



Response to the consultation from DCMS on Proposals for changes to Gaming Machines and Social Responsibility Measure from the Racecourse Promoters Association.

We are a trade association representing all the GBGB licensed greyhound racecourse promoters who are licensed by the Gambling Commission as both Premises Licence holders and non-remote pool betting operators and welcome the opportunity to comment on the proposals included in the consultation issued by DCMS on 31 October 2017.

Given that the focus of this consultation is mainly on gaming machines and views relating to any proposed changes in both stakes and prizes we have sought the view of those members most interested in this aspect of the consultation.

For the majority of our members the adoption of the right as regards the use of B2 machines for example is not in the main now taken up.

We would also wish to record the particular point being made by others to this consultation, in that an attempt seems to be being made to settle a level of stake and prize money in the absence of definitive evidence as to what the likely outcomes in relation to problem gambling will be.

Interestingly, the consultation paper itself identifies that other factors such as geographic location and whether or not someone is employed can have a material bearing on their predilection to high use of gaming machines.



23 January 2017

The Consultation questions and responses

Q1 Do you agree that the maximum stake of £100 on B2 machines should be reduced? If yes, what alternative maximum stake for B2 machines do you support?

A It would seem from the evidence referenced in the consultation itself that there is not a clear causal link between the level of stake and problem gambling and therefore the case has not been made that the stake or prize level should be reduced.

Q2 Do you agree with the government's proposals to maintain the status quo on category B1?

A No comment

Q3 Do you agree with the government's proposals to maintain the status quo on category B3?

A No comment

Q4 Do you agree with the government's proposals to maintain the status quo on category B3A?

A No comment

Q5 Do you agree with the government's proposals to maintain the status quo on category B4?

A *No comment*

Q6 Do you agree with the government's proposals to maintain the status quo on category C?

A *No comment*

Q7 Do you agree with the government's proposals to maintain the status quo on category D?

A *No comment*

Q8 Do you agree with the government's proposals to increase the stake and prize for prize gaming, in line with industry proposals?

A *No comment*

Q9 Do you agree with the government's proposals to maintain the status quo on allocations for casinos, arcades and pubs?

A *No comment*

Q10 Do you agree with the government's proposals to bar contactless payments as a direct form of payment to gaming machines?

A *No Comment*

Q11 Do you support this package of measures to improve player protection measures on gaming machines?

A *We are in support of measures to improve player protection on gaming machines where there is evidence that the measures themselves are having the desired effect.*

Q12 Do you support this package of measures to improve player protection measures for the online sector Q13

A *Answer as for Q12 above.*

Q14 Do you agree the Government should consider alternative options including a mandatory levy if industry does not provide adequate funding for RET?

A *There is no need to make the contribution to RET mandatory whilst there is the facility for the Gambling Commission as the regulator and recipient of the regulatory returns containing this detail to identify where the shortfall lies.*

Q15 Do you agree with our assessment of the current powers available to local authorities

A *Our observation is that the existing powers available to local authorities are sufficient to manage and there is thus no need to introduce cumulative impact assessments as well.*

Q16 Are there any other relevant issues, supported by evidence, that you would like to raise as part of this consultation but has not been covered by questions 1-15.

A *No comment.*

END