



Department of the Premier and Cabinet

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Action Officer	Stuart Hocking
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Gambling Policy
Department of Treasury and Finance
GPO Box 1045
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Dear Mr Hocking

I refer to your Minute of 20 March 2008 relating to an issues paper on the regulation of the bookmaking industry.

The Office for Racing proposes to make comment only on the licensing of bookmakers and the issue of permits.

With respect to the licensing of bookmakers this Office is of the view that licences should be issued for a period greater than one year. It would seem reasonable that this period be at least 5 years. There are numerous examples of licences being granted beyond one year, e.g. major betting operations licence, on-course totalisator betting licence and individuals drivers' licences.

Given that all licensed bookmakers are required to lodge a bond to cover any debts that may be incurred, relating to that person's bookmaking operations, and the fact that the Office of Liquor and Gambling Commissioner monitor, on a weekly basis, the amounts bet with the bookmaker and the amounts paid out by the bookmaker, it would seem appropriate that bookmakers financial statements be lodged on licence renewal every five years as recommended above.

With respect to the granting of permits this Office is of the view that the Liquor and Gambling Commissioner should continue to grant permits to bookmakers to accept bets because his Office is independent of the racing industry.

To allow the controlling authority, a racing club, or the SA Bookmakers' League to grant permits could lead to those bodies, or persons employed by those bodies, seeking to gain a financial advantage from a bookmaker relating to the issue of a permit. Perception of such practice is similarly an issue.

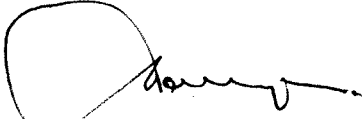
There have been allegations, although unsubstantiated, that the former Chief Executive of Racing Victoria Limited, may have received financial benefit when, in a previous position with RVL, he was responsible for issuing bookmaker permits.



A contrary view, although not supported by this Office, is that should the permit function be transferred to a body outside of Government, then consideration be given to bookmakers' unclaimed dividends being appropriated to that body.

Thank you for the opportunity to comment on the issues paper.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Denis Harvey', written over a horizontal line.

Denis Harvey
Director
22 April 2008