

## **SUBMISSION FROM CITY OF EDINBURGH COUNCIL**

The City of Edinburgh Council would make the following comments:

It notes the proposal to devolve powers for B2 fixed odds gaming machines to the Scottish Parliament.

The Council does not think it appropriate that this provision should only apply to 'new premises', as opposed to applying devolved powers to all premises which have fixed odds betting machines. To have a two tier enforcement regime risks duplication, and is likely to confuse and frustrate both the public and the industry. It would also mean that different rules could apply depending on whether or not a premises is new, which would undermine confidence.

The Council notes that within casinos there are likely to be stronger controls and that the number and use of these terminals is a matter of public concern. The ability to control the number of premises and terminals therein should be devolved.

In relation to the proposal that licensing in all premises should be devolved, there is a risk that this will increase the costs of enforcement. In relation to casinos, this would involve devolving only a portion of betting activity in these premises as the gambling commission is responsible for the majority of activity.

As a consequence, further widening of the scope of 'premises' to include casinos should only take place if a significant majority of enforcement is transferred at the same time.

Local authority powers regarding entry and inspection of those premises licensed under the 2005 Act need to be clarified in parallel. This issue was highlighted when the Committee dealt with the Air Weapons and Licensing (Scotland) Bill.