

LETTER TO THE MINISTER

“This is ... a critical time for the whole land-based gambling sector, a time where we need all the help and support it can get, including from you as our Minister for Gambling”

The **Gambling Business Group** has written to the gambling minister Baroness Twycross to convey the industry's disappointment at the pace and commitment to reforming the antiquated gambling laws. The GBG is pressing for a more progressive approach. Here, Coinslot reports what chief executive Peter Hannibal had to say.



24th April 2025

The Baroness of Twycross
Minister for Gambling
Department for Culture, Media & Sport
100 Parliament Street
London SW1A 2BQ

E: cmtwycross@dcms.gov.uk

Dear Baroness Twycross

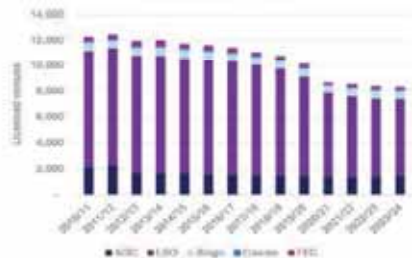
Thank you for your letter dated April 3rd 2025 regarding your land-based priorities for the coming months.

We have spent a protracted four and a half years working with your Department and the National Regulator on a Gambling Act Review, which included a White Paper (published 2 years ago this week) containing proposals that you said last year you were 'broadly supportive of'. You also said in your speech to the GambleAware conference last December that: "in Opposition Labour supported the 2023 gambling white paper. In Government, we will continue to do so. I want to work with you all, with the Gambling Commission and with the gambling industry, to continue to deliver the key reforms it sets out. I know many of you are eager to hear our plans".

It is therefore most disappointing that those proposals are only selectively being progressed through with no clear definitive road map. All businesses require certainty to be able to invest and grow. Delivering the remainder of the White Paper in its entirety would help us to help the Government in this objective.

It is reassuring to hear that the Government recognises the importance of FECs, bingo clubs and perhaps casinos. It is also helpful to know that the Government appreciates that the FEC sector's GGY is lower than it was before Covid-19 and that you want to see these venues thrive. However, it is not just the FEC sector that is in this position. Please see below a factual chart using the Gambling Commission's Industry Data that clearly shows a real term decline in consumer spending in ALL land-based sectors, not just FECs.

Licensed gambling expenditure (GGY) in Great Britain, 2009-2024



This decline is having a negative impact on our high streets, especially outside of the M25. We are aware that there are those who do not agree with any gambling activity, and as a consequence, they campaign hard to reduce the number of gambling venues even further. Conversely, land-based (venue) gambling for the vast majority who take part in their social interaction, their fun and enjoyment, and leisure time. Sometimes their 'only' leisure time and 'only' human interaction.

It should be noted that whilst AGCs were singled out in your letter regarding risks to the vulnerable, every land-based sector is working closely and collaboratively with the Gambling Commission to continually improve the way in which they protect and interact with consumers. We are acutely aware that the provision of gambling products and services requires high levels of consumer protections (as do many retail propositions). Gambling is subsequently regulated at a very high level, especially when compared to all other retail verticals.

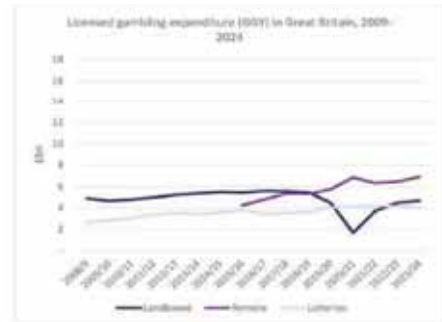
If there are 'individual instances' of non-compliance then the National Regulator has the power, the ability and the basic job to address this on an individual basis. The GBG and its Members do not believe it is fair that a whole sector is held back because of the behaviour of individual licensees.

In this regard, we would be very keen to facilitate showing you how the AGC/Arcade sector protects its consumers as you have requested in your letter. Our Members are more than happy to host site visits or meetings in line with your availability.

Land-based gambling is also having to deal with all of the other challenges posed such as increased employers National Insurance contributions, increases in National Minimum Wage rates and the most expensive energy costs in Europe. We are expecting more venues to close as a result of these pressures.

This is therefore a critical time for the whole land-based gambling sector, a time where we need all the help and support it can get, including from you as our Minister for Gambling.

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- Reported GGY for land-based gambling as a whole in 2023/24 was the same as it was in 2008/09.
- Zero growth in 15 years against 2.9% average inflation every year and a 10% growth in population.

All land-based sectors need your support by delivering all relevant proposals in the White Paper. We are aware of the current Government's objective for growth, and to single out subsectors for support is at best a missed opportunity, at worst it is potentially very damaging to those excluded.

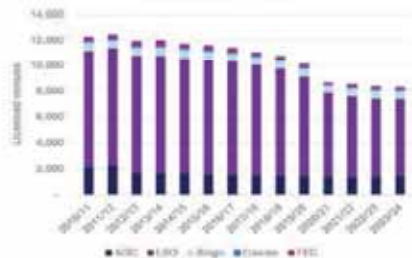
Similarly, singling out Category D machines for a review of stakes and prizes is effectively determining the outcome of a Triennial Review (for all machines) without gathering and evaluating the factual evidence available to inform such a selective decision.

There is no mention in your letter of the hard work and effort that your Department has contributed towards the White Paper proposal to remove the debit card prohibition (cashless) when playing gaming machines. This change is necessary not for growth or development, it is critical for land-based gambling as a whole to catch up with all other retail businesses who have been processing digital cash for many years. Without the removal of this archaic piece of legislation, gaming machines will inevitably disappear altogether.

Below is a chart produced again from the Gambling Commission's Industry Data that shows a one third decline in the number of licensed gambling venues between 2011 and 2024. Contrary to some anti-gambling opinions, there are 4000 fewer venues today than there were in 2011, with the largest decline in Betting Shops and AGCs.

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Licensed gambling venues (operating) in Great Britain, 2011-2024



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We therefore ask that you extend the priorities in your letter to include the delivery of all of the land-based proposals in the Government White Paper in the shortest time scale possible.

Yours sincerely

Peter Hannibal
Chief Executive

And finally....

VE Day: Tribute to the fallen

A very special mention to Martin Agabeg and his team at NSM Music who have booked a commemorative advert in this week's edition of Coinslot to mark VE Day on 8 May.

The 80th anniversary of the end of the Second World War, Martin wanted NSM and the industry to pay tribute to those that fought for freedom, to honour the fallen and to remember with gratitude how they gave everything for peace.