

NB LEISURE LIMITED

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To Whom it May Concern,

NB Leisure own and operate two bingo clubs in Scotland and we write in response to the Scottish Government Call for Evidence in relation to "Fixed Odds Betting Terminals" and Betting Premises.

As a small independent business we are greatly concerned at the debate concerning the use of FOBTs and how this may impact perceptions both in Government and the general public of the wider gambling industry in Scotland and in particular small bingo premises such as ours.

The call for evidence arises from a suggestion by the Scottish Government that the Scotland Bill does not go far enough to meet the proposals in the Smith Commission. Although the Smith Commission and the Bill itself are both focused on FOBTs we understand a number of amendments have been lodged with Westminster and that this could see the original proposal to limit FOBTs in betting shops changed to something completely different, giving Scotland the power to reduce or lower machines of any category on any premises.

As a licensed bingo business we are not entitled to offer FOBTs nor do we want to. We provide session and interval bingo as well as machine amusements for our customers. It is very concerning for an independent operator such as us that the gambling industry appears to be viewed through the prism of FOBTs and bookies. The gambling industry in Scotland is not just about FOBT machines and we urge both Westminster and the Scottish Parliament to consider the wider benefits of a legal gambling business to communities and leisure offerings, and remember that gambling law and regulation is not just about 4 or 5 big bookmaker chains. This is particularly

the case with bingo clubs such as ours which are heavily reliant on a loyal customer base from the local community many of whom come to enjoy our facilities not just to play bingo but to socialise with friends whether gambling or not.

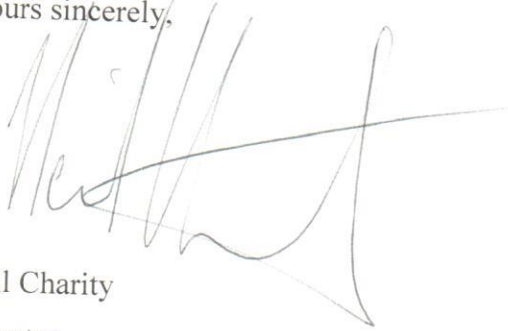
We run our premises responsibly and our internal policies and procedures are vetted and approved by the Gambling Commission. These proposals suggest that Scotland could be given powers which would mean our machine entitlements could be removed. This would be catastrophic for a small business like ours and this is very concerning for us given bingo premises have never been associated with problem gambling in the way FOBTs have.

Our reading of the Smith Commission report is that it did not intend anything other than restricting FOBTs on betting premises but if a combination of the amendments proposed by the Scottish Government to the Scotland Bill were to come to pass, it would mean our business and livelihood would be subject to significant threat. We are therefore opposed to any power which removes our existing entitlement to use B3, C and D machines in our bingo premises. If the perceived mischief is FOBTs, then that is the type of machine which should be restricted.

It has been a difficult time for the bingo trade, especially small local operators like us, following the smoking ban and the Gambling Act itself which has given preferential treatment to betting premises by making them the only sector which is allowed to use FOBTs. The playing of other amusement machines is a leisure activity enjoyed safely by our customers and the use of machines supports the overall revenue of our business as well as being part of the wide mix of facilities we offer.

Our premises are very much a part of the local community offering a safe and enjoyable leisure space which is regulated and well-managed. The proposals which now sit with the Scotland Bill could have serious unintended consequences for our business. Given bingo is recognised as offering "soft" gaming and a low-risk social environment, it would be manifestly unfair for our operation to be placed under threat because of fears over FOBTs.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Neil Charity', with a long horizontal stroke extending to the right.

Neil Charity

Director

NB Leisure Ltd