

File: VL/AS

30 January 2017

Anna Giannakos
Adjudication
Australian Competition & Consumer Commission
23 Marcus Clarke Street
CANBERRA ACT 2601

BY EMAIL

Dear Anna

A91565 & A91566 – The Global Tote Limited – Submission

Tasracing Pty Ltd (**Tasracing**) was incorporated on 1 July 2009 and is domiciled in Tasmania, Australia. Tasracing is a state owned company. The company was formed following the separation of the Racing and Wagering functions of TOTE Tasmania (sold to Tatts group in 2011).

Tasracing was established by the *Racing (Tasracing Pty Ltd) Act 2009* and is governed by the *Racing Regulation Amendment Act 2008*. The principle Act is the *Racing Regulation Act 2004*. The responsible Minister is the Minister for Racing. Section 11 of the *Racing Regulation Act 2004* sets out Tasracing's responsibilities in detail.

Tasracing's principal activity is the administration, oversight and funding of the three codes of racing in Tasmania.

Tasracing's registered office and principal place of business is 6 Goodwood Road, Glenorchy TAS 7010.

Tasracing is concerned that the arrangements proposed by Global Tote could be used to avoid payments to Australian Racing Industries. As a result Tasracing would only provide authorisation to use Tasmanian racing products subject to considerable conditions including limitation on betback operations, only dealing with Australian registered wagering operators and all participating members must comply with the law and pay race field fees as if they are an Australian wagering operator.

If these conditions are met then the arrangements proposed by Global Tote will provide additional wagering product on Tasmanian races. Tasracing is not of the view that an interim authorisation will lessen competition from a wagering product perspective.

Tasracing is supportive of the interim authorisation to be granted to Global Tote as it will provide the racing participants (corporate bookmakers and punters) additional avenue for wagering, which may result in a more competitive environment.

Yours sincerely



Vaughn Lynch
CHIEF EXECUTIVE OFFICER