

10 December 2018

Keno Licensing Project
Office of Liquor, Gaming and Racing
Department of Justice and Regulation
GPO Box 4356
MELBOURNE VIC 3000

By Email: olgr.klp@justice.vic.gov.au

RE: ALNA Submission to Keno Discussion Paper.

The Australian Lottery and Newsagents (**ALNA**) is pleased to submit our response to the Keno Discussion Paper issued by the Office of Liquor, Gaming and Racing.

Australian Lottery and Newsagents Association

The Australian Lottery and Newsagents Association (ALNA), is a not-for-profit organisation and is the peak industry body that provides advocacy and support services to our members.

Members of the Australian Lottery and Newsagents Association (ALNA) represent the largest non-franchised family owned business sector in Australia. ALNA advocates for fairness for our members on a range of issues and we are guided by our members and board (*made up of newsagency and lottery agent owners*) as to what issues affect them.

Through our industry and government relationships, ALNA is able to present issues with the weight of an organisations that represents a significant part of the Australian small business sector.

ALNA is the only lottery and newsagent association with Australian Competition and Consumer Commission (ACCC) authorisation to represent its members nationally.

Changes to the legal requirements for the keno licensee:

ALNA submits that the sale and distribution of keno products in Victoria should be widened, from pubs and clubs, to include Newsagents currently selling lottery tickets, via Tabcorp's (previously Tatts Group) *Public Lotteries Licence* agreement.

Keno products are already sold in lottery agents in South Australia. Broadening the sale of keno products to Newsagents in Victoria will meet our customer's evolving needs, and be a valuable new revenue stream for the approximately **800+** newsagents in Victoria – many of whom are mum and dad small business operators.

Changes to harm minimisation:

Given ALNA's members have not been licensed to sell keno products in Victoria, it would be inappropriate for ALNA to comment on the specifics of harm minimisation for keno.

In a general sense however, ALNA and our members' commitment to upholding the responsible service of gambling products, such as lottery tickets, through member Newsagencies in Victoria, remains a steadfast focus of our Association and that of our members.

Changes to licensing arrangements for keno:

ALNA supports a change to the next keno licence that would see flexibility for the licensee to be able to offer keno via non-traditional hotel or wagering outlets, such as Newsagents, where the sale of lottery tickets already takes place.

Further, ALNA contends a genuine omni-channel partnership approach is required and this must be one that recognises, rewards and sustainably supports the role of retail partners as both important retail distributors, but also that recognises their role in capitalising the high value brand on streets and in shopping centres throughout Victoria.

Changes to revenue distribution arrangements under the keno licence:

ALNA supports an omni-channel approach that is underpinned by a fair revenue distribution model between all stakeholders.

Specifically, the model should act as an enabler of investment, not a burden.

Factors influencing the difference in the performance of the keno market between Victoria and other jurisdictions:

Nil

Conclusion:

ALNA contends that the keno licensing arrangement should be broadened to include Victorian Newsagents as a legitimate keno retailer.

Given there is already great synergy with the sale of Victorian lottery tickets, this extension would be appropriate and welcomed by our members and the community.

Kind regards

Ben

Ben Kearney

Chief Executive Officer

Australian Lottery and Newsagents Association

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