

REGULATORY IMPACT ANALYSIS REPORT

GAMBLING SECTOR IN BOTSWANA



*"A Diversified, Compliant and
Safe Gambling Industry"*

#InclusiveGrowth #QualityLives



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List of abbreviations

BURS	Botswana Unified Revenue Service
GA	Gambling Authority
GGR	Gross Gambling Revenue
LPM	Limited Payout Machine
MTI	Ministry of Trade and Industry
MoU	Memorandum of Understanding
MoA	Memorandum of Agreement
RFA	Request for Applications
RIA	Regulatory Impact Analysis
VAT	Value Added Tax

Where to report Illegal Gambling

Gambling Authority Landline: +267 395 7672
Responsible Gambling Self-help Portal:
selfhelp.gamblingauthority.co.bw
Gambling Authority Self Help USSD:
Dial *228# (All networks)



Title of the project: Gaming and Gambling Policy of 2002 Policy Review: Growth Strategies for the Gambling Sector

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Introduction


This Regulatory Impact Analysis (RIA) deals with the need to revise the existing policy framework that guides the regulation of the gaming and gambling sector in Botswana. The guidance that the policy provides does not seem to be sufficient, efficient and effective and therefore there is need of government intervention to ensure that:



the policy aligns with the current and future market and regulatory dynamics and technological advancement to fast track growth effort and sustainability of the industry;



there is diverse ownership and citizen inclusion participation in businesses operating in the gambling industry;



to make sure that businesses obtain their licences to fully exploit opportunities in various gambling activities; and



gamblers are adequately protected and receive counselling where necessary.

1 | Problem definition

This section of the RIA presents the problem statement, which, is titled “Lack of Growth and Development in the gambling industry”. This is the current issue that requires the Government’s intervention. The problem statement describes the context in which the situation appears, the causes that have created it, and the consequences it brings for the industry.

1.1 Overview of Botswana gambling sector

The gaming and gambling industry has been in existence since the early seventies in Botswana. Prior to 2014, the gaming and gambling industry was regulated through two Acts, they being the Casino Act (Cap.19.01) and the Lotteries and Betting Act (CAP.19.02) under the supervision and management of the Casino Control Board. There were about nine (9) casinos regulated by the aforesaid Board. Over the passage of time both Acts were viewed as being outdated and ineffective to facilitate the growth of the gaming and gambling industry that had evolved over time.

To address the above-mentioned challenges, the Government developed the Gaming and Gambling Policy of 2002 for purposes of facilitating the development and growth of the industry. Following the implementation of the Policy, the key milestones therein were achieved in a bid to transform the gaming and gambling industry. One of the key milestones set out in the Policy was the review and amalgamation of the Casino and Lotteries and Betting Acts and consequentially, the establishment of the Gambling Authority in 2014, which assumed the regulatory function of the gaming and gambling industry.

However, since implementation of the Gaming and Gambling Policy and the subsequent promulgation of the Gambling Act and its subsidiary legislation, the gaming and gambling industry is generally viewed as having stagnated. There is a feeling that the country has not realised any growth and development in the sector due to various reasons as number of licensed casinos has dropped from nine (9) to seven (7). The closure of two casinos’ is attributed to their inability to sustain their operations as the revenue generated annually was below breakeven, and the casinos were unable to meet their operational and regulatory overheads. This may be an indication that, cost of business compliance is a hindrance to potential starters. It is also notable that the Authority has not yet licensed any gambling activity as prescribed under the Policy and Act apart from casinos.

The industry performance in terms of Gross Gaming Revenue has averaged Two Hundred Million (BW P200 million) over a period of six (6) years, with an average annual growth of 1%. This insignificant growth indicates that the Gambling Authority as the industry regulator, has to exploit the economic potential of the industry.

Table 1: The current gambling industry performance in Botswana from 2016 to 2023

GAMBLING INDUSTRY PERFORMANCE 2016-2023						
YEAR	GGR (REVENUE GENERATED)	TAX DUE	ENTRANCE FEES @ 50%	LEVY @10%	RESPONSIBLE GAMBLING CONTRIBUTION (RGP) @5%	NUMBER OF EMPLOYEES
2016/2017	203 500 396,19	21 803 613,88	1 323 884,17	19 493 562,40	9 084 839,12	Not available
2017/2018	201 931 543,37	21 635 522,50	1 488 942,41	19 518 544,50	9 014 801,04	362
2018/2019	210 832 633,28	22 589 210,71	1 597 518,30	18 824 342,26	9 412 171,13	231
2019/2020	211 184 993,15	22 753 747,29	1 580 667,86	17 305 692,09	11 499 226,99	484
2020/2021	135 231 504,64	14 489 089,78	933 461,16	12 074 241,49	7 403 242,60	334
2021/2022	173 733 516,25	21 335 694,98	1 203 019,74	15 511 921,09	9 196 359,57	304
2022/2023	206 184 212,63	23 142 780,46	1 480 609,19	18 304 143,22	9 152 071,61	296
TOTAL	1 342 598 799,51	147 749 659,60	9 608 102,83	121 032 447,04	64 762 712,05	2011

Source: Compiled from GA annual reports

Based on the data in Table 1 above, it can be observed that over a period of six (6) years, the industry has remitted an averaged tax amount of P20 million pula to Government annually. This shows that the lack of growth in the gambling industry equally affects the taxes levied and collected by the licensees and remitted to Government. Furthermore, the table shows that the number of jobs has declined over a period of time due to unforeseen circumstances such as the COVID-19 pandemic which was the main contributor to job losses and probably closure of two (2) casinos. for years preceding 2019/2020

The stagnation of the industry development might be due to delays in issuing new licence types.

The gambling industry in Botswana is characterised by few players possessing multiple licences. This is an indication of a relative lack of diversity of ownership in the industry which might be the reason for lack of innovation by players as there is no competition threat by either new entrants or one of the players taking over some of the players. Licences can only be issued after the Authority has invited potential licensees to apply for available licences but many do not apply for the licences because the application process is costly and the licences are awarded to applicants with the best proposals. Furthermore, there is no information that can be used by potential investors to assess the lucrativeness of the gambling industry and conduct risk assessments.

The table below shows the performance of the local gambling market compared to certain jurisdictions with similar demographic characteristics to Botswana.

Table 2: the gambling industry performance in Botswana compared to other jurisdictions

	POPULATION	GGR (casinos)	GGR (National Lottery)	GGR (LPM)	GGR (Totalisator)	GGR (Bookmaker)	GGR (Bingo)
Botswana	2 346 179 (2022)	173 733 516.25	Estimation of 100 000 000.00	142 148 723.98	-	-	-
North-West Gambling Board	4 146 000 (2022)	480 608 455.45	N/A	140 857 529.63	22 327 061.30	98 033 532.17	110 158 58 0.47
Mauritius Gambling Board	1 300 557 (2022)	-	133 547 083.60	-	-	-	-
Malta Gambling Board	533 286 (2022)	245 594 802.56	-	-	-	-	-
East Timor	1 341 296 (2022)	There is a lot of gambling, but it is not regulated	-	-	-	-	-

Source: Compiled by Gambling Authority

Note: Some of the regional gambling jurisdictions do not have records, hence no data.

As indicated in the table above, each international jurisdiction GGR collection is far higher than that of Botswana and have multiple gambling activities in operations compared to Botswana, which has only managed to license casinos. Therefore, it means gambling opportunities in Botswana have not yet been optimally explored thus low revenue collection.

The Authority's inability to keep pace with the dynamics of gaming and gambling across the world, it has missed opportunities that exist in the gambling sector. It is assumed that one of the reasons that the Authority lags behind on is that the direction given by the policy has been superseded by events, for example the Policy focuses mostly on machines that are fixed to specific premises not the current technological advancement that has transformed the industry like online gambling. In addition, there is no clear guidance on how gambling related harm can be addressed as the Authority has done less in mitigating the issues of problem gambling thus failure to mitigate harm from gambling and to remove negative societal perceptions towards the sector.

Failure of the Authority to exploit new avenues in the gaming and gambling sector has negatively affected the socio-economic development side of the sector as well as the country. The Authority has experienced declining collection in the amounts of revenue collected in respect of fees and levies generated through gambling activities. As a result, government has also missed revenues in form of taxes and levies. Authority has not issued any new licenses to new shareholders to diversify the market share and foster and promote competition in the market. This also indicates a lack of growth, as the industry has not attracted any officially documented new market players, concerning both investors and shareholders.



1.2 Current legal framework of the Botswana gambling sector

The gaming and gambling sector is currently regulated by the following policy and statutes.

1. Gambling Act (2012)
2. Gambling Regulations (2016)
3. Gaming and Gambling Policy for Botswana (2002)

Table 3: Existing Legal framework in the gambling sector

Statutory Instrument name	Main Features	Challenges
Gaming and Gambling Policy for Botswana (2002)	<p>It recommended for the establishment of gaming and gambling regulatory body.</p> <p>Amalgamated and Consolidation of two Acts (Casino Act and Lotteries and Betting Act into single Gaming and Gambling Act</p> <p>Provides guidance on the development of the gaming and gambling regulatory framework of the country, such as operational requirements and standards, gaming and gambling machines and technology among others.</p>	<p>Outdated and does not conform to the current gaming and gambling trends, such as online gaming.</p> <p>It promotes misconception of the industry it regulates.</p> <p>The policy places much emphasis on casinos and national lotteries as opposed to the other gaming and gambling activities.</p> <p>Some policy clauses have been superseded by events for example under vetting, overt and covert surveillance issues, the policy has named only two investigative agencies leaving others as policy existed before establishment of some.</p>
Gambling Act (2012)	<p>It establishes and provides the mandate for the Gambling Authority</p> <p>It regulates the gambling industry in Botswana.</p> <p>Thirdly it provides for all matter's incidental thereto.</p>	<p>The Act has some constraints/restrictions that hinder the growth of the gambling industry.</p> <p>Not explicit in defining key gambling activities and equipment e.g. Limited Pay-out Machine</p> <p>Does not provide a comprehensive list of the types of licenses and their scope.</p>
Gambling Regulations (2016)	<p>It Provides the details of how the gambling industry will be regulated (how) of what the Act has stipulated.</p>	<p>It does not mitigate against gaps in the Act.</p> <p>Does not enable the Gambling Authority to effectively regulate various gambling activities.</p>

1.3 The problem under consideration

The Gaming and Gambling Policy of Botswana (2002) was aimed at creating an enabling environment for the gambling sector, market growth, diversification and expansion of the industry and mitigation of the socio-economic negative impacts associated with gaming and gambling activities among others. However, the experience since the inception of the policy and its subsidiary legislatures, the industry has realised decline in number of licensed gambling operators, low interest in venturing to the sector by investors despite new licenses introduced. So far, the Authority has licensed and monitoring only seven (7) casinos as against the initial nine (9) from takeover from the National Casino Board. The number of companies that have been licensed for casino licenses are five (5).

The current legal framework provides for different licence types for various gambling activities; however, the Authority has only issued one type of licence, namely a Casino Licence despite being empowered by both the Policy and Act to issue various licenses.

There is strong negative social connotation about gambling across the globe, but different jurisdictions have put in place mitigation measures in effort to protect consumers and make the sector attractive.

Though, the effectiveness of such mitigation is questionable, Botswana is not unique to that as up to date there is no information to support such. Instead, the sector is still subject to severe negative perception and also gamblers stigmatized.

Lack of attraction to the sector by the Authority, has denied both the Authority and Government the opportunities to raise revenue. The Authority has agreed that the industry is not fully explored.

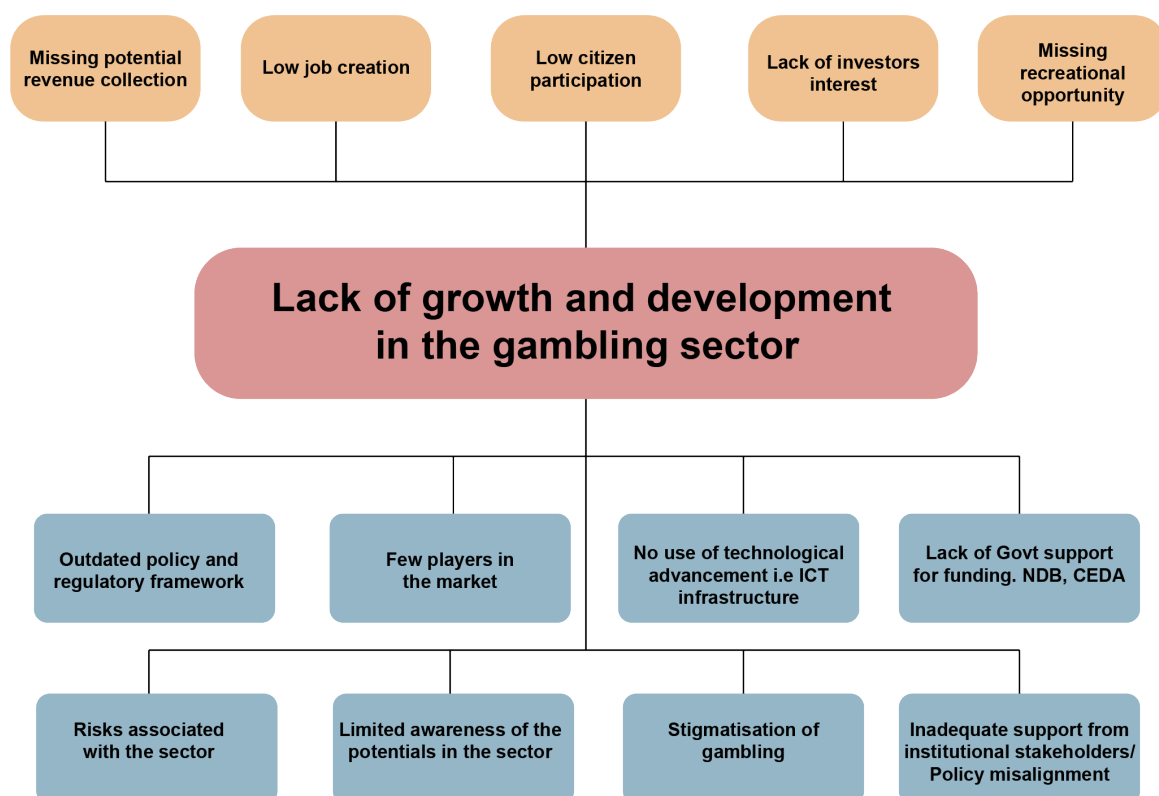


Figure 1: The Problem Tree

1.3.1 Causes of the problem

1.3.1.1 Outdated policy and regulatory framework/Obsolete Policy framework

The gaming industry has evolved over the years to align with the current trends. However, the policy has been overtaken by events. Though the policy was meant to develop and help diversify the gambling industry, it has not achieved such, for example failure to keep pace with the technological advancement has slowed the growth and ability to meet industrial and market needs.

1.3.1.2 Lack of sector funding by both Government Institutions and private

It is globally acknowledged that the gambling industry is a lucrative industry that can positively impact economic growth. On the other hand, financiers both from government institutions and private sector have been reluctant to fund the sector because of the negative connotation attached to it as they are uncertain about Return on investment, which is made worse by lack of supporting data and formal information about the level of lucrateness of the sector in Botswana's context.

1.3.1.3 Risks associated with the gaming and gambling industries

Inadequate research specifically in Botswana on the extent the gambling industry causes harm to gamblers and society. Additionally, there's insufficient information supported by evidence on how the gambling industry can tackle and address such issues. The gambling related harm or risks and non-mitigation interventions in place have the potential to deter gamblers from partaking thus hindering of any chances to improve the gambling sector. There is no clear assessment of harm gambling that all operators can follow. In general, public view there is no problem gamblers and responsible gamblers.

1.3.1.4 Stigmatization of gambling

Generally, Botswana have a negative perception of gambling, and consider it an illegitimate source of wealth and revenue. The perception has resulted in negative perception of gamblers and gambling in general. The negative connotations towards gambling has affected the growth of the industry thus impacting the general economy goals. Some of the perceptions are as follows:

- That gambling is for uneducated people, thieves etc.
- That gambling cannot be leisure or entertainment, but solely serves as a means to generate income/ an illegitimate source of income.

1.3.1.5 Limited awareness of the potential of the sector

Though the gambling sector is one of the oldest sectors in Botswana, up to date there is limited information about Botswana's gambling Sector and only few players mainly non-citizens are aware of this sector and its lucrativeness. Lack of awareness has led to low participation of citizens and low investment in the sector. The local institutions also are not aware of the potential of this sector to the economy for example funding ones as they are sceptical to finance the sector. There's a further need to conduct research and issue a report that presents empirical evidence on the gambling industry's untapped value and Return on Investment (ROI).

1.3.1.6 Inadequate support and Misalignment of the Policy and other related legal frameworks

The Government of Botswana has a new focus on Citizen Economic Inclusion and Empowerment. This means that state-owned enterprises mandated to fund and invest in several sectors in Botswana exclude gambling as a potential industry to invest in. In turn, the Botswana with the knowledge, and risk appetite to participate in the industry are unable to do so because they don't have access to capital. The gaming and gambling industry does not run absolutely. It is directly or indirectly affected by other statutory instruments for it to run effectively. For example, the policy mentions two security agencies for investigation and vetting, the Botswana Police and DCEC hence there is existence of the other organ being DISS.

1.3.1.7 Few players in the Market

The sector is characterised by few players hence there is lack of innovation meaning limited competition and limited choices for consumers and less competition. However, the few players expose the inadequacies of the regulatory environment in supporting activities for economic returns. Botswana's market is challenging due to the small population. This affects economic growth in its many sectors, which includes the gaming and gambling industry. It is assumed that the small population is a discouragement to investment.

1.3.1.8 Technological advancement in the gambling industry

The dynamics of gambling industry has evolved over time to keep pace with the advancement in the technology. However, the gambling industry in Botswana has been stuck in the physical gambling machines placed in various licensed premises whereas in the world the online gambling has taken a boom. Failure to take such advantage, our industry is likely to remain sluggish hence less contribution to economy

1.3.2 Consequences of the problem

Several consequences can be noted because of this problem. The stagnation of the sector has resulted in loss of possible opportunities of growth and the development in the gambling sector.

1.3.2.1 Missing potential revenue collection

The current revenue generation performance of Casino Licensees so far averaged around P20 million per annum. Despite operating in a regulatory environment that does not promote growth, licensees have, on average, experienced at least 1% growth per annum. The sector has not explored other gambling activities apart from casinos and new trends of gaming and gambling hence a potential loss of potential revenue or possible existence of some niches within the wider sector.

1.3.2.2 Low job creation

The absence of licensing other gambling activities, sluggish transformational efforts to new technological forms of gaming and gambling, all have negative impact in the development of the sector. It appears that transforming the gambling environment has the potential to create jobs but Botswana's has been stagnant with licensing of few casinos only. This is widely considered a clear loss for the country mainly attributed to lack of licensing stipulated gambling activities in the policy and failure by businesses or operators in the sector or indeed new entrants (who have been hard to come by) to innovate in line with new trends, patterns, and consumer demands. The gambling industry currently employs an estimated 296 employees (only in the casinos gambling activity). The industry has the potential to employ more people if different gambling activities can be licensed and more casinos set across the country.

1.3.2.3 Low citizens participation

Out of few eight (8) regulated casinos, six (6) are foreign owned and the remaining two (2) are citizen owned. Based on the given absolute figures, it can be observed that foreign ownership dominates the current market share at a rate of seventy-five percent (75%), while citizen participation stands at twenty-five percent (25%). There is a pressing need to increase citizen participation and ensure that newly licensed activities offer opportunities for inclusion across the entire gambling value chain. In most instances it was found that, due to information asymmetry about the sector, lack of funding for locals and mostly societal negative perception, the current players are most likely to be the ones to continue investing in the sector because of knowledge advantage and concentration.

1.3.2.4 Missing Recreational Opportunities

The gambling industry has a potential to create huge recreational opportunities in Botswana that could greatly benefit all players in the economy. Society's prevailing negative perception of gambling hinders its acceptance as a recreational activity. Furthermore, there is untapped potential for gambling to significantly boost Botswana's economy through "gaming tourism". Gaming Tourism is a specialised form of tourism that usually attracts large numbers of people to visit destinations with a high concentration of casinos and gaming sites such as Las Vegas and Macau. Both the Ngamiland and Chobe districts have the potential to become prominent gaming tourism hubs.



1.3.2.5 Lack of investor interest in the sector

Due to the existing bias, there is insufficient knowledge of the potential rewards investors can enjoy from investing in the gambling industry. While gambling requires substantial capital, investors have historically reaped significant rewards from this high-risk venture.

2 | Objectives of government intervention

The lack of growth in the gambling industry requires the intervention of the Gambling Authority. The purpose of such intervention can be encapsulated in the following set of objectives, categorised as operational, specific, and general.



Operational

- i. Create partnerships with key institutions sharing common policy goals.
- ii. Align with institutions that share common vision and policy goals.
- iii. Build awareness among private sector, public institutions, and society regarding the innovative approach to gambling.
- iv. Promote responsible gambling practices.
- v. Diversify licensed gambling activities.
- vi. Increase the number of license holders by 5% in the gambling sector by 2033.
- vii. Facilitate and promote the use of new technology.
- viii. Advocate for digital transformation within the gambling sector.
- ix. Harmonize existing statutes to create a conducive regulatory environment for licensees.



Specific

- i. Increase revenue collection.
- ii. Increase citizen participation in the gambling sector.
- iii. Contribute to job creation/employment opportunities in Botswana.



General

The Gambling Authority seeks to contribute to Botswana's transformative and socioeconomic development. These objectives ideally align with the SMART rule, ensuring they are:

- **Specific:** Addressing the various causes hindering growth and development in Botswana's gambling sector.
- **Measurable:** There must be measurable indicators that will allow the Gambling Authority to understand and record improvements in the gambling sector related to its development and growth. A comprehensive M&E plan is available at the end of the RIA Report, in Section 6.
- **Achievable:** The proposed objectives are structured in a causal chain that inputs and activities will allow the consolidation of key outputs (operational objectives) that will result (specific objectives) in impact (general objectives) in the gambling sector in Botswana.
- **Relevant:** the proposed objectives are relevant in the sense that they address the problem under consideration and define the end result expected to solve it, reducing the negative effects that are currently produced by the situation.
- **Time-dependent:** the proposed objectives take into consideration the diversity of regulated entities and stakeholders in the gambling sector and the need to have an adequate timeframe for them to be able to the proposed solutions.

The following table summarises the objectives and shows the selected indicators and time frame for each one of them:

Table 4: Objectives, Indicators and timeframes

Operational	Key indicators	Time frame
Create partnerships with key institutions with common policy goals.	<ul style="list-style-type: none"> ➤ No. of MoU signed with relevant institutions to strengthen the gambling sector such as: ➤ -Botswana Unified Revenue Services ➤ -Financial Institutions (investment banks included) 	March 2025
Align institutions with a common vision and policy goals	<ul style="list-style-type: none"> ➤ Signing of MOU's and MOA's that will assist in growing the industry. 	March 2025
Build awareness among private sector, public institutions and the society about the new approach to gambling	<ul style="list-style-type: none"> ➤ Number of outreach programmes conducted (education, open air campaigns, media, workshops) 	March 2026
Increase the number of responsible gamblers	<ul style="list-style-type: none"> ➤ Number of successfully rehabilitated gamblers as a result of counselling. ➤ Reduction in the number of applications for both self and third-party exclusions per annum. 	March 2027
Diversify gambling activities	<ul style="list-style-type: none"> ➤ Number of licenses issued against each gambling activity listed under section 33 of the Gambling Act 	March 2026
Increase the number of license holders by 5% by 2033 in the gambling sector	<ul style="list-style-type: none"> ➤ Number of license holders ➤ Number of licenced gambling establishments in operation for a continuous period (i.e. 3 years) 	March 2028
Facilitate and promote the use of new technology	<ul style="list-style-type: none"> ➤ An indigenous e-game created by a local developer in collaboration with the Botswana Innovation Hub 	March 2029
Advocate for digital transformation related to the gambling sector	<ul style="list-style-type: none"> ➤ Digitalized gambling activities such as online gambling 	March 2029
Harmonize existing statutes to create a conducive regulatory gambling environment	<ul style="list-style-type: none"> ➤ Independent Regulations for each gambling activity ➤ Flexible and robust statutory regulatory regime 	March 2026
Specific	Key indicators	Time frame
Increase revenue collection	<ul style="list-style-type: none"> ➤ P60 million collected from licensees per annum 	March 2028
Increase citizen participation in the gambling sector	<ul style="list-style-type: none"> ➤ 40 % market share of the gambling sector by Batswana 	March 2028
Contribute to job creation/employment opportunities	<ul style="list-style-type: none"> ➤ Number of jobs in the gambling sector 	March 2028
General	Key indicators	Time frame
Contribute to Botswana's transformational and socioeconomic development	<ul style="list-style-type: none"> ➤ Share of the gambling sector in GDP 	March 2029

3 | Options

Having identified the problem to be addressed and the objectives of government intervention, the Gambling Authority intends to promote growth and development in the gambling sector, taking into consideration the costs and benefits for different actors involved in this issue.

Table 5: Problem definition and policy objectives

Problem definition	Lack of growth and development in the gambling sector in Botswana	
Objectives	General objective	Contribute to Botswana's transformational and socioeconomic development
	Specific objectives	Increase revenue collection
		Increase citizen participation in the gambling sector
		Contribute to job creation
	Operational objectives	Create partnerships with key institution with common policy goals.
		Align institutions with common vision and policy goals
		Build awareness among private sector public institutions and the society about the new approach to gambling
		Increase the number of responsible gamblers
		Diversify gambling activities
		Increase the number of license holders by 5% by 2033 in the gambling sector
		Facilitate and promote the use of new technology
		Advocate for digital transformation related to the gambling sector
		Harmonize existing statutes to create a conducive regulatory gambling environment

Different options can be explored to address the problem and this section presents them in a comprehensive way. The construction of the various options has taken into consideration various issues, including the below:

- a. The current diverse situations regarding the performance of the gambling industry
- b. The existing legal framework for the sector
- c. International trends
- d. Statutory instruments available to promote growth in the gambling industry.
- e. Capacities of key stakeholders in the industry that can assist in developing the industry.

The following are the two (2) options that have been identified for the purpose of this RIA.

1. Do nothing. No intervention by the Authority would be envisaged.
2. Revise the existing gaming and gambling policy to facilitate gambling development and promote responsible gambling.

3.1 Option 1. Do nothing.

The option 1 refers to maintaining the status quo of the current problem and this would mean that the Authority does not intervene in any way.

Option 1 would imply the below considerations or assumptions:

- The existing provisions of gaming and gambling machines and technology would remain the way they are, they would not be updated in the five years. The industry will miss the opportunities of the developed technological infrastructure that aid the current online and i-gaming.
- Continuous ban of gaming and gambling activities advertising.
- The authority will continue to face challenges when they try to develop or improve legal frameworks in line to the policy that is viewed to be obsolete.

- The sustainability of the gaming and gambling sector is at risk due to misconception of the sector and viewing of gaming and gambling as a socially harmful act without considering the entire benefits.
- Exploration of other gaming and gambling activities will remain low, as the policy give limited developmental guidance of such activities. The sector would remain in one gaming and gambling activity, being casinos for a long time which is currently facing decline in operations.
- Problem gambling will remain a concern in the society in general if no further guidance is provided in the policy.

The inclusion of marginalised groups and citizen participation will remain low in the sector due to lack of funding as the policy stated that no additional investment simulation schemes will be avail apart from existing ones that are reluctant to fund gaming and gambling activities.

3.2 Option 2 - Revise the existing Gaming and Gambling Policy to facilitate gambling development and promote responsible gambling.

This will include different elements on the existing legal instruments (Act, Regulations, and Licensing Requirements) that can be considered to assist in the development of the industry. It (Option 2) proposes that the Gaming and Gambling Policy 2002 be reviewed to facilitate the ease of doing business in the gambling sector, as well as to overcome the public negative perception experienced by the regulator, gamblers, and operators.

Furthermore, several clauses of the policy have been identified as impediments to gaming and gambling sector development that emanates from the policy and are for review such as the following;

Technological advancements: According to the gaming and gambling policy, technological advancements refer to machines and equipment quality, video monitoring and surveillance hence the trends of gambling have evolved to other forms of gaming apart from the physical machines fixed to a premise(s). However, the Authority is faces challenges to regulate the emerging trends of gaming and gambling such as online gambling activities for development of the sector, plus it happens outside their jurisdictions, losing of revenue for both the regulator and the government.

The inadequacy in regulating the new techniques of gaming and gambling, has made the country as well as gamblers at risk of addressing issues of money laundering, undeclared earnings by gamblers from outside countries, uncontrolled gambling activities, loss of revenue collection among others, thus hampering the development of the sector.

The gambling technology is evolving rapidly subsequently the policy should be accommodative to such advancements such as online gambling.

Regulatory framework: the development and location of gaming and gambling operations are subject to market and social impact studies as well as market capacity.

This implies for one to express interest to start any operations must be guided by such studies, which up to date the Authority has not conducted. The restrictive nature of the policy, bars potential investors to set up gaming and gambling in areas of their choice without the Authority considerations. It can be assumed that this may have hindered the opportunities to establish gaming and gambling operations around the country as potential investors cannot start operations in non-identified areas as per the study or any kind of statistical or projected reference data that points to economic logic for starting a venture.

The policy has much guidance in Casinos and Lotteries as opposed to other forms of gaming or gambling. The lucrative of other forms of gambling are being missed, in the development of the diversified sector. Therefore, the policy should address other forms of gambling activities.

The policy is against advertising or promote gambling activities in places such as sports grounds, cinemas, malls, places of religious worship and schools. The policy should consider this provision as it is an impediment to the growth of the gambling sector.

The policy should encourage the social empowerment of the community. There is lack of infrastructure and the need for social or community development projects in Botswana. Therefore, the legislation should encourage initiatives that will contribute towards social and economic infrastructure that promote access to the economy for Citizens, in particular communities.

The policy should encourage the social empowerment of the community. There is lack of infrastructure and the need for social or community development projects in Botswana. Therefore, the legislation should encourage initiatives that will contribute towards social and economic infrastructure that promote access to the economy for Citizens, in particular communities.

Overt and covert surveillance: The policy makes references to Botswana Police Services and Directorate on Corruption and Economic Crime for conduction of overt and covert operations, but there are other security organs that partake part in such exercise such as Financial Intelligence Agency. The policy should open for other security agencies that may assist in intelligence gathering for smooth running and development of the sector.



4 | Impact assessment of each option

This section deals with the assessment of impacts and comparison of the different options that have been identified to solve the problem and are described in detail in Chapter 3. Due to the nature of the impacts that are expected from the various options, which include some costs and benefits that could be quantified and potentially monetised, but primarily qualitative effects, the selection of the methodological approach to conduct such assessment lies on the multi-criteria analysis (MCA), as the most adequate methodology to be used for this purpose.

The application of MCA requires different elements, inter alia, definition of adequate assessment criteria, setting the scoring system and allocation of weight to the different assessment criteria. The engagement with relevant stakeholders in this process is also part of MCA.

4.1 Methodological approach: the use of Multi-Criteria Analysis

MCA is a tool that is helpful to measure and assess the impact of different policy and regulatory options on various dimensions, such as economic, social, and environmental areas. It is mainly used where such options are complex, and a sound tool can be used as an alternative to cost-benefit analysis because those options cannot be measured in monetary terms.

MCA is based on four basic concepts that are interlinked: objectives, evaluation criteria, goals, and attributes.

- **Objectives** reflect the desired direction that the regulatory option brings. For instance, increase the number of licensees in the gaming and gambling sectors, create new jobs in the gambling sector, increase revenue collection, and contribute to Botswana's transformational and socioeconomic development.
- **Evaluation criteria** are generally the measurement instrument to assess the regulatory options in relation to the desired objectives. In general, more than one criterion could be established to assess the options in relation to the objectives.



- **Goals** refer to what is expected to be achieved in relation to the desired objectives. Depending on the direction of the impact, the best regulatory option would allow to reach more than just one goal.
- When a quantitative goal cannot be associated with a specific objective, due to limitations in the measurement, then an **attribute** can be used to indicate if it is expected to achieve a goal in the various regulatory options. For instance, "probability" through scales could be used, in order to understand if "it is extremely probable" or "it is absolutely not probable" that a goal will be reached. Typically, these scales have moderate or middle points in the assessment when analysing the various options.

MCA is a methodology that facilitates the aggregation of all objectives (goals), criteria (or attributes), and associated values for each one of the regulatory options that are analysed. Even if there are no perfect ways to conduct this aggregation process, some mathematical procedures can help in this process. For reasonable mathematical procedures, it is understood that some mathematical algorithms can be assessed not only through the formal features they represent but also in relation to the empirical consequences of their use.

In this particular case, the methodological MCA approach uses the outranking model, which lies on the theoretical concept of outranking relations and helps build a model of ranking preferences of all proposed regulatory options, taking into consideration their possible comparisons. Outranking models build a preference relation among regulatory options on several attributes.

4.2 Definition of the assessment criteria

In the context of MCA, the criteria are derived to enable a distinction between the devised options or alternatives. Criteria are performance measures that describe how well the policy options under consideration meet the desirable policy objectives derived from the analysis of the identified and investigated problem.

The following set of criteria have been developed in such a way that they:

- Address the completeness of the problem under consideration,
- Are non-redundant and operational,
- Reflect mutual independence of preferences,
- Avoid double counting potential impacts; and
- Are manageable in terms of their quantity.

The set of criteria selected for this RIA is presented in the table below.

Table 6: Performance criteria for the policy options

Assessment criteria and sub-criteria	Effectiveness to create investment confidence, facilitate entry and open new markets, measured by:	The increased number of investors in the gambling industry.
		Increased number of diverse gambling games, activities in different geographical locations.
		Increased confidence by interested stakeholders in entering the gambling industry.
		The interest of the financial institutions funding the industry
		The increased number of relevant stakeholders embracing the gambling industry and also participating in it.
	Ability to decrease stigma, measured by:	The decrease in cases of problem gamblers.
		The general public embracing the industry.
		The increased number of relevant stakeholders embracing the gambling industry and also participating in it.
	Implementation costs, measured by:	The Authority (GA)
	Ability to incorporate technological advancements, measured by:	New entry of advance technology industry players e.g. Online gambling
		Accessibility of best fibre network to support Technological advancement
	Capacity to offer financial resources to support the industry, measured by:	Commercial Banks Government financial agencies
	Capacity to adequately manage risks, measured by:	Improved knowledge and skills to better run or operate the gambling establishments.
	Capacity to ensure political commitments, measured by:	The length and the number of Statutory instruments passed to support the gambling industry.

The following subsections further elaborate on the identified criteria's.

Table 7: Criteria's explained

#	Criteria	Explanation
C1	Effectiveness to create investment confidence, facilitate entry and open new markets	Effectiveness usually describes the ability of an action to be successful and produce the intended results. In this case, the effectiveness describes the extent to which the option contributes to creation of conducive environment that promote investment confidence, facilitates entry, and opens new markets in the gaming and gambling sector.
C2	Ability to decrease stigma	This criterion refers to the extent to which the policy option can contribute to the reduction of negative and unfair perception towards gamblers, gaming and gambling activities and enterprise
C3	Implementation costs	Implementation costs are those that the Gambling Authority, as the main regulator in charge of the gaming and gambling sectors, will incur when rolling out the proposed options to achieve development and growth in the sector plus sensitization programmes cost implication.
C4	Ability to incorporate technological advancement	The ability to incorporate technological advancements includes not only the possibility to make use of new technologies in the products and services that are offered in the gaming and gambling industries but also to make use of the technological infrastructure available in Botswana. Further to stimulate the development of technological solutions that can be supportive to the development and growth of these industries.
C5	Ability to attract financiers to finance or fund the gaming and gambling industry	Refers to the extent to which the option will help attract financial institutions into funding the development and growth of the sector.
C6	Capacity to Adequately manage the risks	Improved knowledge and skills to better run or operate the gambling establishments.
C7	Capacity to ensure political commitments	The length and number of statutory instruments passed to support the gambling industry and the time required to amend the gambling statutes and reaching understanding with relevant stakeholders

4.3 Policy options assessment procedure

After the relevant set of assessment criteria was devised, the prioritisation exercise of the regulatory options was designed and performed as a collaborative exercise with the participation of relevant stakeholders. The objective of this exercise was twofold. First, to share with stakeholders participating in the process the intermediary results of the analysis (problem definition, objectives to be achieved, regulatory policies and assessment criteria). Second, to stimulate the active involvement of the stakeholders in the assessment of the current situation and each one of the identified regulatory options against the same criteria the regulatory options are expected to meet. In addition, stakeholders were asked to assign corresponding weights to the criteria that would reflect their relative importance in the assessment process.

Casinos, Service providers, Promotional competitions Horse Racing Association, Churches and Journey of hope (society) participants were invited to take part in this exercise. Participants were asked to complete a questionnaire to participate in the application of the MCA, which included the grading of the selected criterion in terms of the importance they attach to the individual criterion. Then they were asked to score the options against the criterion based on a developed scoring system ranging from 1 to 10. The importance scores or grades were used to compute the weighted importance or performance scores. They had to undertake assessment of each one of the regulatory options against the criteria and each other for weight allocation. They were selected based on a balanced representation of the various sectors that Gambling Authority regulates, in order to get different perceptions of regulated entities. They also included representation from key institutions in this process, including GA, and external consultants familiar with the gambling industry practices.

4.4 Comparison of the options

Based on the objectives that were defined, the criteria were set to be used in the systematic comparison of the regulatory options. Weights were assigned to the list of criteria, according to the perceived importance by different actors in order to meet the defined objectives, in the following way:

- Each criterion has a value, using a scale from 1 to 10, where 1 means “the least important” and 10 means “the most important”.
- Values of each one of the criteria were summed up.
- The value of each criterion was divided amongst the total number of points assigned to all the criteria with the goal to get the corresponding weight (in percentage). The sum of all percentages of all weights is total to 100%.

Table 8: Weights associated to the criteria, according to the perceived importance to achieve the objectives

	Importance	Weight of criterion (%)
Effectiveness to create investment confidence, facilitate entry and open new markets	8.23	15.09
Ability to decrease stigma	7.46	13.68
Implementation costs	7.46	13.68
Ability to incorporate technological advancement	8.31	15.23
Ability to attract financiers to finance or fund the gaming and gambling sector	8.00	14.67
Capacity to adequately manage risks	7.54	13.82
Capacity to ensure political commitments	7.54	13.82
TOTAL	54.54	100

Among the participating stakeholders, ability to incorporate technological advancement was considered the most important criterion (15.23%), followed by effectiveness (15.09%), ability to attract financiers to finance or fund the gaming and gambling sector (14.67%), Capacity to adequately manage risk and capacity to ensure political commitments both at 13.82%. The least important criterion was ability to decrease stigma and implementation costs (13.68%).

The direction that each criterion can have on meeting the objectives in the intervention has also been identified in the following way:

The direction that each criterion can have on meeting the objectives in the intervention has also been identified in the following way:

- In case of positive impact, a value of "+1" has been assigned to the criterion.
- In case of negative impact, a value of "-1" has been assigned to the criterion

The following table presents the direction of the impact for each criterion.

Table 9: Direction of the impact for each criterion

Criterion	Direction of the impact (+/-)
Effectiveness to create investment confidence, facilitate entry and open new markets	+
Ability to decrease stigma	+
Implementation costs	-
Ability to incorporate technological advancement	+
Ability to attract financiers to finance or fund the gaming and gambling sector	+
Capacity to adequately manage risks	+
Capacity to ensure political commitments	+

The performance of each regulatory option has been assessed against all criteria, in the following way:

- All regulatory options were analysed considering and assessment period of 5 year, applying it to all criteria.
- A scale from 1 to 10, where 1 means "the option does not meet the criteria at all" and 10 means "the option meet the criteria completely" was used.
- The evaluation of the regulatory options has been made in independent manner, according to the perspective of each one of the participating stakeholders. The average values of each criterion were considered for each regulatory option.
- An explanation was offered to each one of the stakeholders and they provided an explanation of their assessments in order to make the process transparent. This means that was a reasoning behind the assessment that was made.



The results of the analysis are presented in the following tables, one by regulatory option.

Table 10: Assessment of Option 1

Criterion	Average performance	Explanations
Effectiveness to create investment confidence, facilitate entry and open new markets	1.31	Doing nothing will not allow GA to improve the investment climate nor investor confidence.
Ability to decrease stigma	1.78	Moderate success in decreasing stigma as shown by the low weighted importance grade.
Implementation costs	4	This option does not involve implementation costs, as the regulator does not have to use any extra resources if status is maintained.
Ability to incorporate technological advancement	1.46	This option will not enable GA to incorporate technological advancement and stakeholders may continue to struggle to penetrate the market as status quo is maintained.
Ability to attract financiers to finance or fund the gaming and gambling industry	1.69	This option does not involve implementation costs, as the regulator does not have to use any extra resources.
Capacity to adequately manage risks,	1.77	Doing nothing will not assist in addressing challenges linked to risks. Rather, they could get worse.
Capacity to ensure political commitments,	7.62	Doing nothing will not assist in getting political commitment.



Table 11: Assessment of Option 2

Criterion	Average performance	Explanations
Effectiveness to create investment confidence, facilitate entry and open new markets	8.85	The option has the potential to lead to increased number of investors in the gambling industry, increased number of diverse gambling games, activities in different geographical locations., increased confidence by interested stakeholders in entering the gambling industry.
Ability to decrease stigma	7.46	This option has potential to influence stakeholders to embrace the gambling industry by participating in it as well as wooing financial institutions to fund the industry. The option could also lead to general public embracing the industry.
Implementation costs	6.69	This option has cost implications, but as seen by the grade, the implementation cost may be deemed manageable and unavoidable for the objective to be attained.
Ability to incorporate technological advancement	8.54	GA will see new entries of advance technology industry players to support Technological advancement
Ability to attract financiers to finance or fund the gaming and gambling industry	8.08	High potential to get Commercial Banks and Government financial institutions interested in the sector
Capacity to adequately manage risks	8.31	Indicates ability to manage risks if considered
Capacity to ensure political commitments	7.62	Score indicative of the option`s ability to ensure political commitment.

Using the derived weights for each criterion and the identification of the direction of the impact, the performance of each regulatory option has been calculated, as shown in the following table.

Table 12: Weighted performance of the regulatory with direction of the impact

Criterion	Weight of the criterion	Impact direction	Performance		Weighted performance with impact direction	
			Option 1	Option 2	Option 1	Option 2
Effectiveness to create investment confidence, facilitate entry and open new markets	15.09	1	1.31	8.85	0.20	1.34
Ability to decrease stigma	13.68	1	1.77	7.46	0.24	1.02
Implementation costs	13.68	-1	4.00	6.69	-0.55	-0.92
Ability to incorporate technological advancement	15.23	1	1.46	8.54	0.22	1.30
Ability to attract financiers to finance or fund the gaming and gambling industry	14.67	1	1.69	8.08	0.25	1.18
Capacity to adequately manage risks,	13.82	1	1.77	8.31	0.24	1.15
Capacity to ensure political commitments	13.82	1	1.69	7.62	0.23	1.05

Regulatory options were compared in pairs against the criteria. For each comparison, for instance, option 1 against option 2, it is always the case that option 1 outranks option 2. All weights of the corresponding criteria are summed up and have been attributed to option 1. In the opposite case, a "0" is given to option 1. In the same way, the comparison of regulatory option with itself becomes a "0" result for all criteria. For the comparison of regulatory options, data from the weighted performance was used.



Table 13: comparison of all regulated options, with their possible direction, against all criteria's

Criterion	Weight of the criterion (%)	Impact direction	Performance		Weighted performance with impact direction		1>1	1>2	2>1	2>2
			Option 1	Option 2	Option 1	Option 2				
Effectiveness to create investment confidence, facilitate entry and open new markets	15.09	1	1.31	8.85	0.20	1.34	0.00	0.00	0.15	0.00
Ability to decrease stigma	13.68	1	1.77	7.46	0.24	1.02	0.00	0.00	0.14	0.00
Implementation costs	13.68	-1	4.00	6.69	-0.55	-0.92	0.00	0.14	0.00	0.00
Ability to incorporate technological advancement	15.23	1	1.46	8.54	0.22	1.30	0.00	0.00	0.15	0.00
Ability to attract financiers to finance or fund the gaming and gambling industry	14.67	1	1.69	8.08	0.25	1.18	0.00	0.00	0.15	0.00
Capacity to adequately manage risks,	13.82	1	1.77	8.31	0.24	1.15	0.00	0.00	0.14	0.00
Capacity to ensure political commitments	13.82	1	1.69	7.62	0.23	1.05	0.00	0.00	0.14	0.00
TOTAL							0.00	0.14	0.86	0.00

Using the results of comparing all possible pairs of the regulatory options derived from the previous table, an outranking matrix has been prepared that shows how regulatory options perform one against the other. The numbers on the diagonal, which reflect the comparison of the regulatory option with itself, are obviously equal to "0".

Table 14: Outranking matrix of all possible regulatory options

	Option 1	Option 2
Option 1	0	0.14
option 2	0.86	0

Using data from the outranking matrix, ranking of all possible combinations among regulatory options is made. The combination with the high score reflects the ranking of the regulatory options, according to their performance against all criteria's, from higher to the lowest performance.

Table 15: Final ranking of all possible combinations among the regulatory options

All possible combination rankings	Pairs of options	Final results of the combinations
1-2	1-2	0.14
2-1	2-1	0.86

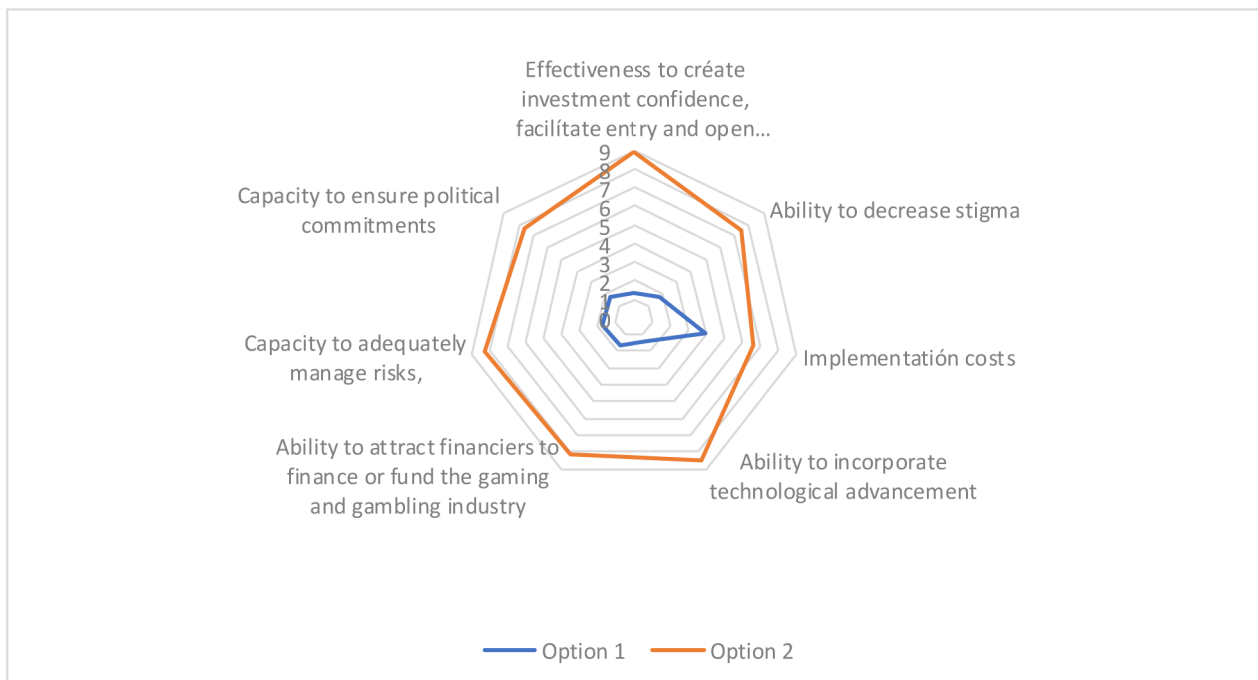
The combination of 2-1 has the highest score (0.86 points, meaning that the sequence (2-1) is the preferred one. This means that Option 2 outperforms option 1. Therefore, on the basis of the comparison of the two scores, Option 2 is the preferred option for Gambling Authority to implement.

5 | Conclusion: the preferred option

According to the analysis conducted in this RIA, and based on the discussions above, the preferred option is Option 2, which suggest the revising of the existing Gaming and Gambling policy. This is the option that best meets the criteria used to analyse the various possible interventions considered by GA for the problem the Authority faces, which relates to lack of growth and development in the gaming and gambling sector which may have some negatives results on the growth and development potential of the sector.

The following figure shows the way options relate to the various criterions selected for this analysis and graphically, it helps understand the differences when comparing the options.

Figure 2: Scores of regulatory options by criteria



In summary, by weighing the two options against each other and against their capacity to have positive impacts on the growth and development of the sector, option 2 appears to be the one to produce more positive results of the government intervention.

In particular, the review of the policy seems to be the most effective to promote and attract investment in the sector simultaneously building investor confidence, increases opportunity for funding the gaming and gambling industry by various financiers and to keep pace with technological advancement dynamics in order to align with the current gaming and gambling trends around the globe and ultimately promoting responsible gambling practices.

This option has the capacity to portray gaming and gambling as a form of leisure and entertainment hence erasing the negative perception toward the sector in general, therefore has the ability to decrease stigma towards the sector, therefore problem gambling can be dealt more effectively. Further, it has potential to make gaming and gambling enticing to both investors and gamblers,

In addition, Option 2 seems to be the most adequate way to manage possible risks that may be associated with the sector, as it is likely to offer the regulator an opportunity to include provisions that will align its policy to other policy and legal frameworks to tackle some of the stated challenges.

This option has implementation costs attached to its design and implementation, it does seem to be a relatively moderate costly way of addressing the problem..

6 | Implementation and monitoring of the preferred option

A successful implementation of the preferred Option (Option 2) is essential to effectively tackle the problem that was identified at the beginning of this RIA. Implementation is dependent on a number of issues, and it relies heavily on the Ministry and Authority determination that Option 2 has to be put into place and the support by regulated entities.

6.1 Implementation arrangements

The implementation of Option 2, relates to the review of the gaming and gambling policy, and will require intensive work from MTE, GA and regulated entities in order to make the sector guiding policy and also to ensure its effectiveness.

The design of the policy will consider the needs of regulated entities that GA regulates.

The review will have to be adopted by GA Board, after which, it will be incorporated into the running of the sector. It will further provide guidance and direction to any regulatory framework related to the sector.

In addition to the review of the policy, a sensitisation programme will be introduced to communicate the new provisions and improve knowledge among regulated entities and affected stakeholders.

The following phases and activities listed in the table below shows the implementation plan for Option 2.

Table 16: Implementation Plan

Policy action	Activities for implementation
1. Review of the policy	1.1 Comprehensive review of the current policy provisions and consultation with related legal framework
	1.2 Definitions of items to be included in the policy
	1.3 Consultation with relevant stakeholders
	1.4 Drafting of the policy
	Public consultation of the draft
	GA Board decision
2. Preparation of sensitisation programme	2.1 Definition of main message for sensitisation programme
	2.2 Communication campaign
	2.3 Design of communication platforms for sensitisation programme
3. Implementation of the reviewed policy	3.1 Set up of monitoring and evaluation mechanism
	3.2 Periodic review of the policy

6.2 Monitoring and evaluation

The implementation of the policy will be carefully monitored by GA. Gambling Authority has to develop the monitoring and evaluation tool to track and report its implementation success and failures. This will be done through continuous engagement with stakeholders for any implementation feedback.



7.0 | Consultation report

For the preparation of this RIA consultation processes, five (5) consultative meetings were undertaken. These included Gambling Authority staff, Casinos, Service providers, Parastatals, and financial institutions. It must be noted that the financial institution meeting was combined with mobile network service providers.

The consultative meetings were done to better understand the challenges, gaps, and successes of implementing the Gaming and Gambling Policy.

7.1 Stakeholder meetings

Some relevant notes of the discussions held with entities are reflected in the following table.

TYPE OF STAKEHOLDER	COMMENT
Gambling Authority staff	<ul style="list-style-type: none"> a. Looking at the current trends and how technology advances in the industry, the Gaming and Gambling Policy 2002 need is outdated. Subsequently, it needs to be reviewed to meet the demands in the industry. b. The Levy Fund should be used to develop industry e.g., Training and Localization (all licensees should go for training). c. The Authority should strike a delicate balance between regulating the gambling industry and protecting Licensees.
Casinos	<ul style="list-style-type: none"> a. The Policy is not aligned and does not address the current issues or challenges that Licensees have to deal with. b. There is need to engage Botswana Police Service (BPS) regarding the dynamics of the gambling industry. The BPS do not understand the monetary value of the some of the devices used in the gambling industry. For example, value chips are very valuable in the gambling industry, and if stolen, this should be punishable offence and the BPS need to in full understanding of this implication. c. The entrance fees need to be reviewed as some of the gambling jurisdictions do not require this. d. The Authority is overcharging Casinos, and the combined costs for levies, responsible gambling, VAT and GGR remain a great challenge for Licensees. e. There is a concern with regards to the licensing of LPMs, and their potential "mushroom effect". They further stated that the Policy's intention was to safeguard against the "mushrooming" of gambling establishments as this may have a negative effect and increase excessive gambling. f. The RFA Application process is too costly and tedious. The Authority should consider an application process that is easy but able to meet the Authority's requirements. g. We need buy in from Government especially when it comes to funding from government financial institution such as National Development Bank (NDB), Botswana Savings Bank (BSB), Citizen Entrepreneurial Development Agency (CEDA), BBS Bank Limited and Botswana Development Corporation (BDC).

	<p>h. The new proposed Policy should be known across the country. This is to get the views of the nation as much as possible. This so because the initial benchmarking of the Gaming and Gambling Policy 2002 was conducted in urban areas and did not take into consideration the views of the "ordinary Motswana" who live in rural areas and hence, Batswana has misconception of gambling.</p> <p>i. There's a current lack of expertise in the industry locally, requires an obligation to transfer knowledge and expertise of the gambling industry to Batswana. The Authority need to find a way to facilitate this.</p> <p>j. Advertising needs to be reviewed as this helps the licensees to generate revenue. The restriction on promotional advertising hinders the casinos to grow, previously under the Casino Control Board, Casinos were permitted to do promotional vouchers.</p>
Service providers	<p>a. Current regulatory framework does not favour Service Providers, who pay P50, 000.00 and P 25,000.00 for application and annual fees respectively. There's little maintenance work for the one licensed gambling activity, thus the cost outweighs the benefits.</p> <p>b. The Gambling Authority takes too long to consider employee licenses and to further provide feedback during the licensing process.</p>
Parastatals	<p>a. Most of the time, Botswana suffers due to lack of informed decision. Therefore, the Authority need to do more research in most of decision they want to make.</p> <p>b. The Authority need to observe how other parastatals are doing and align its programs towards them especially the ones which are relevant to it e.g., Botswana Investment Trade Centre (BITC).</p> <p>c. The Authority to create strategic go-to market value propositions that will attract investors to the gaming and gambling industry.</p> <p>d. The Ministry of Youth, Gender, Sport, and Culture would like to collaborate and with closely with the Authority as the ministry is mandated to empower the youth in all aspects e.g., For example youth can venture into gambling industry business.</p>
Financial Institutions	<p>a. The Financial institutions are more concern with the risk associated with the industry that they will be dealing with regard to the application they receive. In Botswana, gambling industry is more misconceptionized hence, it mostly receives negative publicity. So, the Authority need to do more to eliminate this misconception.</p>
Mobile network service providers	<p>a. The mobile network service providers do not generate enough revenue due to the population size and the level of economy of Botswana. Therefore, the Authority need to review the fees charged on promotional competitions.</p> <p>b. The Authority need to introduce online gambling in Botswana because there is appetite in the market.</p> <p>c. The Authority need also put emphasis on the gaming aspect as they are many in Botswana. For example, Snookers, PC games etc.</p> <p>d. Due to the misconception and the number of gaming devices and the games in Botswana, the Authority needs to change its name from Gambling Authority to "Gaming Authority".</p> <p>e. More than 60% of the population of Botswana is youth. Therefore, the Authority needs to review the age restriction and change it from 21 years to 18 years. Subsequently, this will also align with other national Statutory instruments.</p>

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