



BRITISH ASSOCIATION OF LEISURE PARKS, PIERS AND ATTRACTIONS

Tracey Crouch MP  
Parliamentary Under Secretary of State  
Department for Culture, Media and Sport  
100 Parliament Street  
London  
SW1A 2BQ

19<sup>th</sup> January 2018

Dear Minister,

## **REVIEW OF GAMING MACHINES AND SOCIAL RESPONSIBILITY MEASURES – BALPPA'S RESPONSE**

I am writing to respond to the Government's proposals for changes to gaming machines and social responsibility measures, published on the 31<sup>st</sup> October 2017.

BALPPA, in its response to the Call for Evidence, showed that there is a strong case for an increase in stakes and prizes for Category D - specifically pusher and crane machines - and we were disappointed therefore that the Government is not proposing to take forwards any increases for this category of machine.

BALPPA supports in broad terms the positions set out by BACTA with regards to non-complex Category D in its response to this consultation. However I also wanted to restate these arguments in order to reinforce the industry's position on this issue.

I was disappointed that the Government has dismissed the industry's proposals, and in particular that it does not appear to have given due consideration to the long period of significant economic difficulties experienced by BALPPA members, with levels of business at the seaside having been in steady decline for some years. As I stated in response to the Call for Evidence, many members have seen turnover in their arcades decline significantly, in some cases by up to half over the last 15 or 20 years. A large number of amusement arcades and seaside amusement parks have closed in the last two decades and those that remain continue to come under immense pressure.

As it takes forwards its proposed changes to stakes and prizes, it is crucial that the Government makes a clear distinction between complex Category D (such as low stake reel-based machines) and non-complex Category D (such as cranes, pushers and other categories including novelty ticket machines). Non-complex machines form the backbone of the seaside amusement industry and are vital.

I would like to reiterate the changes that BALPPA is calling for with regards to non-complex Category D machines and ask that the Government reconsiders its position with regards to this category:



- An increase in the maximum stake on a Category D pusher to be raised from 20p to 25p and the maximum prize from £20 to £22 with a cash prize no greater than £12 – currently set at £10. We made clear that this change would allow an increase in stake for ‘closed loop’ pushers that use tokens instead of money. This would allow more attractive prizes to be added to the bed of the current 2p pusher which is the leading product for the sector.
- An increase in the maximum permitted stake on a crane grab machine to be raised from £1 to £2 and the maximum prize from £50 to £75. We explained that the larger stake would encourage greater investment in machines and give consumers greater choice on how much they want to spend. The increase in prize would allow prizes to be offered commensurate with the increase in stake and for prizes to be offered that were sufficiently desirable, such as popular electronic items.
- An uplift for Category D Other machines, these machines are games of chance that pay out redemption tickets. BALPPA is calling for an increase in the maximum permitted stake on a non-cash payout machine to be raised to 50p (from 30p) and the maximum permitted non-monetary prize to be raised to £10 (from £8). Inflation alone justifies these increases.

The case for these increases remains clear and we ask that the Government reconsiders BALPPA’s request for changes with regards to non-complex Category D. These products have been enjoyed harmlessly by families as part of a day out at the seaside for generations. Research carried out by PWC on behalf of the industry demonstrates that public attitudes are not against an increase in stake and prize for non-complex Category D machines and that an increase would make these machines more attractive to our customers . Indeed our proposals for these machines are in line with those that the Government has agreed to take forward with regards to prize bingo.

It is important to note that few people would consider the playing of Category D machines to constitute a form of gambling and it is only the technical definition of gambling that makes these machines fall under this umbrella. There is no discernible evidence of any public or private concern about young people playing Category D non-complex machines which for most people are a fun and lighthearted activity enjoyed on their seaside holidays. It is for this reason that any additional player protections – as referenced in the consultation document as being the reason for not taking our proposals forward – would be wholly unnecessary and disproportionate.

The evidence referenced in the consultation document suggesting a link between early gambling activity and problem gambling later in life is highly questionable and it is also inaccurate for the consultation document to suggest that Great Britain is unique in allowing under 18 gambling given Category D non-complex machines can be found in many other jurisdictions internationally.

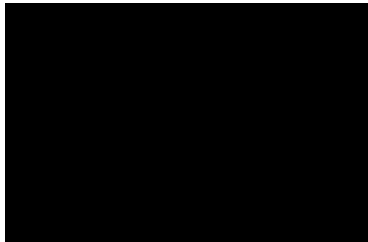


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Against this background, BALPPA is asking that the Government reviews the position that it has taken with regards to non-complex Category D machines.

Please do contact me should you require any further information or clarification on the issues set out above.

Yours sincerely,



**Paul Kelly,  
Chief Executive  
BALPPA**