NGB

National Gambling Board

South Africa

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GAMBLING SECTOR PERFORMANCE IN SOUTH AFRICA

FY2020|21

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SUMMARY

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FOREWORD BY THE ACCOUNTING AUTHORITY

Ms Caroline Kongwa

In March 2020, the World Health Organisation declared COVID-19 a global pandemic, leading to stringent regulatory measures to contain the spread of the virus. As a sector reliant on social gatherings, the national lockdown restricted gambling activity for much of 2020. The resultant effect is reflected in the gambling statistics presented in this report, which show a drastic decline in gross gambling revenue relative to previous years. A notable shift in the industry occurred over this period, with the betting sector growing to outperform casinos sector.

The National Gambling Board (NGB) is pleased to share the latest gambling sector statistics for the financial year (FY) 2020/21 (1 April 2020 to 31 March 2021). The NGB monitors market conduct and market share in South Africa as mandated by the National Gambling Act (NGA), 2004 (Act 7 of 2004), Section 65(2)(e). The NGB gathers information from provincial licensing authorities (PLAs) which enables it to publish audited statistics on the sector's turnover, gross gambling revenue and taxes/levies collected each year.

We trust that our stakeholders and the public will find the content informative, useful and beneficial. The NGB would also like to extend its gratitude to all PLAs for submitting information and statistics as required, without which this report would not have been possible.

Ms Caroline Kongwa
Accounting Authority

ACKNOWLEDGEMENTS

All provincial licensing authorities (PLAs) are acknowledged for submitting audited information related to market conduct, market share and provincial gambling statistics per gambling mode, operator and province.

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CONTRIBUTORS

The following PLAs contributed to the compilation of this report by submitting audited provincial gambling statistics and information about market conduct:

- Eastern Cape Gambling Board
- Free State Gambling and Liquor Authority
- Gauteng Gambling Board
- KwaZulu-Natal Gaming and Betting Board
- Limpopo Gambling Board
- Mpumalanga Economic Regulator
- Northern Cape Gambling Board
- North West Gambling Board
- Western Cape Gambling and Racing Board

LIST OF ABBREVIATIONS/ACRONYMS

B-BBEE	Broad-Based Black Economic Empowerment
EBT	Electronic Bingo Terminal
EC	Eastern Cape
FS	Free State
FY	Financial Year
GGR	Gross Gambling Revenue
GP	Gauteng
KZN	KwaZulu-Natal
L	Limpopo
LPM	Limited Payout Machines
MP	Mpumalanga
N/A	Not Applicable
NC	Northern Cape
NCEMS	National Central Electronic Monitoring System
NGA	National Gambling Act, 2004 (Act 7 of 2004)
NGB	National Gambling Board
NW	North West
PLAs	Provincial Licensing Authorities
Qrt	Quarter
RTP	Return to Punter
the dtic	**The Department of Trade, Industry and Competition**
TO	Turnover
WC	Western Cape
YoY	Year-on-Year

EXPLANATORY NOTES

TERM	EXPLANATION
Broad-based black economic empowerment (B-BBEE)	Broad-based black economic empowerment is the sustainable economic empowerment of all black people – in particular women, workers, youth, people with disabilities and people living in rural areas – through diverse but integrated strategies including, but not limited to: a) increasing the number of black people who manage, own and control enterprises and productive assets b) facilitating ownership and management of enterprises and productive assets by communities, workers, co-operatives and other collective enterprises c) human resource and skills development, d) achieving equitable representation in all occupational categories and levels in the workforce e) preferential procurement including the promotion of local content procurement and f) investment in enterprises that are owned or managed by black people.
Bingo	Bingo means a game played in whole or in part by electronic means using cards or other devices that are divided into spaces, each of which bear a different number, picture or symbol and are arranged randomly such that each card or similar device contains a unique set of numbers, pictures or symbols. An operator calls or displays a series of numbers, pictures or symbols in random order and the players match each such number, picture or symbol on the card or device as it is called or displayed. The player who is first to match all the spaces on the card or device, or who matches a specified set of numbers, pictures or symbols on the card or device, wins a prize.
Bookmaker	A bookmaker, bookie or turf accountant is a person or organisation that takes bets on various events or contingencies such as horse racing, football, rugby, union or marriages, births, names, divorces and in extreme cases, deaths, at agreed upon odds (fixed odds). A bookmaker may be licensed to operate on or off-course; that is, at licensed premises other than a racecourse.
Casino	A casino is a facility that is licensed to house and accommodate certain types of licensed casino style slot machines and table gambling games.
Key employees (licensed)	Senior management of the licensee. If the licensee is a corporate body, every director or officer or equivalent of such corporate body; any individual who has the authority to hire or terminate supervisory casino personnel; any individual who has the authority to supervise or direct a shift of gaming or security activity; individuals who have the authority of responsibility to manage one of more departments or functions of the operations (accounting, credit and collections, cage, personnel, internal audit, security and surveillance); any individual who specifically represents the board as being important or necessary to the operation of the entity; all persons who individually or part of a group formulate management policy; any job positions or individual who upon notification by the gambling board is to be considered a key employee; anyone who the board considers whose functions and responsibilities place that employee in key employee status.
Other gaming employees (licensed)	Table inspector, dealer/croupier, cashier, counter, change attendant, host, floor attendant, security attendant, gaming machine attendant, gaming machine technician, surveillance personnel (lower ranking), gaming debt collection personnel, internal audit, accounting personnel, data processing, any other occupation upon notification by the board is concerned to be a gambling occupation for the purposes of the regulations.
Permanent employees (key and other)	Key (licensed) and other gaming (licensed) employees.
Temporary employees	Where the application for registration has been made to the board and the operation of the licensees' business will be prejudiced or disadvantaged by the delay. Such temporary licenses may be issued pending the outcome of the applicant's application for registration (in other words a temporary licence issued in anticipation of a permanent employee licence being issued).

TERM	EXPLANATION
Gambling machine/slot machine (used interchangeably)	A slot machine, informally known as a fruit machine, is a casino gambling machine with three or more reels, which spin when a button is pushed, or a handle is pulled (older mechanical types). These slot machines are also known as one-armed bandits because of the one lever on the side of the machine (the arm) and because of their ability to leave the gamer penniless (bandit). The machine pays off based on patterns of symbols visible on the front of the machine when it stops. Slot machines are the most popular gambling method in casinos and constitute about 80% of the average casino's income.
Gross gambling revenue (GGR)	Gross gambling revenue is defined as the rand value of the gross revenue of an operator in terms of turnover, less winnings paid to players.
Horse racing	Horse racing is the sport in which horses and their riders take part in races, typically with substantial betting on the outcome.
Licensed (all modes and outlets)	Licensed is when a person or company is in possession of a valid licence, registration card or certificate allowing him/them to offer approved gambling activities within licensed premises to over 18-year-old persons.
Limited payout machine (LPM)	Limited payout machine means a gambling machine outside of a casino, the playing of which offers limited stakes and prizes.
Return to player (RTP)	Return to player is an average amount of money returned to players achieved over a significant number of game plays and not each time the gambling machine is played (total amount returned to players/total amount wagered by players).
Route operator (RO)	Route operator is a juristic person licensed to own and operate limited payout machines, maintain and effect the collection of money and paying of taxes and levies in respect of all machines under its licence.
Site operator (SO)	Site operator is a natural or juristic person licensed to manage limited payout machines owned by a route operator on their licensed premises (also known as a site) and to make them available to be played by members of the public.
Table game	In casinos, the term 'table game' is used to distinguish games such as blackjack, craps, roulette and baccarat that are played on a table and operated by one or more live dealers like a croupier or poker dealer.
Taxes/levies	Gambling tax levied by and collected by provincial licensing authorities.
Totalisator/pari-mutuel betting (used interchangeably)	Totalisator is the name for the automated pool betting system, which runs pari-mutuel betting, calculating payoff odds, displaying them, and producing tickets based on incoming bets. Pari-mutuel betting is a betting system in which all bets of a particular type are placed together in a pool; taxes and the 'house stake' are removed, and payoff odds are calculated by sharing the net pool among all winning bets.
Turnover (TO)	Turnover is the rand value of money wagered. This includes 'recycling', which refers to amounts staked on more than one occasion. 'TO' in the fixed odds/bookmaking environment is, however, different from other forms of gambling in that the amount of money crossing the table is NOT seen as turnover. This is because the amount of money staked/wagered/bet on an event is returned to the player should the player win the wager/bet, so a true description of turnover in fixed odds/bookmaking parlance is money wagered minus the stakes wagered on winnings bets = fixed odds/bookmaking turnover.

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EXECUTIVE SUMMARY

The financial year FY2020/21 saw the gambling industry in South Africa come to its knees following the outbreak of a global pandemic that led to a complete halt of the industry in the first quarter of 2020. In the subsequent reopening of the economy, gambling facilities operated at reduced capacity due to extensive Covid-19 health and safety guidelines adopted by the industry, which had an adverse impact on revenue generation. Gross Gambling Revenue (GGR) was down more than 50% owing to the nationwide lockdown. Specifically, GGR for Q1 was R1.4 billion, a figure lower than previous year's GGR of R7.7 billion over the same period, representing a decline of 83%. Q2 saw an improvement in revenues as GGR generated increased to R6.1 billion, but it was still not up to the previous period's trends. The betting sector generated 55% of the total gambling revenue due to the fact that betting over the phone and on bookmakers' websites was permitted and as such, was the only form of safe gambling available for much of the quarter.

The gambling industry began to operate much more effectively in Q3 in spite of the country still having measures in place to curb the coronavirus. However, a deadly second wave of the pandemic emerged in the third quarter, which led to growing fears about interacting socially on the part of the public and a reluctance on the part of potential punters to take part in land-based gambling activities. The ban on alcohol also meant some gambling establishments attached to pubs, such as LPMs, had to be closed again. This undoubtedly had implications for the performance of the industry as GGR generated in Q3 amounted to R8 395 335 082, an increase from Q2 but still slightly below the previous year's (FY2019/20Q3) level of R8 603 545 919. Taxes and levies collected were hit the hardest in FY2020/21 due to the crumbling revenues, only amounting to R107 479 264 in 2020/21Q1 but recovering slightly to R548 171 297 in FY2020/21Q2 and R1 399 016 624 in Q3 although not yet to levels derived before the pandemic.

FY2020/21 as a whole saw the gambling industry lose more than R10 billion in gambling revenue, generating R23.3 billion in comparison to the previous year. Casino GGR declined the most, down by 50% from FY2019/20 owing to the effects of the Covid-19 pandemic. The share of casino revenue in total industry revenue breached the 50% mark for the first time in 10 years as casino operational positions were in the negative for the third time in three years.

The betting sector was the only sector to exhibit positive growth (21.2%) in revenue in FY2020/21 as this gambling mode was accessible online during the lockdown. The LPM and bingo industries saw a decline in revenues by over a third (-33.9% and -39.1% respectively) in FY2020/21 from FY2019/20.

Provincially, only Mpumalanga reported positive growth in revenue by roughly 100% while the rest of the provinces had negative growth in total GGR.

Historically, the composition of gambling revenue over the years has been dominated by casinos followed by betting, LPMs and bingo. However, the impact of the Covid-19 pandemic has changed the gambling landscape, with betting now holding a greater share of the market in terms of GGR.

The fiscus lost over R1 billion in taxes from the gambling industry in FY2020/21 relative to the previous year due to the impact of Covid-19.

SNAP SHOT OF THE GAMBLING INDUSTRY FY2019/20 and FY2020/21

VARIABLE	FY2019/20 MARKET CONDUCT – AS AT QUARTER 4 STATISTICS TOTAL ALL QUARTERS	FY2020/21 MARKET CONDUCT – AS AT QUARTER 4 STATISTICS TOTAL ALL QUARTERS	FY2020/21 Quarter 1	FY2020/21 Quarter 2	FY2020/21 Quarter 3	FY2020/21 Quarter 4
Number of operational casinos	39	38	38	38	38	38
Number of operational slots (casinos)	24 469	18 953	11 474	20 841	18 616	18 953
Number of operational table (casinos)	935	831	427	789	837	831
Number of operational gambling positions (casinos)	30 515	21 349	16 374	24 470	23 303	21 349
Number of operational totalisator outlets	368	328	227	309	362	328
Number of operational bookmakers	255	186	228	252	259	186
Number of operational bookmaker outlets	550	599	332	547	543	599
Number of operational limited payout machine (LPM) site operators	2 496	2 421	1 184	2 351	2 436	2 421
Number of active LPMs	13 989	13 914	6 580	13 279	12 931	13 914
Number of operational bingo outlets	56	65	24	59	62	65
Number of operational bingo positions	94 27	8 625	5 959	8 244	7 677	8 625
• Traditional	1 324	528	760	696	528	528
• Electronic Bingo Terminals	8 103	8 097	5 199	7 548	7 149	8 097
National gambling statistics: turnover	R445 279 244 624	R326 429 852 294	R19 797 443 262	R90 166 627 031	R110 338 963 470	R106 126 818 532
National gambling statistics: GGR generated	R32 167 248 599	R23 249 553 537	R1 381 472 629	R6 082 996 291	R8 396 762 260	R7 388 322 357
National gambling statistics: taxes/levies collected	R3 130 351 449	R2 049 107 892	R107 544 749	R545 623 964	R743 419 932	R652 519 246

MAXIMUM LICENCES PER GAMBLING MODE PER PROVINCE AS AS 31 MARCH 2021

MAXIMUM NUMBER OF LICENCES	EC	FS	GP	KZN	LP	MP	NW	NC	WC
Maximum number of casino licences	5	4	7	5	3	4	4 active 1 pending	3	5
Maximum number of route operator licences	2	2	5	4	No set maximum number	Unlimited	No set maximum number	2	2
Maximum number of bookmaker licences	Unlimited	No set maximum number	131	48	No set maximum number	Unlimited, subject to sufficient market demand and operational viability	No set maximum number	17	48 Unlimited
Maximum number of totalisator licences	Unlimited	No set maximum number	1	2	No set maximum number	Unlimited, subject to sufficient market demand and operational viability	No set maximum number	2	1 Unlimited
Maximum number of bingo licences	15	No roll out currently	11	22	No set maximum number	Unlimited, subject to sufficient market demand and operational viability	9	No roll out currently	No roll out currently Unlimited

CHAPTER 1

NATIONAL GAMBLING STATISTICS

1. Introduction

1.1. The financial year FY2020/21 saw the gambling industry in South Africa on its knees following the outbreak of a global pandemic that led to a complete shutdown of the industry in the first quarter of 2020. In the subsequent reopening of the economy, gambling facilities operated at reduced capacity due to extensive Covid-19 health and safety guidelines adopted by the industry that had an adverse impact on revenue generation.

1.2. The purpose of this section is to provide an overview of national gambling statistics (per gambling mode and province) based on provincial gambling statistics submitted by all provincial licensing authorities (PLAs) during the reporting periods as indicated.

2. Turnover per Gambling Mode and Province

2.1. A total amount of R326 429 852 294 was wagered in FY2020/21, a fall of 27.8% from the previous financial year FY2019/20 (R451 899 133 881) due to the ripple effects of the Covid-19 pandemic on the gambling industry. Due to a nationwide total shutdown in Q1 of FY2020/21 and subsequent restrictions on public gatherings, less money was wagered in the gambling industry compared with the last five financial years. Casinos accounted for the highest turnover (TO) at 48.6% in comparison with all other gambling modes. Gauteng accounted for the highest amount of TO in respect of all gambling modes, compared to other provinces. The TO per gambling mode and province is reflected in figures 1 and 2.

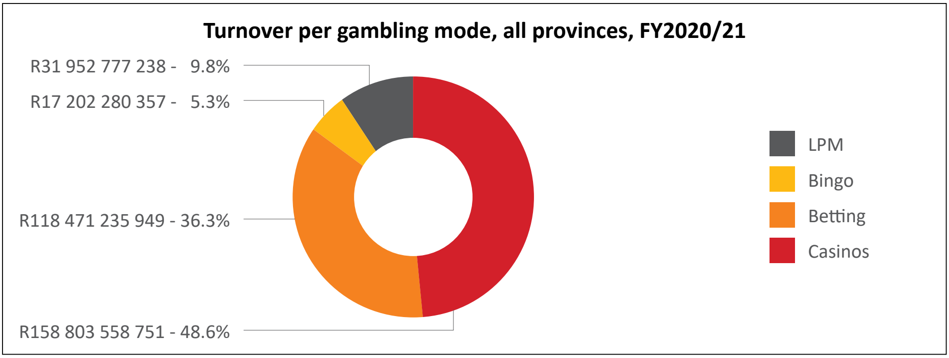


Figure 1: Turnover per gambling mode, all provinces, FY2020/21

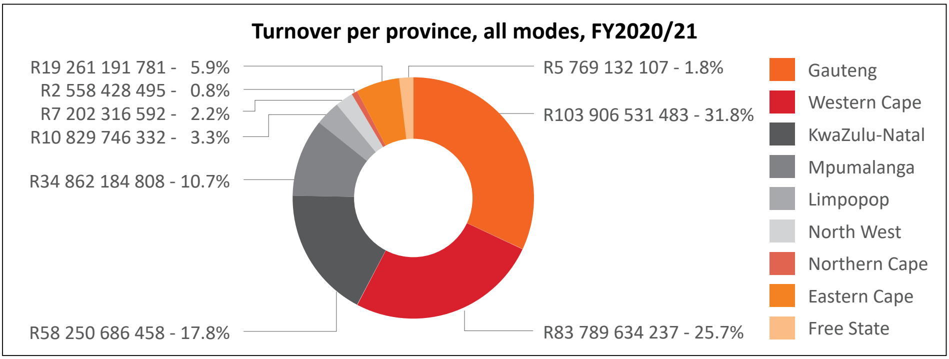


Figure 2: Turnover per province, all modes, FY2020/21

3. Gross Gambling Revenue per Gambling Mode and Province

3.1. Gross gambling revenue (GGR) increased by 3.8% from R26 billion in FY2015/16 to R27 billion in FY2016/17; by 6.7% to R28.8 billion in FY2017/18; by 7.0% to R 30.8 billion in FY2018/19; and by 6.1% to R32 651 969 283 in FY2019/20. In FY2020/21, however, GGR decreased by 28.8% to R23 249 553 537. During FY2020/21, betting accounted for the highest GGR generated, being 45.6% as compared to other gambling modes. Compared to all other provinces, Gauteng at a 35% share, accounted for the highest amount of GGR generated. The GGR per gambling mode and province is reflected in figures 3 and 4.

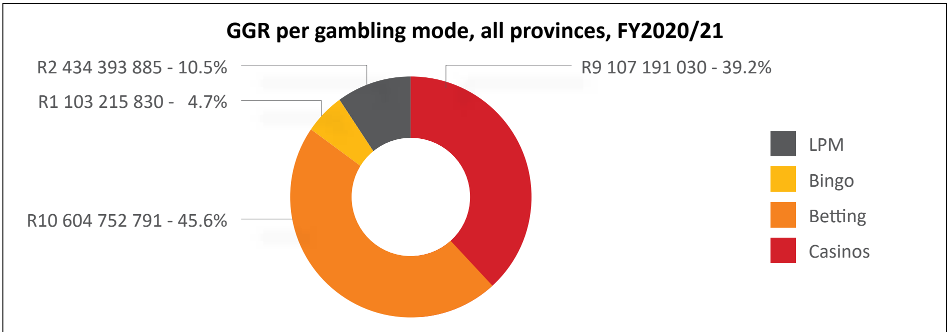


Figure 3: GGR per gambling mode, all provinces, FY2020/21

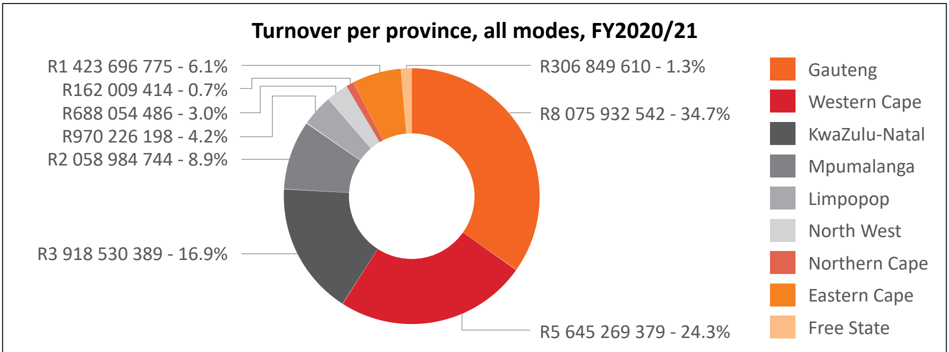


Figure 4: GGR per province, all modes, FY2020/21

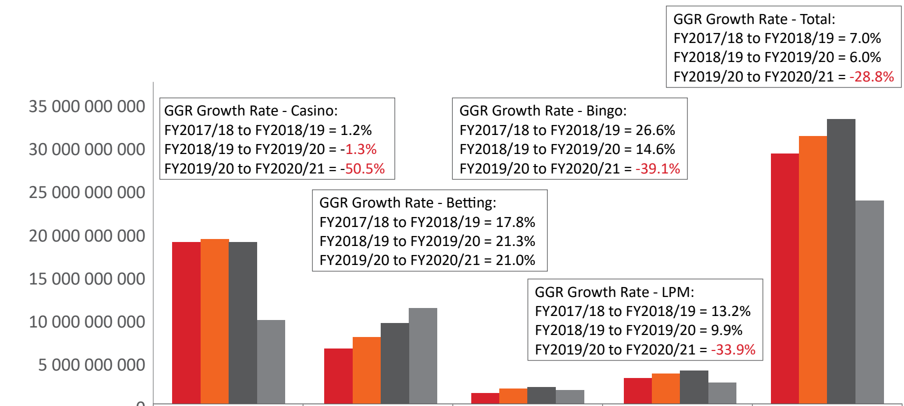
3.2. Analysis of GGR and gambling positions per gambling mode during the period FY2017/18 to FY2020/21 reflected the following growth and trends as shown in figures 5, 6 and 7:

3.2.1. GGR overall fell by almost a third in FY2020/21 compared to the previous financial year as all modes – except betting – recorded negative growth. Casino GGR specifically fell by more than 50%, with the LPM and bingo sectors losing over a third in revenues compared with FY2019/20 due to the effects of the global Covid-19 pandemic. Although the FY2020/21 had declines in operational positions in the casino, LPM and bingo sectors, the operational positions in the casino sector have, since FY2018/19, recorded negative growth for three consecutive financial years. The number of operational EBTs in the bingo sector also fell in FY2020/21 after having followed an upward trajectory since FY2012/13. Traditional bingo fell further and became non-existent in two more provinces, meaning a total of four out of the six provinces offering bingo no longer have operational traditional bingo.

3.2.2. Positive growth in GGR (21.0%) was recorded in the betting industry due to its uninterrupted accessibility during the year despite the Covid-19 restrictions that hampered access to other modes. Betting is the only mode of gambling that can be undertaken online in South Africa.

3.2.3. All provinces except Mpumalanga reported negative growth in revenues between FY2019/20 and FY202/21. The hardest hit province was North West (-49.2%) followed by the Free State (-48.9%). Mpumalanga grew 13.4% – mainly due to a massive surge in betting GGR in FY2020/21 in spite of the effects of the Covid-19 pandemic.

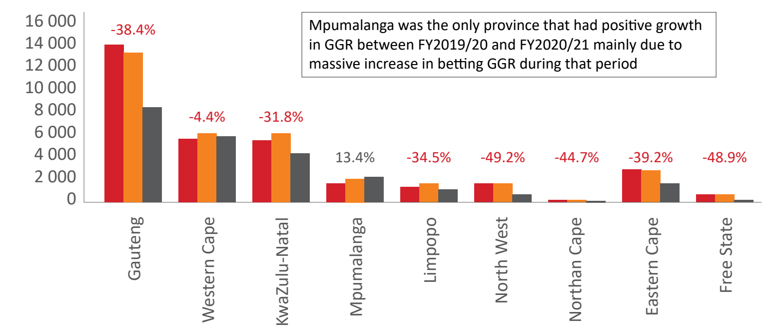
Growth in GGR (all modes): FY2017/18 – FY2020/21



	GGR Casino	GGR Betting	GGR Bingo	GGR LPM	Total
GGR, FY2017/18	R12 417 094 967	R6 136 832 908	R1 248 509 057	R2 960 822 948	R28 763 259 881
GGR, FY2018/19	R18 632 408 686	R7 227 082 554	R1 580 744 888	R3 350 530 532	R30 790 766 660
GGR, FY2019/20	R18 394 077 253	R8 764 027 638	R1 810 774 980	R3 681 852 665	R32 650 732 535
GGR, FY2020/21	R9 107 191 030	R10 604 752 791	R1 103 215 830	R2 434 393 885	R23 249 553 537

Figure 5: Growth in GGR, all modes (FY2018/19 – FY2020/21)

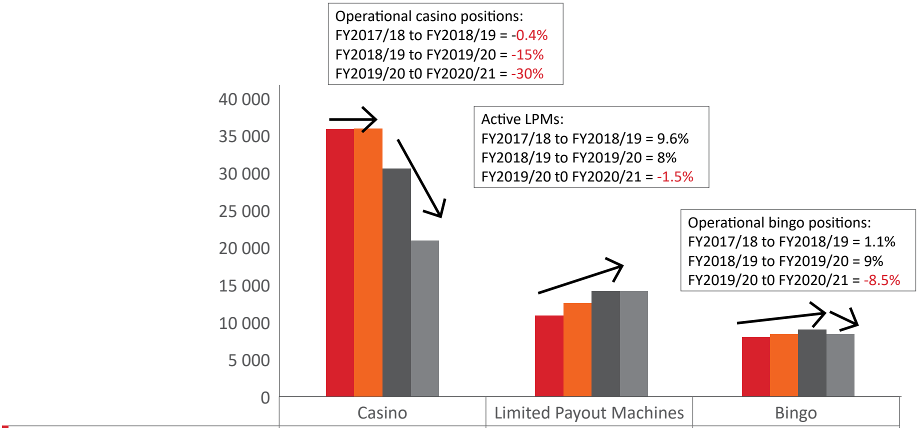
Growth rate of GGR per province per province (FY2018/19 – FY2020/21)



	Gauteng	Western Cape	KwaZulu-Natal	Mpumalanga	Limpopo	North West	Northan Cape	Eastern Cape	Free State
GGR, FY2018/19	R14 061	R5 429	R5 296	R1 484	R1 314	R1 393	R282	R2 356	R630
GGR, FY2019/20	R13 112	R5 905	R5 748	R1 815	R1 480	R1 353	R293	R2 343	R601
GGR, FY2020/21	R8 076	R5 645	R3 919	R2 059	R970	R688	R162	R1 424	R307

Figure 6: Growth rate of GGR per province (FY2018/19 – FY2020/21, (R millions))

Number of operational gambling positions in the casino, LPM & bingo sectors: FY2017/18 – FY2020/21



	Casino	Limited Payout Machines	Bingo
Operational Positions, FY2017/18	35 929	11 896	8 520
Operational Positions, FY2018/19	35 768	13 034	8610
Operational Positions, FY2019/20	30 515	14 130	9427
Operational Positions, FY2020/21	21 349	13 914	8 625

Figure 7: Number of gambling positions in the casino, LPM & bingo sectors, FY2017/18 – FY2020/21

3.3. As at 31 March 2021, GGR from all modes of gambling totalled R23 249 553 537 (all quarters). Of this total, betting accounted for the highest share (45.6%) followed by casino GGR at 39.2%. LPM GGR accounted for 10.5% of the market while bingo had the least market share with 4.7%. Between FY2009/10 and FY2020/21, the trend in market share showed casino GGR dropped from 84.4% to 39.2%, while the share of gambling revenues from other modes (betting, LPM and bingo) increased as shown in figure 8. Betting increased in market share to surpass the casino sector from 26.8% to 45.6% between FY2019/20 to FY2020/21. The share of LPM in total GGR decreased from 11.3% to 10.5%, and bingo from 5.5% to 4.7% over the past financial year.

Trend in share of total GGR, comparison all modes (FY2009/10 – FY2020/21)

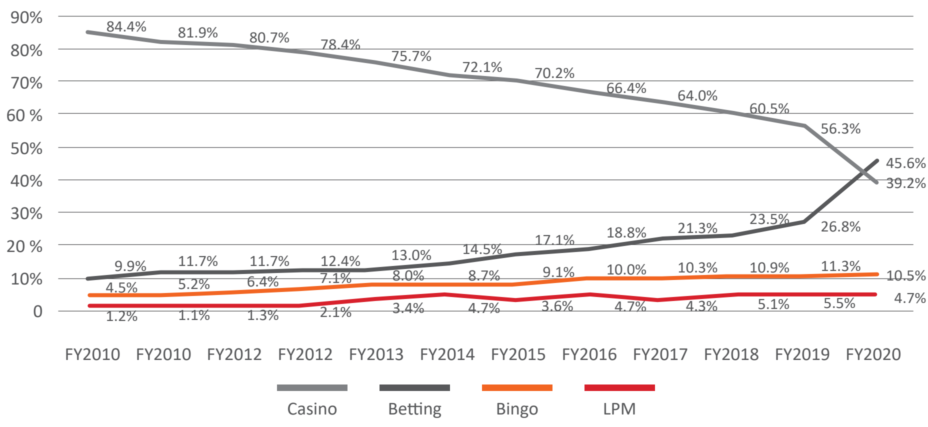


Figure 8: Trend in share of total GGR, comparison of all modes (FY2009/10 – FY2020/21)

4. Taxes/Levies Contribution per Gambling Mode and Province

4.1. A total amount of R2 049 107 892 in taxes/levies was collected during FY2020/21. At 42.3%, casinos contributed the highest amount of taxes/levies in comparison with other gambling modes. Gauteng (35%) accounted for the highest amount of taxes/levies relative to the other provinces. The collection of taxes/levies decreased by 1% from R2.8 billion in FY2015/16 to R2.7 billion in FY2016/17, increased by 5.7% to R2.9 billion in FY2017/18, by 6.8% to R3.1 billion in FY2018/19, by 3.2% to R3.2 billion in FY2019/20 and decreased by more than a third (36.1%) to R2 billion in FY2020/21. Taxes/levies collected per gambling mode and province are reflected in figures 9 and 10.

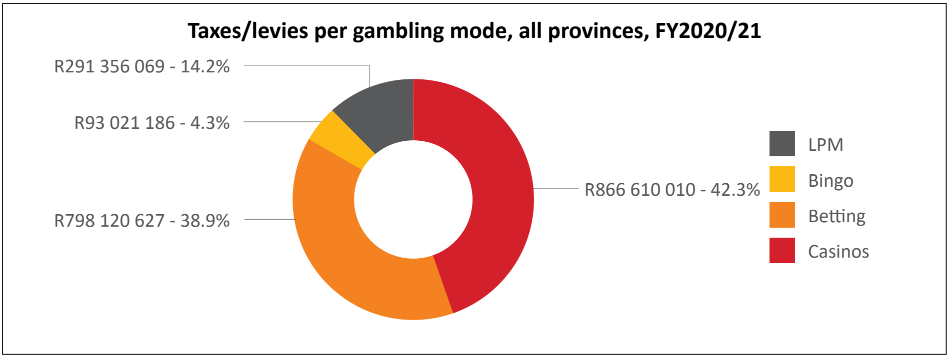


Figure 9: Taxes/levies per gambling mode, all provinces, FY2020/21

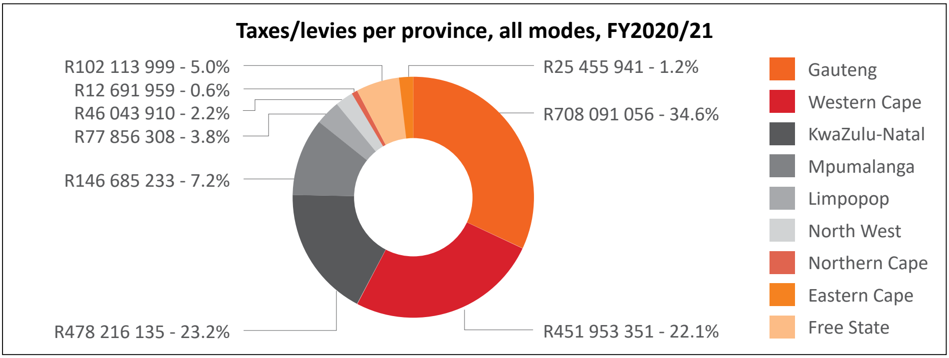


Figure 10: Taxes/levies per province, all modes, FY2020/21

CHAPTER 2

CASINO SECTOR

1. Market Conduct

1.1. By the end of the financial year FY2020/21, a total number of 38 casinos (out of a maximum of 41 licences) were operational in South Africa. This follows the closure of Naledi Casino in the Free State owned by Sun International due to the effects of the Covid-19 pandemic.

1.2. Of the total casino market, the majority of the casinos are situated in Gauteng which has seven (18%) while the Western Cape, KwaZulu-Natal and the Eastern Cape each host five casinos (13%) as reflected in figure 11.

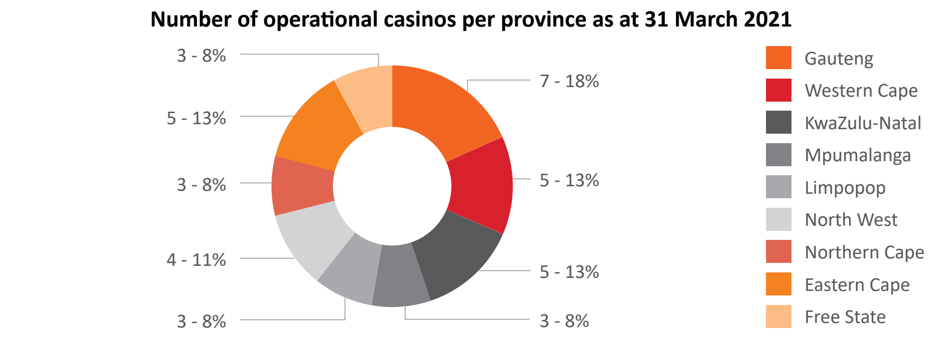


Figure 11: Number of operational casinos per province as at 31 March 2021

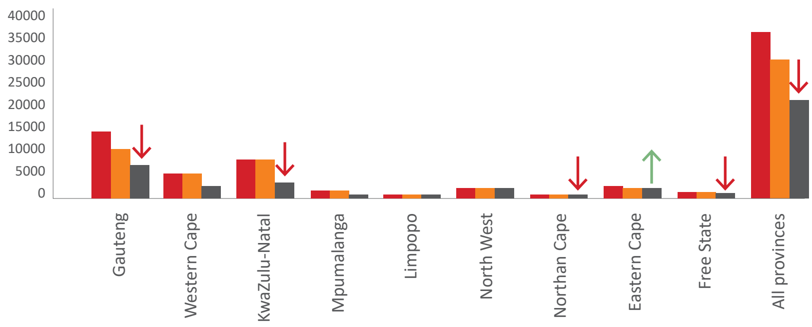
1.3. Tsogo Sun Holdings/Hosken Consolidated Investments is the controlling shareholder of most of the operational casinos (14), followed by Sun International (12) and Peermont Global (8). London Clubs International, Northern Cape Casino Consultants, Billion Group and African Pioneer Gaming each own one casino.

1.4. Table 1 below reports the number of operational slots, tables and gambling positions per province as at 31 March 2021. Gauteng accounted for the highest number of licensed operational slots in casinos (5 501) followed by KwaZulu-Natal (3 839) and the Western Cape (2 633) out of the total number of 18 953 slots. The Northern Cape (2.5%), Limpopo (3.7%) and the Free State (4.2%) operate the fewest number slots. This is a decline from the total number of operational slots in FY2019/20 of 24 469. The majority of operational tables are also located in Gauteng (33%), with KwaZulu-Natal (18.3%) and the Eastern Cape (13.2%) also holding relatively sizable shares. Overall, the number of operational tables fell by 11.1% at the end of FY2020/21. The number of operational gambling positions is calculated as the number of slots plus the average number of positions that each table represents at a casino. The number of operational positions is reflected in table 1.

PROVINCE	OPERATIONAL SLOTS		OPERATIONAL TABLES		OPERATIONAL POSITIONS	
	NUMBER	%	NUMBER	%	NUMBER	%
Gauteng	5 501	29.0%	274	33.0%	5 775	27.1%
Western Cape	2 633	13.9%	77	9.3%	2 710	12.7%
KwaZulu-Natal	3 839	20.3%	152	18.3%	3 991	18.7%
Mpumalanga	1 137	6.0%	56	6.7%	1 193	5.6%
Limpopo	710	3.7%	37	4.5%	932	4.4%
North West	1 529	8.1%	77	9.3%	2 501	11.7%
Northern Cape	483	2.5%	11	1.3%	549	2.6%
Eastern Cape	2 327	12.3%	110	13.2%	2 437	11.4%
Free State	794	4.2%	37	4.5%	1 261	5.9%
Total	**18 953**	**100.0%**	**831**	**100.0%**	**21 349**	**100.0%**

Table 1: Number of operational slots, operational tables and operational positions in casinos as at 31 March 2021

Number of operational positions in casinos per province, FY2018/19 – FY2020/21 (as at 31 March 2021)



Operational Positions, FY2018/19, Qrt 4	14 492	4 478	6 414	1 939	939	2 501	735	2 848	1 422	35 768
Operational Positions, FY2019/20, Qrt 4	9 729	4 478	6 454	1 921	939	2501	729	2 403	1 361	30 515
Operational Positions, FY2020/21, Qrt 4	5 775	2 710	3 991	1 193	932	2501	549	2 437	1 261	21 349

Figure 12: Number of operational positions in casinos per province, FY2018/19 – FY2020/21(as at 31 March 2021)

2. Turnover Per Province in Casinos

2.1. The total rand value of money wagered in casinos in FY2020/21 was R158 803 558 751. This amount represents 48.7% of the total turnover (money wagered) in all gambling modes. The effects of the Covid-19 outbreak affected the performance and growth of the South African casino industry due to the closure of operations following a nationwide lockdown in FY2020/21. In comparison with the previous year's turnover (R292 281 542 623), this is a drop of 46%.

2.2. As at 31 March 2021, Gauteng had the highest number of casinos compared to other provinces resulting in the highest amount of money wagered during FY2020/21 (45.4%). This is followed by money wagered in casinos in KwaZulu-Natal (21.5%) and the Western Cape (15.0%) as reflected in figure 13.

Casino turnover per province, FY2020/21

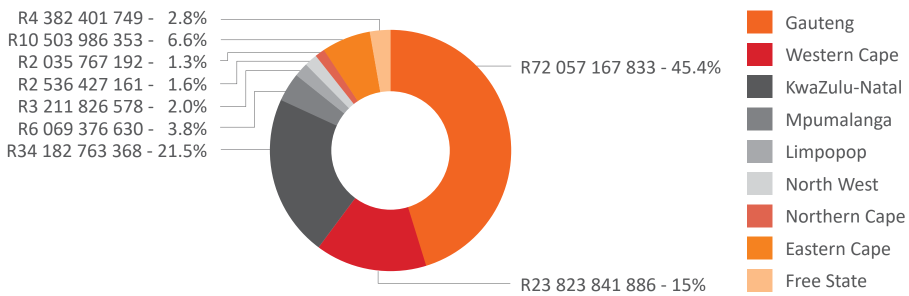


Figure 13: Casino turnover per province, FY2020/21

3. Gross Gambling Revenue Generated in the Casino Sector per Province

3.1. The total rand value of GGR generated in casinos during FY2020/21 was R9 107 191 030, a 50.5% decline from FY2019/20 which was R18 394 077 253, due to the Covid-19 pandemic which left the international community, the domestic economy and the gambling industry in turmoil as countries instituted stringent measures to contain the spread of the virus. The share of casino GGR represents 39.2% of the total amount of GGR generated by all gambling modes. The casino sector was already facing slow growth in revenue in the last financial years compared with other modes but the effects of the global pandemic mainly social distancing, curfew, limits on numbers at public gatherings, travel restrictions and complete seizure of all land-based gambling operations had a devastaing impact on the sector. GGR generated by the casino sector decreased by 1.8% from FY2015/16 (R18 236 685 695) to FY2016/17 (R17 900 747 071), increased by 2.9% to R18 417 094 967 in FY2017/18, and increased by only 1.2% to R18 632 408 686 in FY2018/19 but declined by 1.3% in FY2019/20 and further declined by 50.5% in FY2020/21.

3.2. Gauteng has the highest number of casinos compared to other provinces, resulting in the highest amount of GGR generated during FY2020/21 in these gambling venues (45.6%), followed by KwaZulu-Natal (20.3%) and Western Cape (14.6%) as reflected in figure 14.

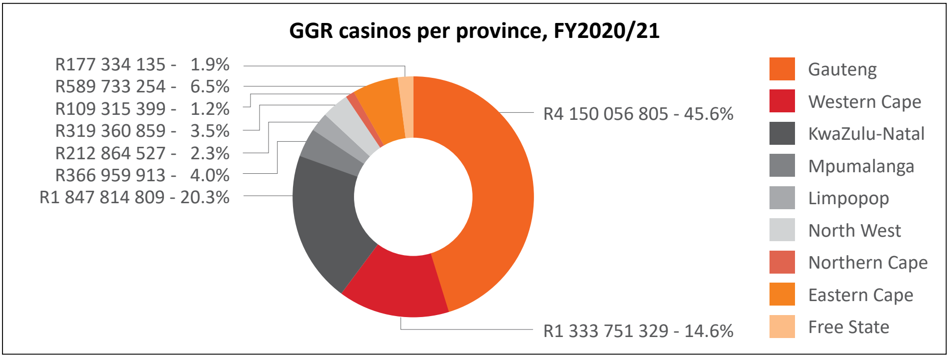


Figure 14: GGR casinos per province, FY2020/21

3.3. Figure 15 compares GGR for each quarter in FY2020/21 relative to FY2019/20 showing that GGR was significantly lower in FY2020/21.

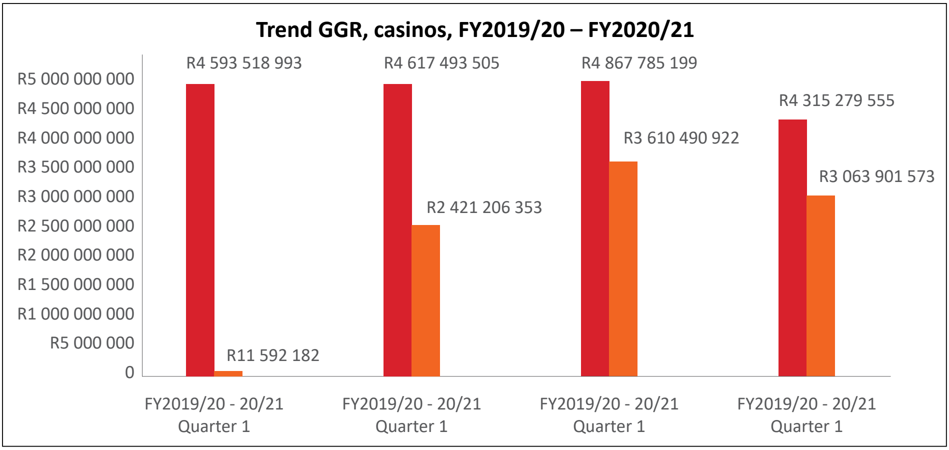


Figure 15: Trend in GGR, casinos, FY2019/20- 2020/21

4. Taxes/Levies collected by PLAs from the Casino Sector per Province

4.1. The total rand value of taxes/levies collected by PLAs from the casino sector in FY2020/21 was R866 610 010, a decrease by 54.0% from the previous financial year FY2019/20 (R1 883 771 356) owing to the Covid-19 pandemic. This represents 42.4% of the total amount of taxes/levies collected from all gambling modes (inclusive of betting on horse racing and sport, LPMs and bingo). A decrease by 7.3% was recorded in taxes/levies collected from FY2015/16 (R1 969 759 247) to FY2016/17 (R1 826 714 702), an increase by 2.8% between FY2016/17 and FY2017/18 (R1 877 683 303), and an increase by 2.7% to R1 927 643 751 in FY2018/19. A decrease was however recorded between FY2018/19 and FY2019/20 by 2.3% and a further decline in FY2020/21 by 54%.

4.2. As at 31 March 2021, Gauteng accounted for the highest number of casinos in comparison with other provinces resulting in the highest amount of taxes/levies collected from these gambling venues (43.1%), followed by KwaZulu-Natal (24.3%) and the Western Cape (18.3%) as reflected in figure 16.

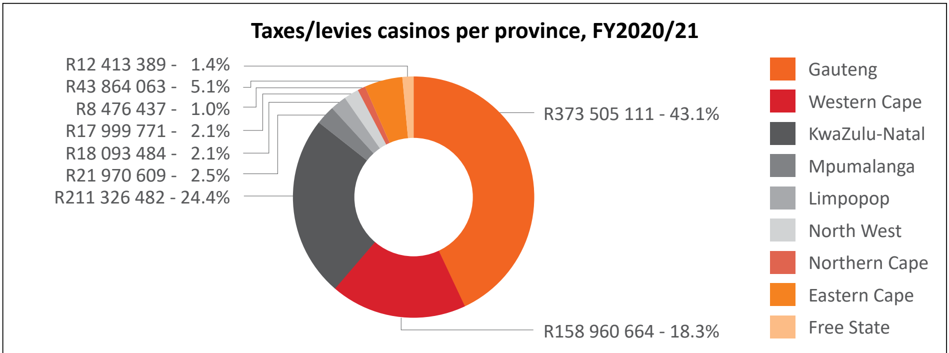


Figure 16: Taxes / levies casinos per province, FY2020/21

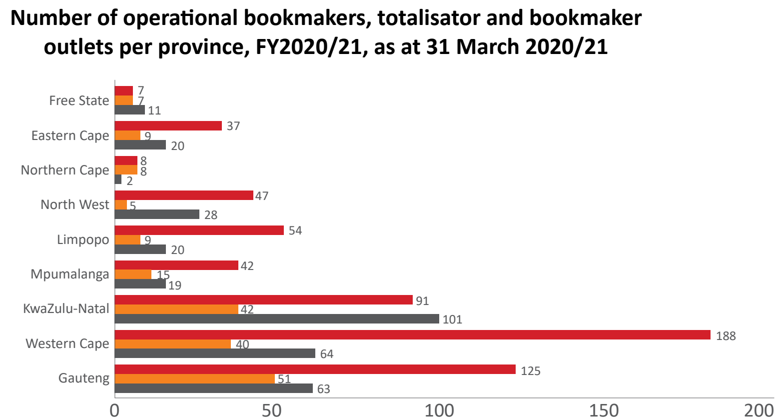
CHAPTER 3

BETTING ON HORSE RACING AND THE SPORT SECTOR

1. Market Conduct

1.1. Gold Circle is a totalisator operator in KwaZulu-Natal while Phumelela operates in Gauteng, Mpumalanga, Limpopo, North West, Northern Cape, Eastern Cape and the Free State. Kenilworth Racing (totalisator) operates in the Western Cape and is managed by Phumelela on behalf of the Kenilworth Racing Trust. Trotco (Pty) Ltd t/a Ithotho is licensed in KwaZulu-Natal as a totalisator and a racecourse operator. Telebet call centres are located in Gauteng and the Eastern Cape. PowerBet Gaming is a totalisator operating in Mpumalanga. Licensed bookmakers are located in all provinces in the Republic. Bets can be placed on horse racing and sport (on and off course), as well as any other legal contingency.

1.2. Figure 17 shows the number of operational totalisator and bookmaker outlets as at 31 March 2021. KwaZulu-Natal accounted for the highest number of licensed operational totalisator outlets (101) followed by the Western Cape (64) and Gauteng (63). The highest number of licensed operational bookmaker outlets were situated in the Western Cape (188), followed by Gauteng (125) and KwaZulu-Natal (91).



	GP	WC	KZN	MP	LP	NW	NC	EC	FS
Operational bookamker outlets	125	188	91	42	54	47	8	37	7
Operational bookmakers	51	40	42	15	9	5	8	9	7
Operational totalisator outlets	63	64	101	19	20	28	2	20	11

Figure 17: Number of licensed operational bookmakers, totalisator and bookmaker outlets, FY2020/21, as at 31 March 2021

2. Turnover in the Betting Sector (Totalisators and Bookmakers) Per Province

2.1. The total rand value of money wagered in the betting on horse racing and sport sector during FY2020/21 was R118 471 235 949, an increase of 56.5% from FY2019/20 (R75 700 192 595), in spite of the effects of the global pandemic. This amount represents 36.3% of all turnover (money wagered) across all gambling modes. This is mainly attributed to the continued accessiblity of the gambling mode on online platforms despite the complete shutdown in the land-based fraternity.

2.2. As at 31 March 2021, the Western Cape (43.9%) accounted for the highest amounts of money wagered on the horse racing and sport sector compared to Gauteng (19.0%) and KwaZulu-Natal (11.7%), as reflected in figure 18.

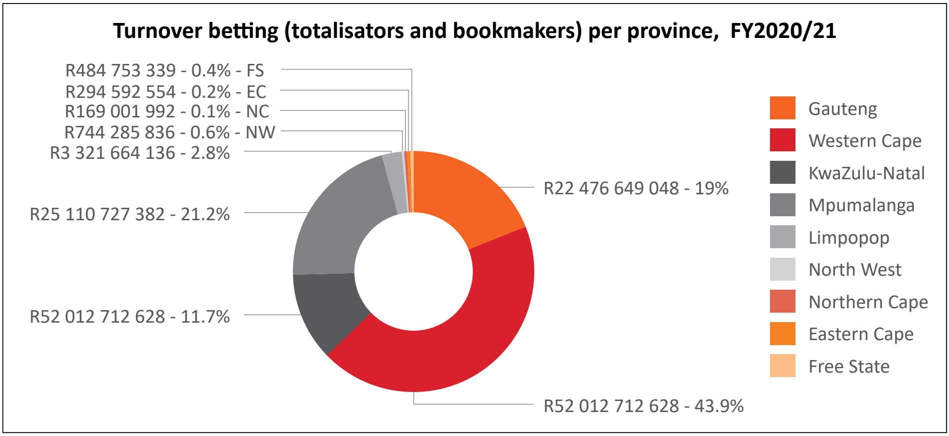


Figure 18: Turnover betting (totalisators and bookmakers) per province, FY2020/21

3. Gross Gambling Revenue generated in the Betting Sector (Totalisators and Bookmakers) per Province

3.1. The total rand value of GGR generated in the betting on horse racing and sport sector during FY2020/21 was R10 604 752 791, a 21.0% increase from FY2019/20 (R8 764 027 638). This amount represents 45.6%, the largest share of total GGR including the casino, LPM and bingo sectors.

3.2. As at 31 March 2021, the Western Cape accounted for the highest GGR generated in FY2020/21 followed by Gauteng as reflected in figure 19.

3.3. GGR generated in the betting industry increased by 14.3% from R4 448 765 756 in FY2015/16 to R5 085 630 664 in FY2016/17, by 20.7% to R6 136 832 908 in FY2017/18, and by 17.8% to R7 227 082 554 in FY2018/19. An increase of 21.3% was recorded between FY2018/19 and FY2019/20, while in FY2020/21, betting GGR increased by 21.0%.

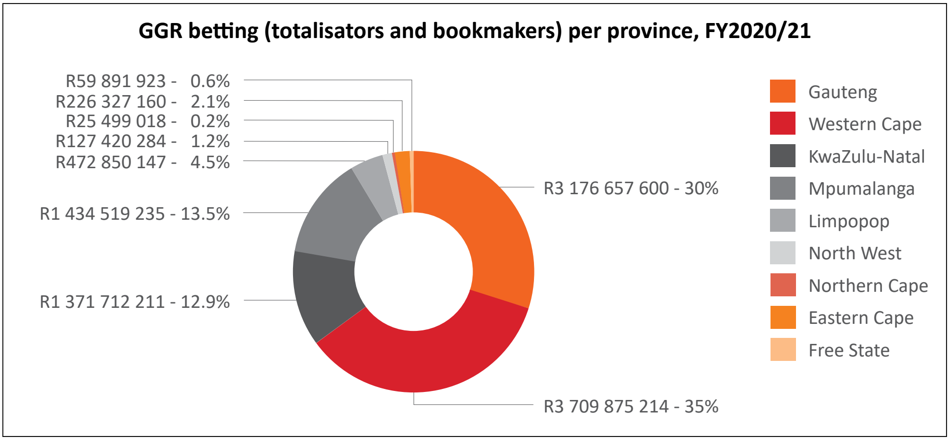


Figure 19: GGR betting (totalisators and bookmakers) per province, FY2020/21

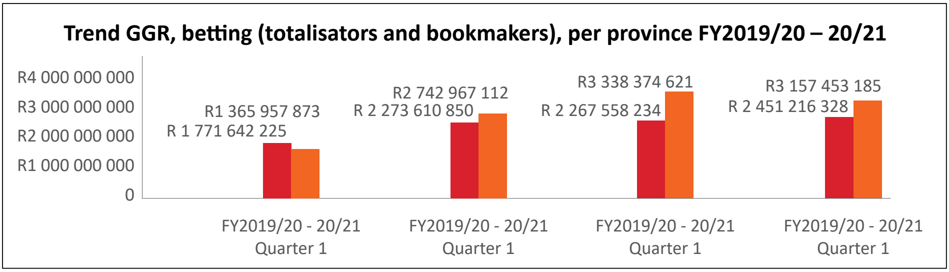
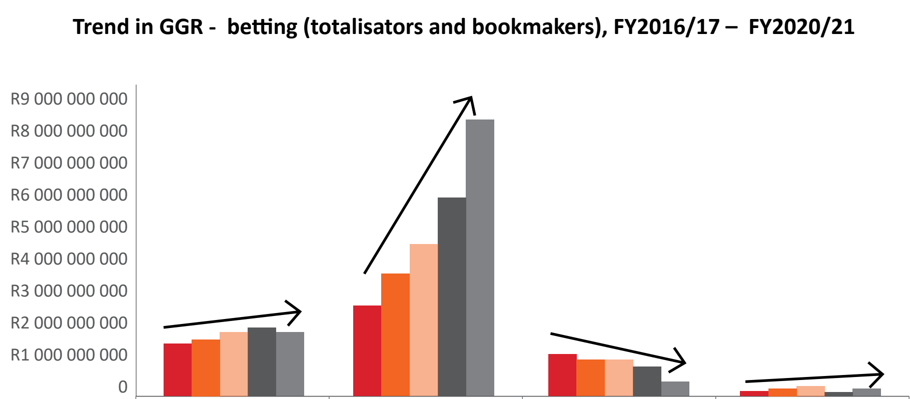


Figure 20: Trend in GGR, betting (totalisators and bookmakers), FY2019/20-20/21

3.5. It is important to note that for the Eastern Cape, the betting on horse racing figures are inclusive of betting on sport. Unfortunately no disaggregated data is available, therefore these values should be read with due caution.

3.6. Figure 21 depicts trends in GGR between FY2016/17 and FY2020/21 for bookmakers and totalisators seperately. Overall, bookmakers showed an upward trend in GGR while totalisators' GGR fell for horse racing and rose marginally for sports betting.



	Bookmakers, Horse Racing	Bookmakers, Sports betting	Totalisators, Horse Racing	Totalisators, Sports Betting
FY2016/17	R1 145 152 334	R2 632 669 149	R1 026 450 253	R281 358 927
FY2017/18	R1 289 865 606	R3 563 907 799	R947 647 300	R335 385 203
FY2018/19	R1 670 139 075	R4 317 057 494	R941 913 021	R313 592 486
FY2019/20	R1 709 594 514	R5 981 461 167	R803 813 609	R269 158 347
FY2020/21	R1 682 465 082	R8 174 191 238	R426 303 791	R321 792 680

Figure 21: Trend in GGR, betting (totalisators and bookmakers) per province, FY2016/17- FY2020/21

4. Taxes/Levies Collected by PLAs from the Betting Sector (Totalisators and Bookmakers) per Province

4.1. The total rand value of taxes/levies collected by PLAs from the betting on horse racing and sport sector during FY2020/21 was R798 120 627 an increase of 19.1% from FY2019/20 (R669 723 254). This amount represents 38.9% of the total amount of taxes/levies collected from all gambling modes (inclusive of casinos, LPMs and bingo). The collection of taxes/levies increased by 8.5% from R 396 775 739 in FY2015/16 to R430 497 110 in FY2016/17, increased by 16.1% to R499 817 351 in FY2017/18, increased by 11.4% to R556 709 987 in FY2018/19 and increased by 20.3% in FY2019/20, whilst in FY2020/21 it increased by 19.1%.

4.2. As at 31 March 2021, Gauteng accounted for the highest amount of betting taxes collected in the betting industry (29%), followed by Western Cape (29.2%) and KwaZulu-Natal (22.1%) as shown in figure 22 below.

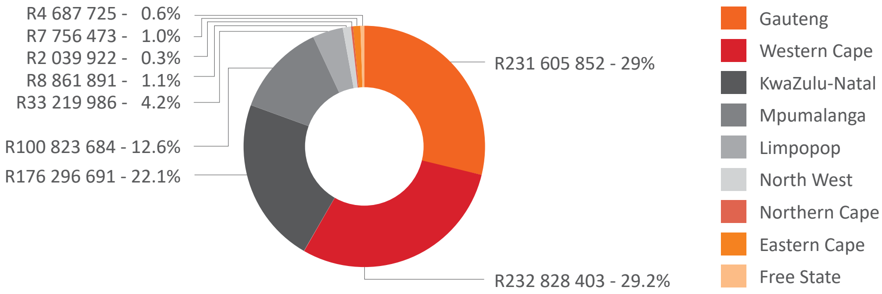
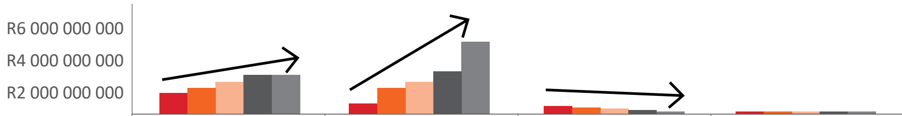


Figure 22: Betting (totalisators and bookmakers) taxes/levies, per province, FY2020/21

Trend in taxes/levies collected relevant to betting (totalisators and bookmakers), FY2016/17 – FY2020/21



	Bookmakers, Horse Racing	Bookmakers, Sports betting	Totalisators, Horse Racing	Totalisators, Sports Betting
FY2016/17	R191 457 705	R149 433 682	R69 202 264	R20 403 459
FY2017/18	R207 019 752	R205 840 847	R66 260 932	R20 695 820
FY2018/19	R234 294 532	R242 062 102	R63 114 445	R19 163 213
FY2019/20	R255 643 674	R342 735 894	R54 123 488	R17 218 199
FY2020/21	R254 604 053	R493 087 476	R29 106 630	R23 708 890

Figure 23: Trend in taxes/levies collected relevant to betting (totalisators and bookmakers), FY2016/17 – FY2020/21

CHAPTER 4

LIMITED PAYOUT MACHINE SECTOR

1. Market Conduct

1.1. The main role players in the LPM sector can be defined in three specific categories, namely route and independent operators, site operators and the National Central Electronic Monitoring System (NCEMS). Route/ independent operators are companies that are licensed to own, manage and operate LPMs throughout the country. Site operators are privately-owned hotels, pubs or eating establishments, totalisator or bookmaker outlets which may be situated throughout the country. NCEMS is a centralised LPM monitoring and evaluation system operating on a long-term contract basis by Route Monitoring.

1.2. The Covid-19 pandemic resulted in the closure of all land-based gambling establishments including the LPM industry. Some sites were closed due to the primary business being susceptible to the ban on the sale of alcohol as a preventative measure for the spread of the virus. The highest number of operational site operators in FY2020/21 as at 31 March 2021 were situated in KwaZulu-Natal (544), followed by 498 in Gauteng and 448 in Western Cape. Provinces with relatively few operational site operators were the North West (139), Free State (152), the Eastern Cape (153) and the Northern Cape (47). Mpumalanga and Limpopo had 224 and 216 site operators respectively.

1.3. KwaZulu-Natal had the highest number of licensed active LPMs in FY2020/21 as at 31 March 2021, being 2940, followed by Gauteng that accounted for 2609 and the Western Cape (2078), as reflected in figure 24. The number of licensed active LPMs increased by 2.1% from 11 502 (FY2016/17) to 11 744 in FY2017/18, and increased by 11.0% to 13 034 in FY2018/19 as a result of increases in almost all provinces except Northern and Eastern Cape. This further increased by 8.4% to 14130 in FY2019/20 but decreased to 13 914 in FY2020/21 as reflected in figure 25.

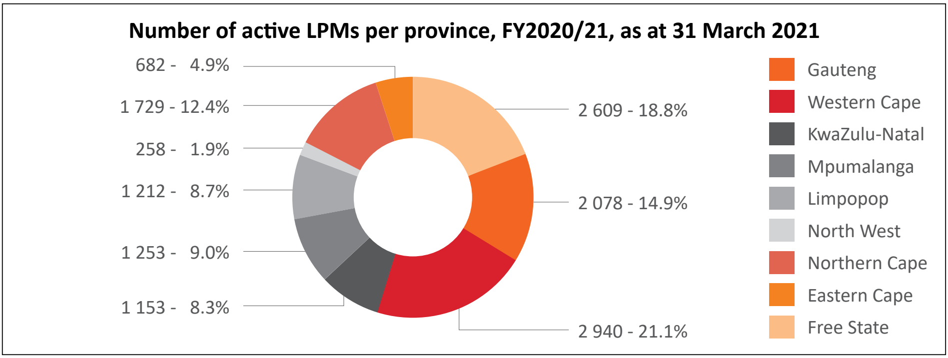
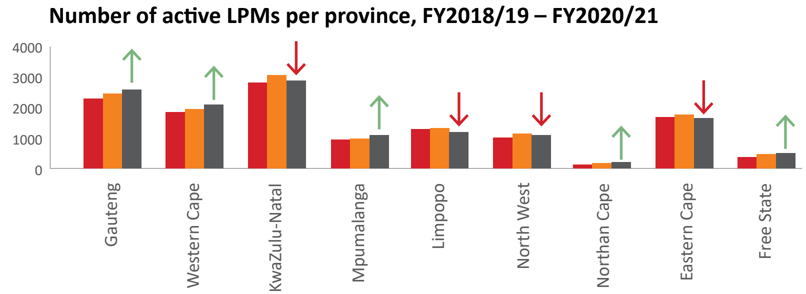


Figure 24: Number of active LPMs per province, FY2020/21, as at 31 March 2021



	Gauteng	Western Cape	KwaZulu-Natal	Mpumalanga	Limpopo	North West	Northan Cape	Eastern Cape	Free State
Active LPMs, FY2018/19, Qrt 4	2 325	1 957	2 896	1 016	1 320	1 098	152	1 776	494
Active LPMs, FY2019/20, Qrt 4	2 504	2 029	3 075	1 110	1 350	1 236	250	1 861	670
Active LPMs, FY2020/21, Qrt 4	2 609	2 078	2 940	1 153	1 253	1 212	258	1 729	682

Figure 25: Number of licensed active LPMs per province, FY2018/19 to FY2020/21

2. Turnover in the LPM Sector per Province

2.1. The total rand value of money wagered in the LPM sector during FY2020/21 was R31 952 777 238, a fall by over a third (34.5%) from the previous financial year FY2019/20 (R48 765 701 602). This amount represents 9.8% of turnover (money wagered) over all gambling modes.

2.2. Although KwaZulu-Natal accounted for the highest number of licensed active LPMs (2940) and operational site operators (544) in FY2020/21, the highest amounts of money wagered in the LPM sector were wagered in the Western Cape (R7.95 billion or 24.9% of TO). This is followed by money wagered at LPM outlets in KwaZulu-Natal (R7.61 billion, 23.8%) and Gauteng (R5.45 billion, 17.1%) as reflected in figure 26.

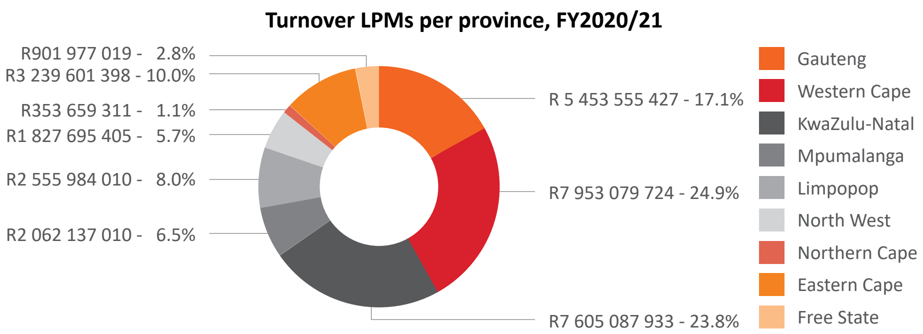


Figure 26: Turnover LPMs per province, FY2020/21

3. Gross Gambling Revenue Generated in the LPM Sector per Province

3.1. The total rand value of GGR generated in the LPM sector during FY2020/21 was R2 434 393 885, a fall by over a third (33.9%) from the previous financial year FY2019/20 (R3 681 852 665). This amount represents 10.5% of the total amount of GGR generated by all gambling modes. GGR in the LPM sector increased by 14.1% from FY2015/16 (R2 363 501 788) to R 2 696 846 443 in FY2016/17, increased by 9.8% to R2 960 822 948 in FY2017/18, increased by 13.2% to R3 350 530 532 in FY2018/19 and increased by 9.9% in FY2019/20 but fell by 33.9% in FY2020/21.

3.2. The Western Cape accounted for the highest amount of GGR generated in the LPM sector at 26.9% of the total GGR in FY2020/21 (as at 31 March 2021). GGR generated by LPMs in KwaZulu-Natal and Gauteng accounted for 24.6% and 17.2% respectively as reflected in figure 27.

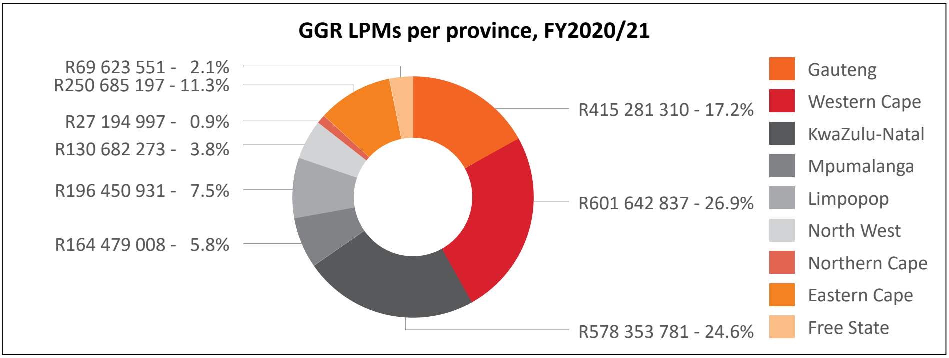


Figure 27: GGR LPMs per province, FY2020/21

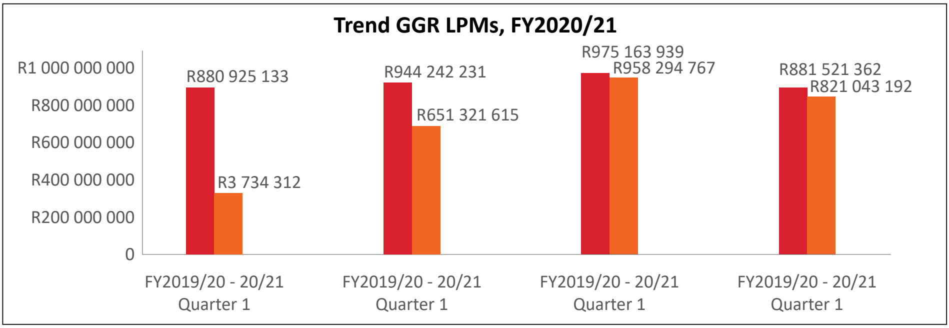


Figure 28: Trend in GGR LPMs, FY2020/21

4. Taxes/Levies Collected by PLAs from the LPM Sector per Province

4.1. The total rand value of taxes/levies collected by PLAs from the LPM sector during FY2020/21 was R291 356 069, a fall by 40% from the previous financial year (R482 878 260). This amount represents 14.2% of the total amount of taxes/levies collected by PLAs from all gambling activities. The collection of taxes/levies increased by 14.8% from R302 620 457 in FY2015/16 to R347 357 694 in FY2016/17, increased by 12.9% to R392 262 823 in FY2017/18, increased by 15.9% to R454 627 239 in FY2018/19 and increased by 6.2% in FY2019/20. Taxes/ levies decreased by 40% in FY2020/21 due to the effects of the Covid-19 pandemic.

4.2. KwaZulu-Natal has the highest number of licensed active LPMs in comparison to other provinces, and accounted for 29.8% of the taxes collected during FY2020/21. Gauteng and the Western Cape's taxes collected were roughly 21% each during the same period as reflected in figure 29.

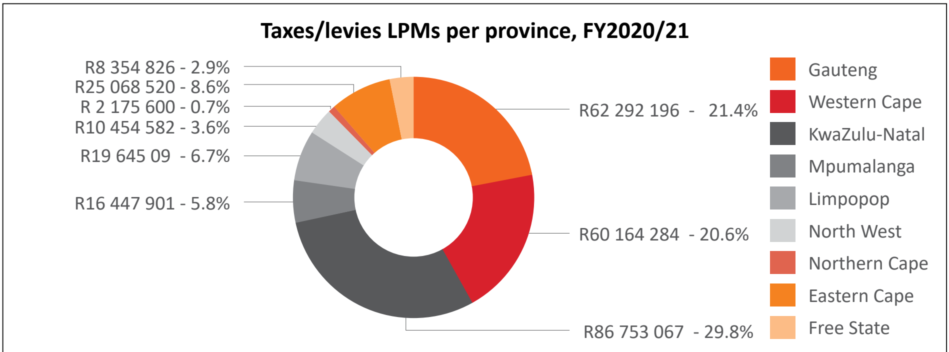


Figure 29: Taxes/levies LPMs per province, FY2020/21

CHAPTER 5

BINGO SECTOR

1. Market Conduct

1.1. Of the nine provinces in South Africa, bingo has been rolled out in six provinces: Gauteng, Mpumalanga, Limpopo, North West, Eastern Cape and KwaZulu-Natal. A total number of 65 (out of 69 licensed) bingo halls were operational as at 31 March 2021 of which 11 were operational in Gauteng, 15 in the Eastern Cape, 20 in KwaZulu-Natal, 7 in the North West, 6 in Mpumalanga and 6 in Limpopo.

1.2. Gauteng accounted for the highest number of licensed operational bingo positions or seats totalling 2408 (38%) out of a national figure of 8 625 licensed operational positions in FY2020/21 as at 31 March 2021, compared to the Eastern Cape (2 170 or 25%), KwaZulu-Natal (1 612 or 19%), Mpumalanga (530 or 6%), North West (880 or 10%) and Limpopo (1 025 or 12%).

1.3. Overall, more EBTs (8 097) were operational than traditional bingo positions or seats (528) as at 31 March 2021. The number of operational bingo positions increased by 31.3% from 6 497 in FY2016/17 to 8 520 in FY2017/18, increased by 1.1% to 8 610 in FY2018/19 and further increased by 9.5% to 9 427 in FY2019/20 but declined in FY2020/21 to 8 625.

1.4. It is important to note that as at 31 March 2021, more EBTs than traditional bingo seats were operational in all provinces offering bingo for play. No traditional bingo seats were operational in KwaZulu-Natal, Mpumalanga, North West and Eastern Cape in March 2021.

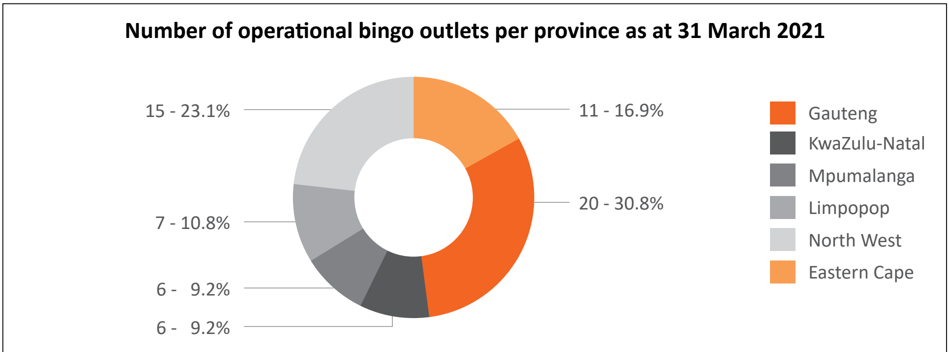


Figure 30: Number of operational bingo outlets per province as at 31 March 2021

2. Turnover in the Bingo Sector per Province

2.1. The total rand value of money wagered in the bingo sector during FY2020/21 was R17 202 280 357, a fall by 51.1% from FY2019/20 (R35 151 697 061). This amount represents 5.3% of all turnover (money wagered) across all gambling modes (i.e. casinos, betting and LPMs).

2.2. Bingo is offered for play in six provinces, namely Gauteng, KwaZulu-Natal, Mpumalanga, Limpopo, North West and Eastern Cape. The highest amount of money wagered in FY2020/21 was recorded in the Eastern Cape (30.4%) as reflected in figure 31.

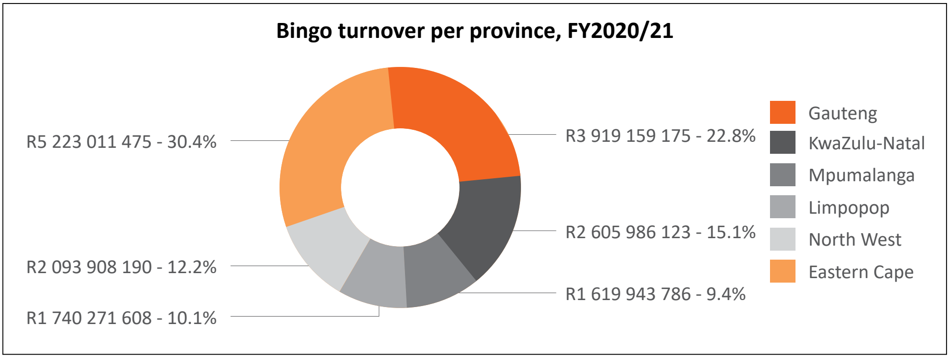


Figure 31: Bingo turnover per province, FY2020/21

3. Gross Gambling Revenue generated in the Bingo Sector per Province

3.1. The total rand value of GGR generated by the bingo sector during FY2020/21 was R1 103 215 830, a 40% decline from FY2019/20 (R1 810 774 980). This amount represents 4.7% of the total amount of GGR generated by all licensed gambling modes. An increase by 36.6% was recorded between FY2015/16 (R936 166 348) and FY2016/17 (R1 278 664 383). In contrast, GGR decreased by 2.4% between FY2016/17 and FY2017/18 (R1 248 509 057). An increase of 26.6% was realised in FY2018/19 (R1 580 744 888) and a further increase by 14.5% in FY2019/20 was recorded. However, in FY2020/21 GGR decreased by 40%.

3.2. Gauteng accounted for the highest number of licensed operational bingo positions, while the Eastern Cape generated the highest amount of GGR in FY2020/21 as reflected in figure 32.

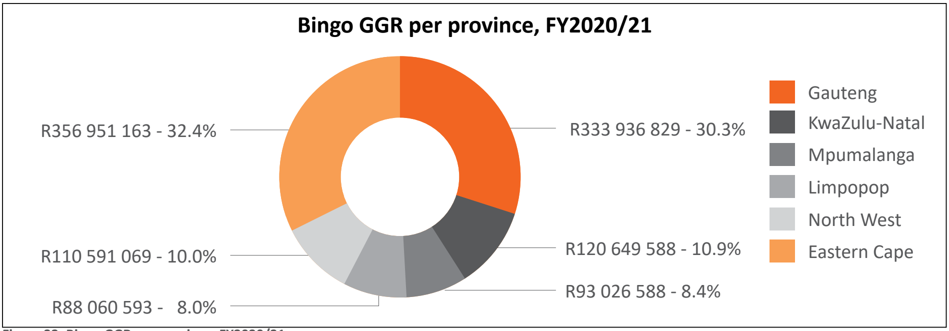


Figure 32: Bingo GGR per province, FY2020/21

3.3. Figure 33 compares GGR for each quarter in FY2019/20 and FY2020/21 showing that only Q3 exceeded the previous years' GGR.

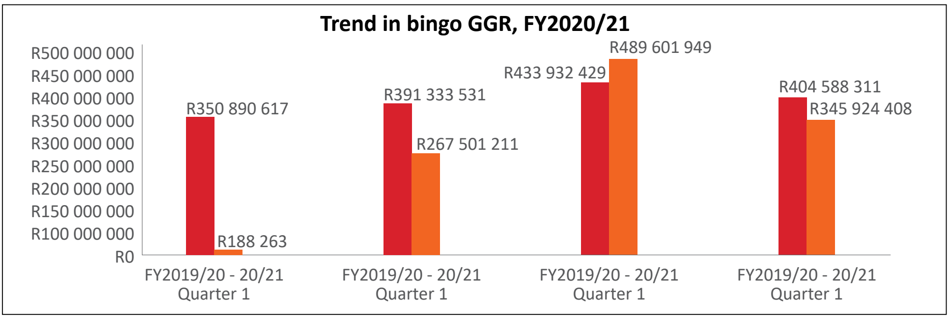


Figure 33: Trend in Bingo GGR, FY2019/20 - FY2020/21

4. Taxes/Levies Collected by PLAs from the Bingo Sector per Province

4.1. The total rand value of taxes/levies collected from the bingo sector by PLAs during FY2020/21 was R93 021 186, down by 45.9% from the previous financial year (R172 210 770). This amount represents 4.5% of all taxes/ levies collected from all gambling modes. The collection of taxes/levies increased by 37.6% from FY2015/16 (R101 588 469) to R139 826 159 in FY2016/17, however decreased by 7.6% to R129 221 043 in FY2017/18, but increasd by 20.6% to R155 778 315 in FY2018/19. Taxes increased by 10.3% in FY2019/20 but fell by 45.9% in FY2020/21 due to the Covid-19 pandemic.

4.2. Gauteng accounted for the highest amount of taxes/levies collected in FY2020/21 at 43.8% as reflected in figure 34.

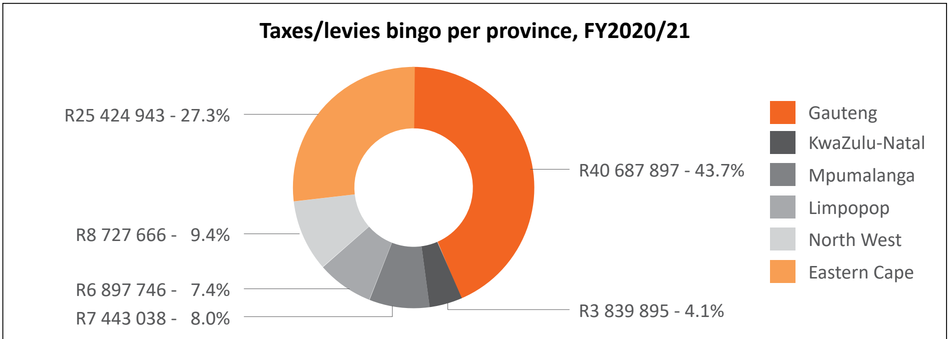


Figure 34: Bingo taxes/ levies per province, FY2020/21

CHAPTER 6

EMPLOYMENT

1. Employment Statistics

1.1. The NGB monitors direct employment numbers in the gambling sector (industry and regulators). A total number of 33 095 people (direct employment) were employed by the gambling industry as at 31 March 2021. In general, the casino sector and KwaZulu-Natal province accounted for the highest numbers as reflected in table 17 below.

DIRECT EMPLOYMENT PER PROVINCE AND MODE, FY2020/21										
	PROVINCE									
GAMBLING MODE	GP	WC	KZN	KZN	MP	LP	NW	EC	FS	TOTAL
Casinos	3 485	1 765	4 202	674	573	601	205	1 852	329	13 686
Totalisators	205	388	1 049	77	61	26	4	20	42	1 872
Bookmakers	528	490	3 166	1 357	1 524	845	123	471	288	8 792
LPMs	2 476	61	95	153	1 262	128	23	1 106	34	5 338
Bingo	164	0	743	223	236	174	-	1 053	-	2 593
Regulators										
NGB	33	-	-	-	-	-	-	-	-	33
PLAs	112	69	77	78	63	82	16	163	121	781
TOTAL	**7 003**	**2 773**	**9 332**	**2 562**	**3 719**	**1 856**	**371**	**4 665**	**814**	**33 095**

Table 2: Direct employment per province and mode, FY2020/21

CHAPTER 7

TRANSFORMATION [B-BBEE LEVELS]

1. Broad-Based Black Economic Empowerment (B-BBEE) Statistics

1.2. Broad-based black economic empowerment (B-BBEE) is an economic and political imperative in South Africa. Empowerment in the South African gambling industry is measured in terms of the Codes of Good Practice published by the Department of Trade, Industry and Competition (**the dtic**). The gambling industry, to date, does not have its own transformation charter. Thus gambling enterprises are measured in terms of the generic score card. On 11 October 2013, **the dtic** released the revised B-BBEE Codes of Good Practice. The old and new codes have been merged to monitor contributor levels applicable to FY2017/18 as follows: ownership, management control, employment equity, skills development, preferential procurement, enterprise (supplier) development and socio-economic development.

1.3. Based on the information submitted by PLAs, the average B-BBEE status or contributor level of the South African gambling industry as at 31 March 2021 per gambling mode and operator, was as follows:

- Average B-BBEE level for casino operators: Level 1.9
- Average B-BBEE level for totalisators: Level 7
- Average B-BBEE level for LPM operators: Level 2.8
- Average B-BBEE level for bingo operators: Level 2.6 (currently only operational in Gauteng, Mpumalanga, North West, Eastern Cape, KwaZulu-Natal and Limpopo)

1.4. Table 3 below shows the average B-BBEE level for all gambling modes between FY2011/12 and FY2020/21. The aveage score across all modes hovered between 2.1 and 3.6 over the past decade.

GAMBLING MODE	AVERAGE B-BBEE LEVEL (FY2011/12 – FY2020/21)									
	FY2011 /12	FY2012 /13	FY2013 /14	FY2014 /15	FY2015 /16	FY2016 /17	FY2017 /18	FY2018 /19	FY2019 /20	FY2020 /21
Casinos	2.5	2.4	2.3	2.1	2	2.3	1.6	1.4	1.5	1.9
Totalisators	3.4	3.2	2.6	2.4	2.3	4.6	4	4	5.5	7
LPM operators	2.9	2.4	2.5	2.1	2.7	3.6	2.8	2.7	1.9	2.8
Bingo operators	3.0	2	1.7	2	1.3	3	2.5	1.9	2.4	2.6
Average	**3.0**	**2.5**	**2.3**	**2.2**	**2.1**	**3.4**	**2.7**	**2.5**	**2.8**	**3.6**

Table 3: Average B-BBEE level per gambling mode (FY2011/12 – FY2020/21)

REFERENCES

National Gambling Act, 2004 (Act 7 of 2004)

Eastern Cape Gambling Board

Free State Gambling and Liquor Authority

Gauteng Gambling Board

KwaZulu-Natal Gaming and Betting Board

Limpopo Gambling Board

Mpumalanga Economic Regulator

Northern Cape Gambling Board

North West Gambling Board

Western Cape Gambling and Racing Board

NOTES

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