

24th April 2001

The Secretary
The Environment, Communication, Information
Technology and the Arts Legislative Committee
S1.57
Parliament House
CANBERRA ACT 2600



RE: INTERACTIVE GAMBLING BILL 2001

The Interactive Gambling Bill 2001, is important legislation that must achieve what is required, while at the same time not creating unforeseen problems.

The State Retailers Association was one of the first to correctly identify the real impact and likely damage of poker machines and so we welcome any legislation which will inhibit the growth of this innocuous pastime.

However, we are concerned that Part 1 Clause/Section 6 of the Bill precludes all existing on-line wagering systems in Australia that may, for instance, use a telephone line in the course of their currently legal business.

In particular, we refer to the services used by SA Lotteries which it would appear are at considerable risk due to the intent or likely outcome of the implementation of Clause 6.

While the Bill provides for the Minister to make a determination specifying the type of service that constitutes a "central service", that determination should be done now (in this case) and incorporated into the Bill.

This will avoid the damage that will clearly be done to the existing legal and socially acceptable wagering system operated by SA Lotteries and in turn forming a very important cash flow component of countless small retailers across South Australia who act as Lotteries Agents.

We don't consider that the Lotteries' products are anti-social by their nature and the resulting wagering activities are not seen as being habit forming, compulsive or socially questionable.

We would therefore urge you to review the very likely interpretation and outcomes of Clause b as it relates to the current use of telephone lines or a listed carriage service for on-line wagering of the type used by SA Lotteries and involving Australian players.

For organisations to have to apply for a Ministerial exemption after the gazetting of the Bill could well result in a loss of income for them and their agents and at the same time show the process, despite consultation, to have been deficient in the first place.

Yours sincerely

John Brownsea
Executive Director