

## Gaming Machine Technical Standards

# Peter Hannibal: “The industry has been a willing partner in the GMTS project - it does need streamlining and adjustment to new innovations and developments. That said, it needs evolution rather than revolution...”

The **Gambling Business Group** has lodged its response to the Gambling Commission on Gaming Machine Technical Standards. It's both robust and practical - where the consultation proposals put forward are weak, the GBG shoots them down. And where they are viable, the body explains how they can be applied in a successful and cost effective way. GBG chief executive Peter Hannibal provides some clarity and reason to a consultation that is neither.

It is, in many ways, the most complex and concerning adjustment to the Gambling Act Review currently under consideration and the deadline for the industry's response closed last week.

The Gambling Business Group submitted its own response to the Gambling Commission on behalf of its members, a thorough and detailed 19-page line by line analysis of the far-reaching, and in far more ways than the consultation probably should be, over-reaching options laid out by the regulator.

It would be fair to say that the GBG has taken a progressive approach to the task - it is, after all, one of the most knowledgeable and expert authorities on gaming machine technical standards there is out there. It knows its stuff. Which, reading between the lines, the authors of the consultation possibly didn't, at least in the important day to day operational detail.

Peter Hannibal, chief executive of the GBG, was a little more diplomatic when he spoke to Coinslot about the consultation and the direction of travel it was aiming for.

Anticipating that, we thought it best to go with the direct question: so, is the industry being screwed?

Hannibal smiled. "This is such a wide ranging consultation that could have major repercussions for every business on the high street, including members clubs, so I can see where you're coming from," he responded. "The proposals as written would impact businesses financially, operationally, technologically - and also impact their customer base who have strong affiliations to machines and their entertainment value. So your question isn't misplaced: it's only realistic to conclude that there are a number of propositions within this consultation with the potential to be highly damaging. And existentially damaging to many operators and clubs."

But, he was quick to add: "Remember though, this is a deep dive into GMTS - and by its very objective, it will be controversial and challenging. But we've approached it with a sense of real-



ity that, I'd say, is probably absent from the consultation framework. At the same time, though, we all recognise that GMTS has to evolve with market demand and technical innovations - it will always require some standardisation, some legacy lee-way, but most importantly, a sensible

and proportionate approach. And that is what we are asking for in the outcome."

That sensible approach was laid out in the very first page of the GBG response.

• Any GMTS changes should be forward look-

## Evidence is key

**Peter Hannibal said...**

**"I have to say, and as forcefully as possible, any change to the technical standards - and indeed everything involved with the Gambling Act Review - must follow the evidence..."**

ing only - none of the changes should apply retrospectively to older games or machines as the costs far outweigh the theoretical (and still undefined) benefits;

- The entire machine should not be classified as new for the purposes of the GMTS when one new game is updated/added. The timescales, costs and benefits cannot be justified or quantified;
- Where possible, the GBG argues the focus should be on the machine (or system) delivering the changes, not the games;
- If GMTS changes are forward looking only, then members' clubs (Cat B3a and B4) should be in scope to give a level playing field - with the exception of the staff alert proposals;
- If the new GMTS requirements only apply to new machines (or games), then the 6 months timescale is reasonable. However, a much longer lead in time and effective trialling process for staff alerts is required;
- There are concerns over staff alert proposals - the GMTS is a technical standard and the proposed social responsibility/customer interaction requirements should sit in the Licence Conditions and Codes of Practice;
- GBG Members are willing to work with the Gambling Commission to develop the various gaming machine protocols to facilitate the GMTS proposals, including a new 'staff alert protocol'

Sensibly put, but does the Commission see it this way?

"That's difficult to say really, but they appear to be very receptive. The consultation default is clearly draconian - its objective is to determine the parameters for change and how far it can go.

"We argue, and I believe compellingly so beyond any doubt, that GMTS does have room to manoeuvre to the benefit of the customer, the regulator and the industry. And we have explained exactly why and how it can be applied in our response.

"But I will say, there's probably some distance from the Commission's original thinking."

While that will surprise few, where does Hannibal see this materialising?

"Cost will certainly be one key factor," he noted. "Our evidence is that the cost of some of the proposed GMTS changes will be far too over-burdensome, critically so for smaller businesses.

"With the levy coming in, no triennial review in sight, and tax rises - the Commission's vision for GMTS is simply disproportionate and cannot be justified. It will hit every high street in the UK."

And on a practical level too?

"Yes. Don't forget, the industry has been a willing partner in the GMTS project - it does need streamlining and adjustment to new innovations and developments. That said, it needs evolution rather than revolution, which is why we've made some really

key practical recommendations to the proposals."

Sensible is clearly emerging as a common description for the GBG consultation response. But, there's still a lot of "Strongly disagree" references throughout the document. The GBG has not held back on pushing back.

- Our Members do not believe that any of these proposals should be mandated for games or machines retrospectively;
- The paucity of real evidence of the 'need' (or benefit) for this proposal is not proportionate with the huge cost of applying them to existing Category B1, B3, B3a and B4 gaming machines;
- If the Commission proceeds with the inclusion of staff alerts in the GMTS the proposed 6-month timescale is completely unrealistic;
- GBG Members disagree with the test house proposal and request that the submission date to the test house is the date to determine whether a machine is classed as new or existing;
- GBG Members agree that the customer set limits trigger breaks in play at 30 seconds on the machine set limits, but not for default limits. The proposed 30 seconds for every default limit will be unnecessarily invasive and disrupting, potentially compelling customers to play more than one machine to ensure continuity of play;
- Whilst we have no objection to the principle of showing Safer Gambling messaging, this messaging should be delivered through the system (and not game controlled) which would also make it more straightforward to update in future.

Hannibal was unmoved.

"It's a consultation. There are many clauses that are simply not proportionate and are unworkable for many environments, and we have made our views clear. However, we've also offered far more manageable and practical alternatives in many areas and I believe these are well within the scope of agreement with the Commission."

Looking forward, there are still some research responses from industry to be lodged, and cost analysis of the GMTS proposals from key operators to be supplied, so the obvious question is what next?

"I like to think that the evidence will direct the Gambling Commission to a sensible and pragmatic solution on GMTS.

"But I have to say, and as forcefully as possible, any change to the technical standards - and indeed everything involved with the Gambling Act Review - must follow the evidence.

"And that evidence must be trustworthy, factual and reliable. The Gambling Act Review will not have done its job with honesty if factual evidence is not the basis for decision making."

## From 'Oven to Icon': Game Nation customers join National Sausage Roll Day celebrations

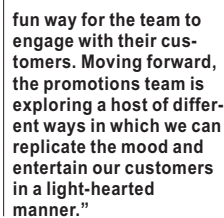
### EVENTS

Adding an upper case A to the Amusement With Prize experience sits at the heart of **Game Nation's** latest initiative which saw it celebrate National Sausage Roll Day distributing meat and vegan versions of the British snack icon to customers.

**G**ame Nation the high Street gaming retailer joined world-famous tourist attraction Madame Tussauds in marking National Sausage Roll Day which was celebrated June 5th.

Madame Tussauds, situated on London's Baker Street unveiled a hand-crafted wax sculpt of a Greggs sausage roll presented on a regal blue velvet cushion and elevated on a plinth. The Sausage Roll is being shown as a temporary exhibit in Madame Tussaud's Culture Zone, a space dedicated to those who have helped shape the landscape of British culture including the likes of Sir David Attenborough, Stormzy and William Shakespeare. As Tussauds, surprised visitors with its first ever food exhibit members of the Game Nation team were welcoming customers with a free flakey pastry snack which thanks in no small part to Greggs which sells 1 million a day - has become an icon of British cuisine.

Explaining how the initiative came about Game Nation CEO Mark Jepp said: "Our in-house marketing and promotions team thought it would be a great idea to join in the national celebrations by handing out free sausage rolls to customers in-venue. We distributed hundreds of sausage rolls - including a Vegan option to meet all dietary and cultural requirements - across the Game Nation estate providing another



fun way for the team to engage with their customers. Moving forward, the promotions team is exploring a host of different ways in which we can replicate the mood and entertain our customers in a light-hearted manner."