

RESPONSES TO THE QUESTIONS CONTAINED IN THE DCMS CONSULTATION DOCUMENT REVIEW OF GAMING MACHINES AND SOCIAL RESPONSIBILITY.

Electrocoin is a manufacturers of Arcade Games, FEC games and has been a gaming machines supplier since 1976. We have closed our manufacturing facility and downsized from over 300 employees to 20 today, and without a change in circumstance, we do not see a bright future for UK suppliers without a new product for the UK market to start to work on as AWP (amusement with prize).

Electrocoin is a member of Bacta, the trade association representing the machine industry, and we support their submission in its entirety.

The review of stakes and prizes will assist thousands of small family businesses, many of which represent an important part of coastal tourism, machine suppliers, manufacturing, bingo, sporting and working men's clubs, pubs, LBO's and the casino sectors. We believe these measures provide a lifeline to a legitimate industry that provides fun and entertainment while striking the right balance to deliver social responsibility best practice.

Changes to stakes and prizes for gaming machines will be connected with improved social responsibility and the introduction of tough new measures which support the Gambling Act 2005 Licensing Objectives which are to keep crime out of gambling, to ensure that gambling is conducted in a fair and open way and to protect children and the vulnerable from harm arising from gambling.

Q1. What, if any, changes in maximum stakes and/or prizes across the different categories of gaming machines support the Government's objective set out in this document? Please provide evidence to support this position.

Bacta has set out in its submission a range of fully evidenced proposals that meet the Government's objectives. The package of changes they propose will provide the growth we need. There is little or no evidence that the product we provide is a significant contributor to gambling related harm, nevertheless the industry takes its responsibilities in this area seriously and has, and will continue, to provide a socially responsible offer to its customers. A number of new initiatives in this area are underway.

For us the most important factor is the approval of a new B5 Entertainment machine will allow us to start to diversify away from just slots games and start again to offer real entertainment and value by way of different machines. Adult pusher/penny falls machines with lots of features, horse racing, in play football games etc I attach below some images of proposed ideas with a £5-£10 30-60second b5 machine with a limited entertainment jackpot of £125.

Horse Racing

Mechanical Multiplayer Games with everyone playing against the machine odds, with CASH OUT at any time during the race



Video Gaming machines again in play betting, etc

Multiplayer OR Single machine play against the machine

Long time play and even interactive – train your horse, race against other horses, interactive FUN and elements of skill.



Texas Hold Em

POKER HOLD EM'

Stake between 10p-£2 on each round:

1ST bet ON Entry/HOLD cards

2nd on the FLOP,

3rd on the turn final bet on the river...

OR fold at any time...

£10 MAX BET £100 MAX prize with extra awards or capped below...



Virtual football bet – again with in play bets – Football in the arcade whereby – odds are changing next corner, next goal, next foul... maybe even add from real games and events... with element of skill with timing.. bet on the outcome of free kick/Penalty..

Odds per corner:

4/1



2/1

3/1

5/1

Q2. To what extent have industry measures on gaming machines mitigated harm or improved player protections and mitigated harm to consumers and communities? Please provide evidence to support this position.

Electrocoin support Bacta's stance, and the evidence that they have provided.

Q3. What other factors should Government be considering to ensure the correct balance in gaming machine regulation? Please provide evidence to support this position.

Again, Electrocoin support Bacta's stance, but would like to state in the strongest terms how we believe that the B2 product currently allowed in LBOs and casinos are toxic and should not be allowed on the High Street. Evidence proves that they cause harm, not only to the player, but to the industry as a whole. We urgently seek a reduction in the stake from £100 to a sensible figure be it £2, £10 or £20.

Q4. What, if any, changes in the number and location of current gaming machine allocations support the Government's objective set out in this document? Please provide evidence to support this position.

We therefore support Bacta's proposal regarding a new B5 machine which should have a minimum of 10% allocation so that operators can directly target the Legacy CAT Cs that we want to replace.
Keep B3 % as is, without any further changes needed.

Q5. What has been the impact of social responsibility measures since 2013, especially on vulnerable consumer and communities with high levels of deprivation? Please provide evidence to support this position.

Electrocoin support Bacta's position and evidence provided.
We also refer to the London Borough of Newham Council and their submission with respect to community deprivation.

Q6. Is there anything further that should be considered to improve social responsibility measures across the industry? Please provide evidence to support this position.

Electrocoin support Bacta's position and evidence provided.

Q7. Is there any evidence on whether existing rules on gambling advertising are appropriate to protect children and vulnerable people for the possible harmful impact of gambling advertising?

No comment.