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16th January 2004

WAC/rmg

Brian H. Donohoe, MP
House of Commons
LONDON
SW1A 0AA

Dear Brian

PROPOSED GAMBLING BILL

I am sure that you are aware that the proposed Gambling Bill was recently published by DCMS and written evidence requested by the Joint Scrutiny Committee whose task it is to review the Bill.

I have decided once again to ask for your help in relation to my general and specific concerns that I have with this bill in its current format. I operate 4 amusement arcades in the local area, one in Dumfries and one in Glasgow and overall employ in excess of 70 people. I hope that you will be able to make representation to either John Greenway, MP (Chairman of the Scrutiny Committee) or any of its members.

General Concerns:

Fairness and Equity

I believe that opportunities and controls should be equally applied between the market sectors and not, as is currently being proposed, only favour the new emerging sectors (large casinos and remote gambling). Many of the existing traditional machine market sectors (seaside arcades, inland arcades, pubs, bingo etc) are facing restrictions relating to machine numbers, stakes and prizes, whilst new sectors (casinos and remote) will be able to offer a multiplicity of gaming products with virtually unlimited stakes and prizes.

It should be remembered that whatever the new entrants may generate in terms of economic benefits and jobs, the existing machine market place employs in excess of 22,000 people directly and generates circa £400K per annum in tax revenue. Businesses range from large multi-national subsidiaries to third or fourth generation family businesses like my own who provide pleasure and entertainment to millions and form an important part of the UK's social infrastructure.

Economic Impacts:

Seaside Resorts:

New style casino resort complexes will be so vastly superior in terms of size, range of product offering etc that new and existing visitors will naturally gravitate towards these "emporiums", slowly destroying much of the existing seaside economy. Resort and large casinos will be adult gambling environments providing scant impetus for social and tourism led regeneration.

Remedy: Follow a cautious approach and allow the phased introduction of a limited number of new style resort and large casinos within a controlled number of designated areas where a clear economic and social benefit is deemed likely. This compromise would allow this exciting new product to be market tested in the UK without risking the potentially disastrous social and economic consequences illustrated above.

Grandfather Rights

The Bill does not include measures reflecting the assurances given by Lord McIntosh in his speech to the BACTA Convention 2003 that the existing industry would not be endangered. In most cases the future of these businesses (whether they be seaside amusements, adult gaming centres or machines being operated in public houses) could be left to the discretion of Local Authorities which may unilaterally decide not to grant permits to businesses that may have been operating for generations and there is no right of appeal. This would be totally unacceptable to BACTA and we seek confirmation that the final draft will incorporate these matters.

Remedy: Grant "grandfather rights" to existing businesses in perpetuity, providing they operate within all relevant legislation and codes of conduct.

Traditional seaside businesses

FEC's/Category D machines. The Bill allows a discretion to introduce an age restriction for Category D machines by means of secondary legislation. Such a move would appear likely to wipe out the seaside entertainments industry. There are no grounds for this measure as our research (ORB) has shown. This potential change will make future investment in the industry an unrealistic prospect. This position is totally unacceptable to BACTA as it will significantly affect many members who have for many years provided much needed investment into the coastal resorts.

Remedy: Remove the enabling clause, allowing an age restriction for Category D machines only through primary legislation with full consultation, should evidence from research prove that change is required.

I apologise for the lengthy list of concerns highlighted, but I am sure that you will appreciate just how worried I am that the draft Bill being proposed could ruin our business unless changes are made.

I do hope that you feel able to help by contacting members of the Scrutiny Committee and look forward to hearing from you in due course.

Your help in this matter would be most appreciated.

Kind regards

Yours sincerely

A handwritten signature in black ink, appearing to read 'Billy Cullis', with a stylized flourish at the end.

Billy Cullis