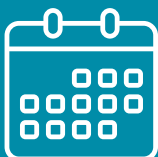


# Coronavirus and Trade Promotions: The Latest

## How is COVID-19 affecting trade promotions?

### Time to obtain permits



Currently the trade promotions regulators are issuing permits within about 5-7 business days in NSW, ACT and SA (with a premium application fee being paid in SA). For a standard application in SA, it is taking about 14 business days.

### Refund of permit fees for cancelled promotions



Currently NSW, ACT and SA are refunding permit fees if a promotion is cancelled due to COVID-19.

### Draws and scrutineers



If a draw location is not accessible, it is possible to arrange an alternative draw location. The SA regulator doesn't require a formal amendment to the Ts&Cs, only that we notify them. NSW and ACT require formal amendment applications to be submitted with an updated set of Ts&Cs before the draw.

If a scrutineer is required, they can attend by video link.

Where possible, the promotional website should note any change to the draw location, or if the draw can't be conducted publicly.

### Fee waivers for promotions with permits



Many promotions impacted by COVID-19 have needed amendments. The ACT and SA regulators have been waiving their fees for processing amendments to Ts&Cs that are due to COVID-19. NSW still requires payment of amendment fees.

Gadens and VCG PromoRisk recently formally requested that the trade promotions regulators waive permit fees to help promoters and service providers weather the COVID-19 crisis and stimulate business activity.

We await a response from ACT.

NSW says it won't waive fees at this stage, but the Community Gaming Regulation 2020 (NSW) remains in development. It is proposed that permits no longer be required in NSW for promotions with a prize value of \$10,000 or less, although various legal requirements will still apply to all trade promotions and penalties for breaches will be increased. The NSW regulator says more details will be published "later this year".

SA has responded stating that it will consider requests for trade promotions fee waivers on a case-by-case basis. We will test this with them, moving forward, by requesting fee waivers when we interact with them on specific promotions.

Please let us know if you think there are particularly strong arguments to support a request for a fee waiver in relation to any promotion you wish to run.

### What's next?

These are uncharted waters but we're here to help! Get in touch if you have queries.



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