has twelve entitlements. It uses 7 entitlements to operate gaming machines at its own premises and allows Club B (transferee) to use the remaining 5 under a temporary transfer approved by the commission.

In this scenario Club B (the transferee) cannot apply for a decrease at all. The maximum decrease allowed Club A is 7 ($12 - 5 = 7$), to a new total of 5 approved gaming machines. Any number decreased, to this maximum of seven, must be subtracted from the number of machines that Club A can operate. If Club A elects to decrease all 7, it may operate 0 machines but must remain a licensee to continue the temporary transfer to Club B.

When the decrease takes effect

The decrease takes effect when it is approved by the chief executive.

On the day that the decrease is approved, OLGR will instruct the club's licensed monitoring operator (LMO) to disable the relevant number of gaming machines at the close of business.

The relevant number of gaming machines is the number required to reduce the club's operational gaming machines to the number it may operate under Figure 1 in part 1.11 above.

The LMO will contact the club to discuss which machines should be disabled. The disablement will occur at close of business on the day that the decrease is approved.

2.3.2 Notification of surrender of the gaming machine licence

Club that no longer wish to participate in machine gaming in Queensland may surrender the gaming machine licence.

⁹ Act s86 (1C)

The licensee is required to permanently transfer all of the club's entitlements within one year of the surrender taking effect. Any entitlements not transferred within the twelve month period become entitlements of the State.

Once the licence is surrendered, the club is no longer a gaming machine licensee and has no ongoing role in the reallocation scheme. The club cannot remain a temporary transferor or transferee following the surrender.

Once the surrender takes effect, the club's decision cannot be reversed. If the club wishes to again become a licensee in the future, it must lodge a new licence application, fee, community impact statement and any other requirements of the Act for the consideration of the commission.

Determining the date that the surrender takes effect

Entitlements that become available through the surrender of a licence are not available for transfer until the surrender takes effect. The Act states that the surrender takes effect at the later of two dates – a nominated date or the clearance date. These are explained below (implications follow):

- The **nominated date** is a date optionally nominated by the licensee in the surrender application. If the nominated date is less than three months from the lodgement of the notification, the nominated date must be approved by the chief executive.

If the date nominated is later than three months, the chief executive's approval of the date is not required.

If no date is nominated, or if the chief executive does not approve a nominated date that is less than three months from the date of notification, the nominated date is set by the Act at three months from the lodgement of the notification.

The nominated date has no effect if the clearance date has not occurred.

The **clearance date** is the date that the chief executive becomes satisfied that the licensee has disposed of its gaming machines (**not** entitlements). The clearance date has no effect if the nominated date has not occurred.

Simply put: for an permanent entitlement transfer to occur as the result of a surrender, the surrendering licensee must:

- nominate, for the surrender, a date that occurs before the proposed transfer is to take effect; and
- dispose of its physical gaming machines before the date that it nominated for the surrender.

2.3.3 Cessation of gaming at additional premises

Under section 91A of the Act, clubs that cease gaming at additional premises must immediately advise the chief executive after the fact.

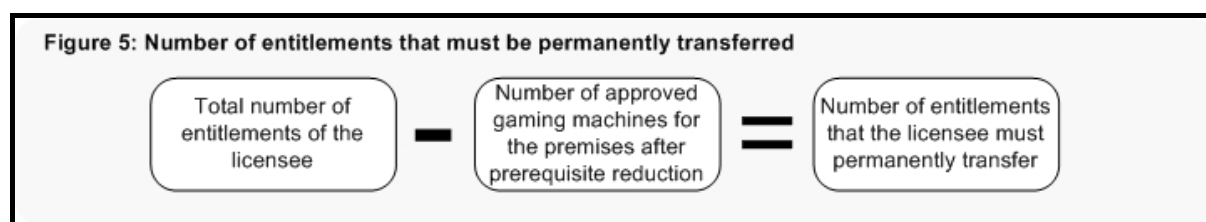
A notice of cessation is not required if the club temporarily ceases to operate gaming machines at the premises. The notification is only required when the club wishes to permanently cease gaming at the additional premises and have the premises removed from its licence.

Entitlements become available for transfer as of the date that the notification of cessation is made. Entitlements must then be transferred within 12 months of that date.

2.4 What happens when the prerequisite reduction takes effect

Once a reduction in the approved number of gaming machines takes effect, the club must permanently transfer the relevant number of entitlements (see figure 5 below) within twelve months.

The relevant number of entitlements that must be transferred after the prerequisite reduction takes effect is the number of entitlements that exceed the approved number of gaming machines after the reduction. This is calculated as using Figure 5 below:



The licensee cannot:

- operate a gaming machine for an entitlement that must be permanently transferred;
- temporarily transfer an entitlement that must be permanently transferred;
- continue to be a temporary transferor of an entitlement that must be permanently transferred.

2.5 Disclosing consideration for a permanent transfer

Section 109N of the Act requires that consideration for a permanent transfer:

- Is monetary; and
- Is between the maximum and minimum amounts prescribed in a regulation; and
- does not provide the transferor (or anyone else, under section 342) with any direct or indirect interest in, or percentage or share of the amount bet for the purpose of gaming, or revenues, profits or earnings from gaming.

At present, no maximum or minimum limits are prescribed in a regulation.

The consideration disclosed on the transfer application form for the permanent transfer must be the amount to be paid by the transferee to the transferor and free of any extraneous costs.

Because the prerequisite reduction is irreversible, transferors are advised to obtain payment in full as part of the settlement for the transfer. As an encumbrance over an entitlement is of no effect¹⁰, it is expected that consideration for a permanent transfer will be a one-time only flat fee.

If the transfer is approved, the amount cannot be changed unless –

- both parties agree to the change and
- an application to vary the transfer is lodged before the date that the transfer takes effect; and
- the application to vary the transfer is approved by the commission.

2.6 Determining the date that a permanent transfer takes effect

An application for the permanent transfer of entitlements is to specify a date upon which the transfer will take effect. On this date, the transferee will be able to commence operating gaming machines on the entitlements that are the subject of the transfer.

When negotiating a transfer, parties are advised to ensure that the date of effect for the prerequisite application or notification occurs before the date that the transfer is to take effect. Transferors who are surrendering the licence must therefore ensure that they have disposed of all gaming machines to the chief executive's satisfaction prior to the proposed transfer date¹¹.

2.7 After approval of the permanent transfer

To ensure that the transfer has taken effect, the chief executive requires a notification of settlement signed in accordance with the constitution of both parties (transferee and transferor).

A blank notification form will be sent to the transferor when the chief executive advises of approval of the transfer. This form must be returned before the chief executive will update the chief executive's database as to the allocation of entitlements.

The completed notification must be returned before the transfer date or the chief executive will be unable to action the transfer.

Once the transfer has taken effect, both licensees (except transferors who have surrendered their licences) must return their licenses to the chief executive within 14 days for replacement.

¹⁰ GMA section 109ZF

¹¹ If the surrender has not taken effect by the transfer date, the entitlements are not eligible for transfer and the transfer may not go ahead.

2.8 If entitlements are not transferred within 12 months

Regardless of the approval of a transfer, if the entitlements are not permanently transferred to a transferee within 12 months of the date that the pre-requisite reduction takes effect, they become entitlements of the State by operation of sections 87(10), 91A(4) or 95(2E) of the Act.

This means that the entitlements revert to the State, and the club loses the ability to transfer the entitlements. There is no provision in the Act for an extension to the twelve-month period.¹²

2.9 Variation of a permanent transfer

If the parties wish to vary the consideration paid for a permanent transfer after the approval of the transfer, the variation must be approved by the commission. An application to vary a transfer must be made by the transferor in writing and must be accompanied by the prescribed fee.

A permanent transfer may only be varied in the period between its approval by the commission and the date that the transfer takes effect.

The commission must approve the variation if the transfer remains approvable under the criteria by which the original transfer was approved.

Part 3 Temporary transfer of entitlements

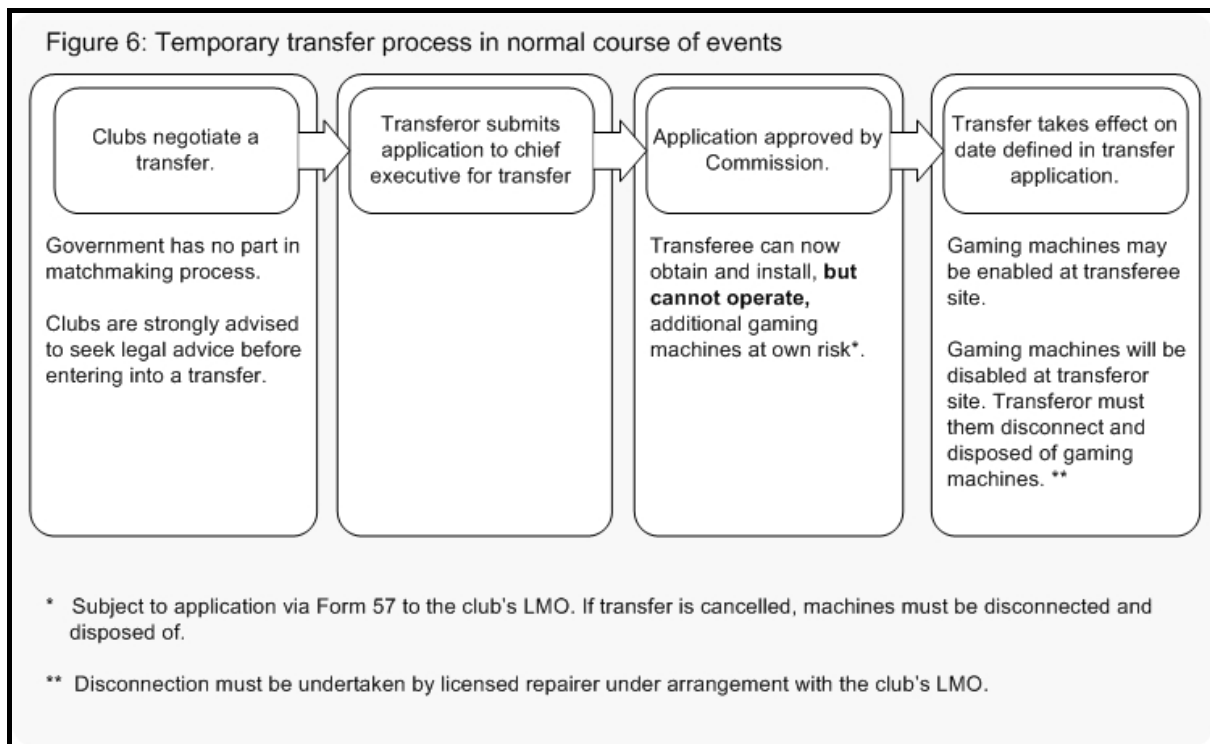
3.1 Overview

Entitlements transferred on a temporary basis remain endorsed on the transferor's licence but are used to operate gaming machines by another club (the transferee club).

The transferee club uses each entitlement to operate a gaming machine and pays the transferor club for the privilege. The term and consideration for the transfer is negotiated between the two parties.

The process that will be observed by the chief executive in executing the Act is illustrated in Figure 6 below:

¹² However, if the club has made a valid application for permanent transfer of the entitlements prior to the expiration of the 12 month period, and the commission has not determined the outcome of the application by the expiration date, the entitlements may be transferred within 14 days of the commission's approval of the application lest they become entitlements of the State.



Eligibility criteria for temporary transfers is addressed below.

3.2 Limit on number of temporary transfers that a club may enter

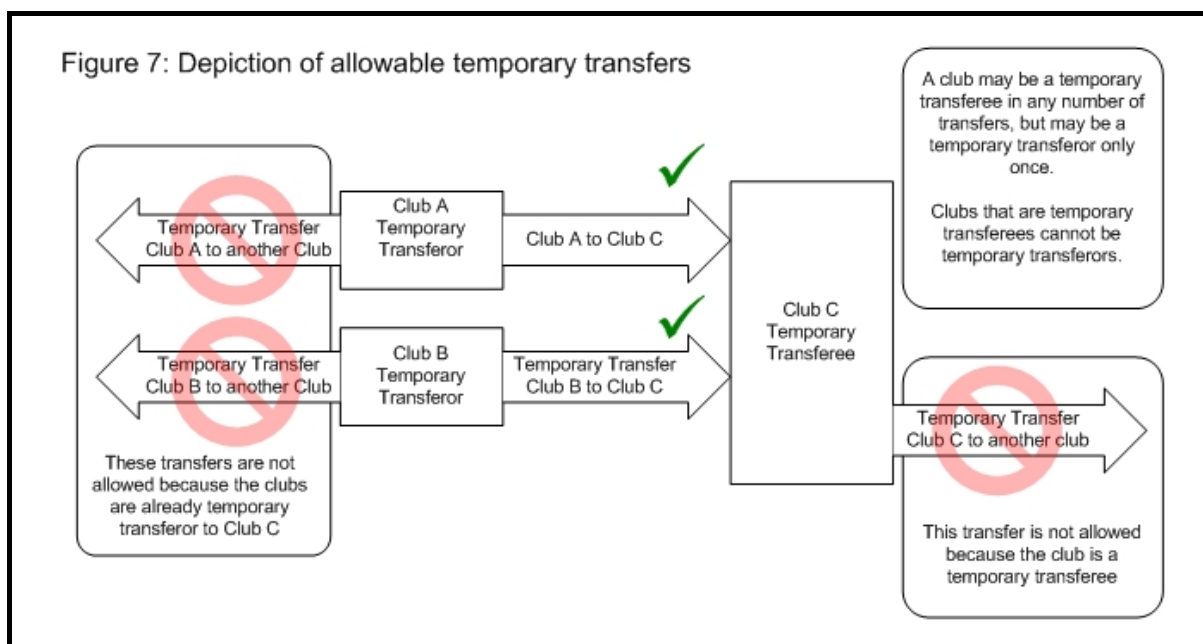
The Act applies the following limitations on temporary transfers:

- A temporary transferor (supplier) may only supply entitlements to one temporary transferee (receiver) under one temporary transfer;
- A temporary transferor (supplier) may not be a temporary transferee (receiver);
- A temporary transferee (receiver) may not be a temporary transferor (supplier).

A temporary transferor (supplier) may therefore be party to only one temporary transfer.

A temporary transferee (receiver) may be a transferee (receiver) under any number of temporary transfers, but may not be a temporary transferor (supplier) at all.

Allowable temporary transfers are depicted in Figure 7 below:



3.3 Eligibility of a temporary transferee

The Act requires that clubs wishing to temporarily obtain additional entitlements, as a temporary transferee under a temporary transfer, must fulfil the following criteria:

- The club must not be a temporary transferor (supplier) - see 3.2 above;
- None of the club's entitlements must be required to be permanently transferred within a twelve month period due to approval of a decrease application or the lodgement of a notification of surrender or cessation;
- The club must be approved for sufficient gaming machines to accommodate the additional entitlements – see 1.9 above.

Provided it meets the criteria above, any licensed club can be a temporary transferee (regardless of the number of gaming machines approved for its licence).

3.4 Eligibility of temporary transferor

To be a temporary transferor, and supply entitlements on a temporary basis to other clubs, a club must meet all of the following criteria defined by the Act:

- The club must not already be a party to an existing temporary transfer (see 3.2 above).
- The club must have a total of less than 30 approved gaming machines;
- The club must **not** have been granted a licence, or approved an increase, due to an application made after 15 April 2008; and

- The club has, at one point before the temporary transfer application was made, installed a number of gaming machines equal to the current approved number of gaming machines for the premises¹³.

Clubs approved a licence or increase application made after 15 April 2008 are not eligible to be temporary transferors until three years after the licence or increase is approved.

3.5 No prerequisite reduction for temporary transferors

Whilst the transfer itself must still be approved by the commission, there is **no prerequisite reduction** for a temporary transferor, and therefore no need to decrease or surrender the licence.

In fact, the Act requires that the transferor must retain its licence and a sufficient number of approved gaming machines for the continuation of the transfer.

If the transferor licence is surrendered, or cancelled due to compliance action, the temporary transfer ends. For further information, see part 3.14.

3.6 Maximum number that a temporary transferor may transfer

There is no prescribed maximum to the number of entitlements that a temporary transferor (supplier) may transfer. Provided that the transferee can accommodate the additional entitlements, a temporary transferor may transfer all of its entitlements, to the effect that the transferor's premises may operate zero gaming machines.

In these instances, the transferor must remain a gaming machine (and liquor) licensee. The club is still subject to all the obligations of the Act, including the requirement that the club:

- retains a gaming nominee;
- displays its gaming machine licence in a prominent location within the club;
- advises the chief executive, via Form 11, of any changes to its board or executive;
- observes all auditing and reporting processes under the Act.

If the club dissolves, or closes its premises (resulting in the cancellation or transfer of its liquor licence, and the subsequent cancellation of its gaming machine licence), the temporary transfer of entitlements is cancelled. For further information, see part 3.14.

Clubs who transfer all their entitlements will remain subject to inspection and must maintain the register of entitlements addressed in Part 3.11 below.

¹³ That is, if the club is approved for 10 gaming machines, it must have installed and operated 10 machines at some point since it was last approved to operate 10 machines by the commission. This is to protect the transferee from the risk that the transferor's approval will lapse under section 80A or 85AA of the Act..

3.7 Disclosing consideration for a temporary transfer

Section 109U of the Act requires that consideration for a temporary transfer:

- Is monetary; and
- Is between the maximum and minimum amounts limits prescribed in a regulation; and
- does not provide the transferor (or anyone else, under section 342) with any direct or indirect interest in, or percentage or share of the amount bet for the purpose of gaming, or revenues, profits or earnings from gaming.

At present, no limits are prescribed in a regulation.

Transferor must disclose the value and frequency of payments required from the transferee. Any automatic increases in the transfer amount agreed to be both parties must be disclosed.

If the transfer provides for a review of the consideration paid by the transferor, and that review is undertaken and results in an amendment to the price paid for the transfer, a variation of the transfer must be requested and approved by the commission. Review dates and criteria need not be disclosed to the commission or the chief executive.

Once approved, consideration for the transfer cannot be changed unless both parties agree to the change and an application to vary the transfer is lodged and approved by the commission.

3.8 Determining the term of a temporary transfer

The Act requires that the term of a temporary transfer is four years, unless varied by an application to vary the temporary transfer.

3.9 Determining the date that a temporary transfer takes effect

Licensees must allow the chief executive and commission time to assess the transfer, and to make arrangements with the transferor's LMO for the disconnection of gaming machines.

For this reason, a minimum of six weeks is requested between lodgement of the transfer application and commencement of the transfer.

3.10 After approval of a temporary transfer

If a temporary transfer is approved:

OLGR will instruct the club's LMO to disable the relevant number of gaming machines as of close of business on the day prior to the date that the transfer takes effect. The LMO will contact the club to discuss which machines should be disabled.

The relevant number of gaming machines is the number required to reduce the club's operational gaming machines to the number it may operate under Figure 2 in part 1.11 above.

The transferor must then arrange for the disconnection and disposal of the gaming machines.

The transferee may arrange for the installation of the gaming machines that will be operated using the transferred entitlements, **but may not enable the machines until the transfer date.**

The parties to the transfer must return their licences to the chief executive within **14 days of the day that the transfer takes effect** to allow for the issue of a replacement licence. If the date of the transfer is changed after the approval of the transfer, an application to vary the transfer will be required in order to make the change (this will be considered a variation of the term).

3.10a Limitation on gaming applications by parties to a transfer

If a temporary transfer is approved by the commission, the Act prevents the transferor from:

- increasing the approved number of gaming machines for the premises. If an application to increase the approved number of gaming machines is received from a temporary transferor, the commission must refuse the application under section 83(3A) of the Act.
- decreasing the approved number of gaming machines for the premises to a number that would render the transferor unable to continue the transfer (see part 2.3.1 for further information).

The transferee is prevented from decreasing the approved number of gaming machines altogether (see part 2.3.1 for further information).

These limitations apply until the transfer is ended.

3.11 Register of transferred entitlements

The Act requires that the parties to a temporary transfer maintain a register of entitlement transfers.

A blank *Register of Entitlements Subject to Temporary Transfer* form can be obtained from OLGR's website at www.olgr.qld.gov.au.

3.12 Variation of the transfer

If the parties wish to vary the term of, or consideration for, the temporary transfer, the variation must be approved by the commission. An application to vary a transfer must be made by the transferor and must be accompanied by the prescribed fee.

The commission must approve the variation if the transfer remains approvable under the criteria by which the original transfer was approved.

3.13 End of the temporary transfer

Temporary transfers will naturally end at the conclusion of the term.

When a temporary transfer is ended, the entitlements return to the transferor.

At the end date of the term, or an earlier date if applicable due to the variation of the transfer or an operation of the Act described in 3.14 below, OLGR will ensure that the relevant gaming machines at the transferee's premises are disabled.

The transferor will then be able to install and operate gaming machines at its own premises, or enter into another transfer with the same / another transferee.

A licence reissue will occur to reflect the change in entitlement status.

3.14 End of the transfer by an operation of the Act

Regardless of any agreement between the transferee and transferor, a temporary transfer is ended if:

- Either party voluntarily surrenders its gaming machine licence;
- Either party transfers its liquor licence;
- Either party has its licence cancelled by the chief executive;
- A controller is appointed to the transferee.

The entitlement transfer will also end, or the number of entitlements subject to the transfer will be reduced, if:

- The licence of either party relates to more than one premises (additional premises), and a premises named in this application ceases to be a premises on the gaming machine licence.
- The transferee, despite having obtained entitlements, does not install its approved number of gaming machines by a relevant date under section 80A or 85AA of the Act

Section 109T(4) of the Act requires OLGR to publish, on the application form for a temporary transfer, a notice stating how the temporary transfer is affected by licence cancellation, surrender and other events. **This notice is duplicated in Appendix 3 of these Guidelines.**

The applicants for a temporary transfer must declare, on the approved form through which the application is made, that the notice published under section 109T(4) has been noted, and appropriate arrangements made in the event that the transfer is ended by an operation of the Act.

Important: It is imperative that parties to a temporary transfer note the information on the application form and at Appendix 3 of these guidelines before entering the transfer.

The Act does not provide compensation to parties aggrieved by the end of a temporary transfer in the situations described in the notice and it is up to the club to protect its interests through other means.

Clubs are advised to seek legal advice before entering into a transfer. For further information, see Part 4 of these Guidelines.

3.15 When temporarily transferred entitlements become entitlements of the State

When an entitlement used in a temporary transfer becomes an entitlement of the State (see part 1.12), the transfer no longer has effect with regard to that entitlement and the transferee may not operate a gaming machine using the entitlement.

Part 4 Entering into transfers

4.1 Transfers are contractual and commercial matters

The chief executive views a transfer as a contractual and commercial arrangement between the clubs that are parties to the transfer.

The commission or the chief executive cannot intervene in any disputes regarding a transfer, including:

- A transferor's failure to obtain payment before settlement of a permanent transfer;
- Instances where a temporary transferee defaults on a payment;
- The premature end of a transfer due to an operation of the Act, as described in 3.14 above.

These are contractual law matters that must be dealt with through the appropriate court. Licensees are therefore advised to ensure that their interests are protected in the terms of the transfer.

4.2 Clubs should seek legal and financial advice

It is expected that clubs will enter into binding legal agreements over the transfer, whether permanent or temporary, of entitlements.

Whilst OLGR will not be privy to these agreements, it urges licensees to **seek legal advice** prior to entering into a transfer and to **have the agreement drawn up by a lawyer**.

Whilst a standard agreement is provided for optional use by the parties to a transfer, it is essential that clubs understand their obligations under any agreement, as the other party to the transfer may have a contractual law case against the club if the club does not meet its obligations.

Clubs are hereby advised to seek legal advice on **any** transfer regardless of how the agreement is drafted.

Additionally, clubs are advised to speak to their accountants regarding the tax implications of the transfer. As the transfer does not represent a transaction between the club and its members, the principle of mutuality may not apply and income from the transfer may be wholly assessable. Further queries along this line should be directed to the club's accountant, your consultant or the Australian Taxation Office. The transfer may also incur stamp duty.

Neither the chief executive nor OLGR can provide legal or financial advice to clubs. The chief executive will not retain, approve or comment on extraneous terms or conditions. These are contractual matters between the licensees.

4.3 Identifying the Parties to the Transfer

The application submitted to OLGR must be perfectly clear in specifying which licensed club is the applicant and transferor, and which licensed club is the transferee.

Identification of the transferor and transferees must be free from any extraneous information such as nominees, third-party managers or financiers.

Where extraneous information exists, the transfer application will be returned to the transferor for the amendments necessary to validate the application¹⁴.

If a transfer involves a third party, other than the club that is the transferor and the club that is the transferee, the agreement with the third party is extraneous to the transfer. This matter should be drawn up separately to the transfer, and need not be submitted to OLGR unless the agreement constitutes a management agreement under section 67 of the Act¹⁵.

Potential third parties are reminded that section 109ZF of the Act states that an encumbrance over an entitlement is of no effect.

Additionally, clubs should ensure that any extraneous agreements do not breach sections 340 to 342 of the Act. Serious breaches can occur if a person, other than duly elected executives of the club:

- has the ability to control certain applications made by the club, including an application to decrease the approved number of gaming machines; or
- has the ability to dominate decision-making about policies for the conduct of gaming on the premises; or

¹⁴ The chief executive considers that a valid application is one that identifies a club as transferee and transferor. Sections 109M and 109R allow a transferor, who is a category 2 licensee, to transfer entitlements to a transferee, who is also a category 2 licensee.

¹⁵ See OLGR *Guidelines - Management Agreements*

- has the capacity to enjoy the majority of benefits, or is exposed to the majority of risks, associated with gaming at the premises.

Additionally, section 342 of the Act prohibits any agreement providing a party with a direct or indirect interest in a percentage or share of:

- the amounts bet for gaming; or
- moneys, revenues, profits or earnings from the conduct of gaming.

4.4 Ensuring the transfer is valid

Licensees can ensure a smooth transfer by ensuring that the application is valid.

To assist licensees in this regard, transfer checklists are available at Appendix 1 (permanent transfer) and Appendix 2 (temporary transfer) of these guidelines.

The checklists do not address prerequisite applications and licensees must also ensure that a permanent transferor can meet any obligations with regard to the effective date of a prerequisite reduction, as described in part 2.3 above.

4.6 The Standard Agreement

For the assistance and protection of clubs, OLGR and Clubs Queensland are developing a *Standard Agreement – Permanent Transfer* and *Standard Agreement – Temporary Transfer*.

Use of the standard agreement will not be mandatory and the provision of the standard agreement does not negate any recommendation that the club obtain legal advice. If the club uses the standard agreement, it must ensure that it understands its obligations under the agreement. The other party to the transfer may have a contractual law case against the club if the club does not meet these obligations.

Further information will be available as the Standard Agreement is finalised.

4.7 Applying for a transfer or variation

Applications for a transfer of entitlements, or the variation of a transfer, must be submitted to the chief executive using the application form provided on OLGR's website (www.olgr.qld.gov.au).

The application must be accompanied by the prescribed fee (see *Current Fees and Charges* at www.olgr.qld.gov.au)

The transferor may lodge the application to:

Office of Liquor and Gaming Regulation
Locked Bag 180
CITY EAST QLD 4002

Part 5 Miscellaneous

5.1 Dealing with the transferor (supplier's) gaming machines

This section deals with the disposal of the physical gaming machine following a transfer.

Once a transfer (whether temporary or permanent) has taken effect, the transferor must remove any gaming machines that are not available for the conduct of gaming. The disconnection must, as always, be undertaken by a licensed repairer under arrangement with the club's LMO following application from the club via Form 57.

The disconnected machines may be stored for a maximum of two months without any further approval from the chief executive. For the purposes of section 225 of the Act, the chief executive approves the following premises, and the following way, in which the machines may be stored:

- The machines may be stored in a secure area on the licensee's licensed premises.
- The machines must not be powered.
- The area must not be accessible to the public.
- The area must be accessible to an inspector of the Office of Liquor and Gaming Regulation.

Once entitlements have been transferred to a transferee, the gaming machines that may be operated on the entitlements can be obtained from any authorised supplier (see *Approved Arrangements for the Acquisition and Disposal of Gaming Machines*).

It is extremely important that clubs remember that gaming machines are **not** entitlements and the transfer of entitlements does not, in itself, require that the transferee accept the transferor's actual gaming machines as well.

When a temporary transfer ends, the former transferee must apply to the chief executive for storage of the gaming machines if they are to be disconnected for a period greater than two months.

Part 6 Further Information

Further or related information is available in the following documents:

- *Club Reallocation Scheme FAQ*
- *Fact Sheet – Club Gaming Machine Entitlements*
- *Fact Sheet – Temporary Transfer of Entitlements*
- *Fact Sheet – Permanent Transfer of Entitlements*
- *Guidelines to the Authorised Sale of Gaming Machine Entitlements for Clubs*

Appendix 1 - Permanent transfer checklist

A permanent transfer must meet certain criteria defined in the Gaming Machine Act 1991 before the Queensland Gaming Commission can approve the transfer. The commission must refuse the transfer if the criteria are not met.

Requirements for permanent transferor (supplier)

Tick if True

- 1 Transferor satisfies one of option 1A or 1B below.

Option 1A: Transferor has more entitlements than approved gaming machines as a result of–

- the approval of a decrease in the approved number of gaming machines; or
- the cessation of gaming at an additional premises; or
- the surrender of the gaming machine licence.

Option 1B: Transferor has sought to satisfy the requirement above by attaching to the transfer application a duly signed and completed decrease application, notification of surrender, or notification of cessation at an additional premises (see note A).

- 2 Section 452 does not apply (see note B).

Requirements for permanent transferee (receiver)

Tick if True

- 1 The approved number of gaming machines fixed on the transferee's licence is higher than the sum of the transferee's total entitlements plus entitlements that are already transferred on a temporary basis to the transferee.

Requirements for transfer

Tick if True

- 1 Transferor and the transferee are located in the same entitlement region.
- 2 The number of entitlements to transfer does not exceed the number of surplus entitlements for the transferor (see note C).
- 3 The number of entitlements to transfer, when added to the entitlements owned by the transferee and any entitlements that are already temporarily transferred to the transferee, does not exceed the transferee's approved number of gaming machines.
- 4 Consideration for the transfer is monetary and between prescribed limits (see note D).
- 5 Consideration for the transfer does not provide the transferor with any direct or indirect interest in, or percentage or share of the amount bet for gaming, or revenues, profits or earnings from gaming.

Notes:

- A. The chief executive will process the surrender, decrease or cessation in conjunction with the commission's consideration of the transfer. Please note that clubs who are temporary transferees or temporary transferors are limited in their ability to apply for a decrease in the approved number of gaming machines.
- B. Section 452 prevents a club from transferring an entitlement received in the initial allocation until the entitlement has been used to operate a gaming machine. If the club has been approved an increase or licence as the result of an application made before 16 April 2008, and the club has not yet installed the number of machines for which it received entitlements in the initial allocation, section 452 applies. Section 452 does not apply if the club has (at one point since its last increase, licence or additional premises approval) operated the number of gaming machines currently approved on its licence.
- C. Surplus entitlements are calculated using the formula *transferor's total entitlements minus transferor's approved gaming machines* after the reduction.
- D. No limits are currently prescribed – consideration need only be monetary.

Appendix 2 – Temporary transfer checklist

A temporary transfer and its parties must meet certain criteria defined in the *Gaming Machine Act 1991* (the Act) before the Queensland Gaming Commission can approve the transfer. The commission must refuse the transfer if the criteria are not met. The relevant sections of the Act are provided against the criteria below.

Requirements for temporary transferor (supplier)

Tick if True

- 1 Transferor's licence displays a total of less than 30 approved gaming machines – s109V(2)
- 2 Transferor is not already a temporary transferor – s109V(4)(a)
- 3 Transferor is not a temporary transferee under another transfer – s109V(5)
- 4 Transferor premises has not been approved a licence, additional premises or increase in the last three years – s109V(3) (see note A).
- 5 None of the transferor's entitlements must be permanently transferred due to the approval of a decrease within the last twelve months – s109V(4)(b).

Requirements for temporary transferee (receiver)

Tick if True

- 1 None of the transferee's entitlements are temporarily transferred to another club – s109W(5)(a)
- 2 None of the transferee's entitlements must be permanently transferred due to the approval of a decrease within the last twelve months – s109W(5)(b)
- 3 The approved number of gaming machines fixed on the transferee's licence is higher than the sum of the transferee's total entitlements plus entitlements that are already transferred on a temporary basis to the transferee – s109W(2).

Requirements for transfer

Tick if True

- 1 Transferor and the transferee are located in the same entitlement region – s109W(4) (see note B).
- 2 The term for the transfer is between 1 to 8 years – s109U(2)
- 3 The number of entitlements to transfer, when added to all entitlements owned by the transferee and any entitlements that are already temporarily transferred to the transferee, does not exceed the transferee's approved number of gaming machines – s109W(3).
- 4 Consideration for the transfer is monetary and between prescribed limits – s109U(3) (see note C).
- 5 Consideration for the transfer does not provide the transferor with any direct or indirect interest in, or percentage or share of the amount bet for the purpose of gaming, or revenues, profits or earnings from gaming – s109U(4).

Notes:

- A. The three year rule does not apply if the application for a licence, increase or additional premises was lodged to the chief executive before 16 April 2008, and all gaming machines granted in the approval have been installed and operated.
- B. The entitlement regions are South-East, Coastal and Western. The entitlement region of each premises is displayed on its gaming machine licence.
- C. At present no limits have been prescribed – consideration need only be monetary.

Appendix 3 – Notice for Temporary Transfer

Notice

Section 109T(4) of the Gaming Machine Act 1991

Certain operations of the *Gaming Machine Act 1991* (the Act) will result in the cancellation of an existing temporary transfer. Operations of the Act require that the transfer will end if:

- either party voluntarily surrenders its gaming machine licence; or
- either party transfers the liquor licence; or
- either party has its licence cancelled by the chief executive; or
- the licence of either party relates to more than one site, and a site involved in the transfer ceases to be licensed premises under gaming machine licence; or
- a controller is appointed to the transferee.

The entitlement transfer will also end, or the number of entitlements subject to the transfer will be reduced, if the transferee, despite having obtained entitlements, does not install its approved number of gaming machines by a relevant date applied under section 80A or 85AA of the Act¹⁶.

The effect of these operations of the Act on the entitlements subject to the transfer are as follows:

- If the action is by the transferee (including the appointment of a controller) – the ability to use the entitlements returns to the transferor, who may immediately negotiate a new transfer with another club or use the entitlements to operate gaming machines.
- If the transferor voluntarily surrenders its licence or ceases to retain the transferor premises as premises to which its licence relates – the transferor must permanently transfer the entitlements to another club within 12 months of the date that the surrender takes effect. The temporary transfer cannot continue during this 12 month period.
- If the transferor licence is cancelled by the chief executive – the entitlements become entitlements of the State. The transferor will not have the ability to permanently transfer the entitlements and any claim to the entitlements by the transferee will have no effect.
- If the transferor transfers its liquor licence and a new gaming machine licence is issued in conjunction with the liquor licence transfer – the entitlements become the property of the new licensee at the transferor premises. The entitlement transfer ceases because the transfer of the liquor licence cancels the transferor's gaming machine licence. If the entitlement transfer is to continue, it must be renegotiated with the new licensee of the transferor premises, who may apply to the commission for approval of a new entitlement transfer if desired. The transferee cannot operate gaming machines using the entitlements until a new entitlement transfer is approved.

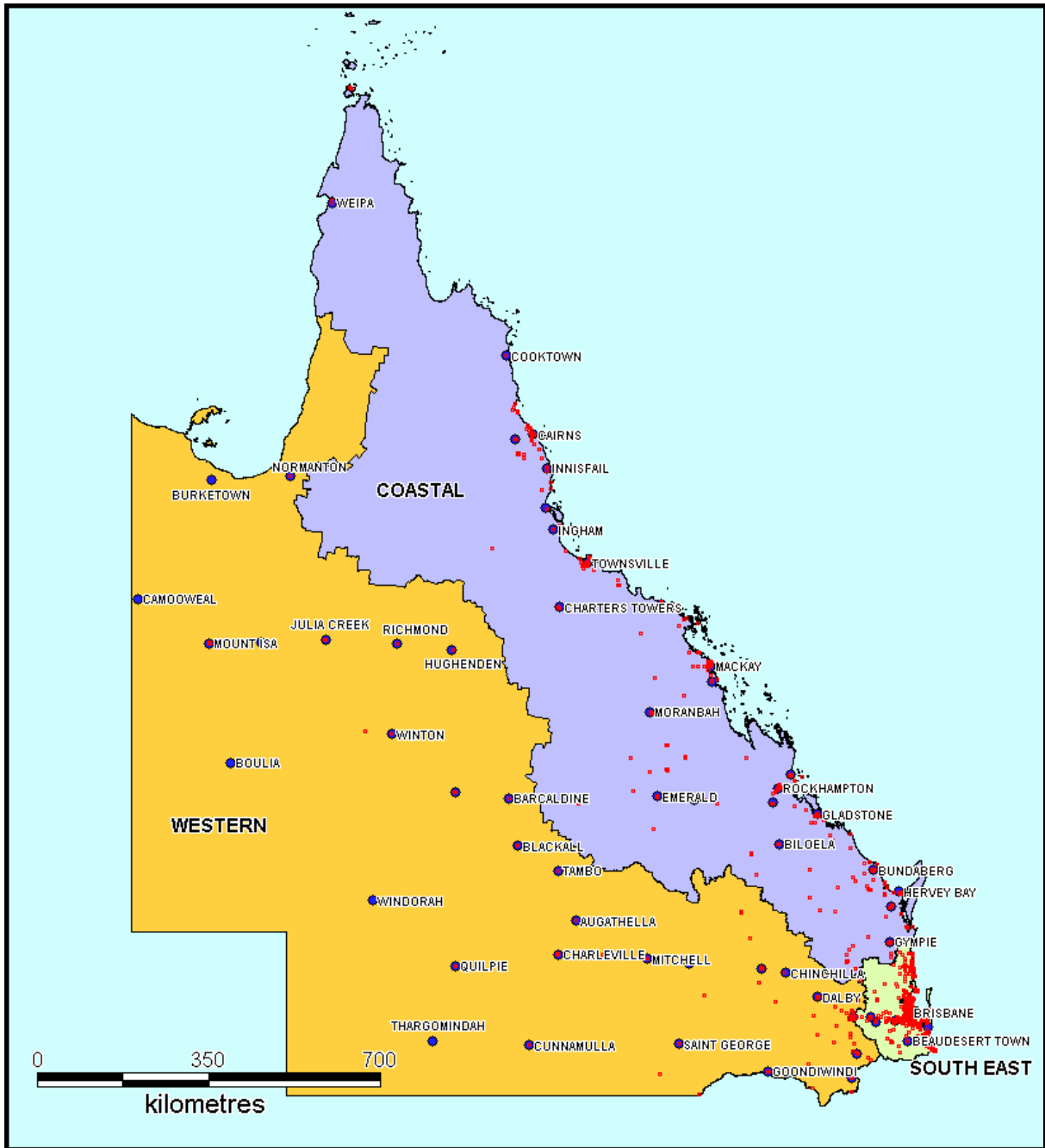
Suspension of either licence does not affect the transfer.

The Act contains no path to compensation for a party to a transfer that is aggrieved by an action of the other party. This matter may be addressed in agreements that are extraneous to the Act with disputes heard by the appropriate court. These agreements will not be provided to the Office of Liquor & Gaming Regulation (OLGR). OLGR or the Queensland Government will not be party to these agreements.

¹⁶ These sections require that if an applicant is approved a new licence or increase, the approved number of gaming machines for the premises must be installed and operated within one year (for an increase) or two years (for a new licence) of the approval. In exceptional circumstances, the commission may extend either period by an additional year. At the relevant date, the number of approved gaming machines for the premises is reduced to the maximum number operated since the approval.

Appendix 4 – Entitlement Regions

Overview



South-East Region Boundaries

