

Office of the Minister of Internal Affairs
Chair
Cabinet Social Wellbeing Committee

Online gambling: options for future-proofing harm reduction and returns from online gambling

Proposal

1. I seek Cabinet agreement for officials to undertake work on online gambling based on the proposed terms of reference attached to this paper (**Appendix A**). The work provides an opportunity to future-proof New Zealand's online gambling policy settings to ensure they are fit for purpose, ahead of an anticipated rise in participation by New Zealanders.
2. The previous Government initiated a review of class 4 gambling. However, I consider the rationale for this review no longer exists. I therefore propose to end the review and direct officials to develop measures to make the class 4 sector more efficient and effective, including measures to enhance harm prevention and minimisation.

Executive summary

3. New Zealand's regulatory framework for gambling is based on three principles:
 - communities should benefit from the profits from gambling;
 - harm is minimised and the cost of mitigating harm is borne by the industry; and
 - gambling is authorised and conducted by trusted and reputable providers.
4. Online gambling is a potential disruptor to these principles. There is no regulatory oversight of offshore providers, so there is no return to New Zealand communities from their gambling profits. There is potential for increased harm to New Zealanders as offshore providers are under no obligation to have consumer protection and harm minimisation measures in place. There is also no system in place ensuring offshore providers are reputable.
5. Information about New Zealanders' participation in online gambling is uncertain. We do not have accurate information about the extent to which New Zealanders are gambling online, the harm it may cause, or its potential opportunities.
6. I propose work be undertaken to provide better data on these matters and improve our understanding of the risks to those participating. It will also allow consideration of opportunities from extending online gambling, for example, by increasing returns to communities and tax revenues. Furthermore, it may result in safer gambling products, compared with those currently offered by offshore providers.
7. If this work is not carried out, there is a risk that future Government responses to any growth of online gambling are piecemeal, fragmented and rushed. Taking a proactive approach will better ensure that New Zealand's policy settings are fit for purpose.
8. I intend to establish a sector reference group to help gather information about the extent to which New Zealanders are gambling online. The group will develop policy proposals to be included in a public consultation document.

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9. I intend to report to Cabinet in April 2019 for approval to release a consultation document. I intend to report back to Cabinet by the end of August 2019 seeking final policy decisions.
10. The previous Government initiated a review of class 4 gambling in 2015. Evidence at the time indicated that the sector was in significant decline, which put community funding at risk. However, consistent increases in class 4 expenditure in recent years means that, at least in the short term, this rationale no longer exists.
11. I therefore propose to end the review and instead direct officials to work with stakeholders to develop a package of measures to make the class 4 sector more efficient and effective, including measures to enhance harm prevention and minimisation.

Background – New Zealand has a prohibition on online gambling, except for Lotto and the TAB

12. New Zealand has a general prohibition on the provision of online gambling. Section 9(2) of the Gambling Act 2003 (the Act) expressly provides that “remote interactive gambling” (online gambling) is illegal unless it is authorised by or under the Act.
13. The only providers authorised to offer online gambling products in New Zealand are the Lotteries Commission (through its Lotto brand) and New Zealand Racing Board (through its TAB brand). In 2016/17, the Lotteries Commission made \$235 million, which was distributed by the Lotteries Grants Board. The New Zealand Racing Board contributed \$161.6 million to racing, sports and community purposes in the same year.
14. The prohibition on providing online gambling does not prevent New Zealanders from gambling online with providers based outside New Zealand. However, it is illegal for offshore providers to publish an overseas gambling advertisement in New Zealand.

There are good reasons to look at online gambling

15. I am proposing that officials undertake work on New Zealand’s online policy settings, as set out in the attached terms of reference. This provides an opportunity to ensure the settings for online gambling are fit for purpose into the future.

The work provides an opportunity to ensure online gambling policy is consistent with New Zealand’s gambling regulatory framework

16. The regulatory framework for gambling in New Zealand is based on three principles:
 - communities should benefit from the profits from gambling (through grants and other distributions);¹
 - harm from gambling is minimised and the cost of mitigating harm should be borne by the industry (through a problem gambling levy); and
 - gambling is authorised and conducted by trusted and reputable providers.
17. Online gambling (and particularly online gambling provided by offshore providers) is a potential disruptor to New Zealand’s gambling model because:

¹ Casinos are corporate entities and are not required to return proceeds to communities; however they are subject to company tax, gambling duty and the problem gambling levy.

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- there is no return to communities from the proceeds of online gambling provided by offshore providers (all major providers of gambling in New Zealand, except casinos, are currently required to return proceeds to charitable or authorised purposes);²
 - there is potential for increased harm to New Zealanders as offshore providers are under no obligation to have consumer protection and harm minimisation measures in place; and
 - there is no tax or gambling duty revenue returned from offshore providers.
18. I am not recommending any changes to the current principles underpinning New Zealand's gambling framework. Rather, any future proposals will ensure that New Zealand's policy settings are consistent with the three principles.

The global online gambling environment is changing as technology advances

19. There is significant year-on-year growth in the global online gambling market. This is being facilitated by rapid technological change, including increases in the availability and speed of the internet and uptake of digital devices, such as smart phones and other portable devices.
20. There is also considerable growth in the range and variety of gambling products available online and in opportunities to gamble within games played online (e.g. gaming), or on game outcomes. This gives rise to a number of concerns, including how to keep pace and regulate for a changing online gambling environment and the associated risks of harm from online gambling.
21. The proposed work will enable officials to better understand developments in the global online gambling environment and how best to respond to them.

Information about the amount of online gambling by New Zealanders is uncertain

22. Online gambling has the potential to have a significant impact on gambling harm. Online gambling is increasing in other countries but information on the extent that New Zealanders are gambling online with offshore providers is unclear.
23. New Zealanders are gambling more online with New Zealand's two authorised providers. The Lotteries Commission reported in its 2016/17 Annual Report that online sales accounted for 13 per cent of its total sales, compared with 10 per cent the previous year.³ The New Zealand Racing Board noted in its latest six monthly report that online channels made up 59.2 per cent of its betting turnover, up 2.2 percentage points on last year. It also said that its online platforms were the fastest growing channels.⁴

² The New Zealand Racing Board has entered into some voluntary agreements with offshore providers who have agreed to pay an information use charge when they take a bet on a New Zealand racing or sports events.

³ New Zealand Lotteries Commission 2016/17 Annual Report, page 7.

⁴ New Zealand Racing Board Interim Financial Statements for six months ended 31 January 2018, page 3.

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24. Available information on New Zealanders' gambling with offshore providers is uncertain. Some studies indicate it is not increasing. For example, a Health Promotion Agency survey in 2016 noted that "between 2010 and 2016 there has been no statistical significant rise, overall, in the proportion of respondents who gambled online on an overseas website".⁵
25. An earlier study undertaken for the Ministry of Health concluded that online gambling with offshore providers did not appear to be a growing problem. A very small percentage (less than three per cent) of the population participated and, over the three years of the study, participation appeared to be in decline.⁶ Conversely, other research suggests that New Zealanders may have gambled approximately \$300 million with offshore providers in 2017, with the market growing annually between 12 and 20 per cent.
26. More information needs to be collected, and current data analysed, to allow officials to form any firm conclusions about online gambling by New Zealanders. If work is not carried out, there is a risk that future Government responses to any growth are piecemeal, fragmented and rushed. Taking a proactive approach offers the opportunity to better understand the issues and ensure that New Zealand's regulatory settings are fit for purpose.

There are risks from online gambling and we have an opportunity to address these

27. Health professionals and gambling harm treatment providers have expressed concern that online gambling may be more harmful than some existing forms of gambling. It has the potential to drive changes in behaviour to a greater, and more harmful, extent than some land-based gambling.
28. Some online products are interactive and more likely to represent "continuous" forms of gambling, which are known to be more harmful. This means there is a rapid connection between the gambling and the outcome, allowing gamblers to immediately gamble again. Gamblers more easily lose track of how much time and money they are spending on gambling. There is also harm associated with the solitary nature of people gambling in private, with the potential to access unregulated products online 24 hours a day.
29. Young New Zealanders may be at particular risk from online gambling as they are spending more of their lives in an online environment. Emerging risks for young New Zealanders from online gambling include:

⁵ Health Promotion Agency: Gambling Report – Results from the 2016 Health and Lifestyles Survey, February 2018, page 13.

⁶ Gambling and Addictions Research Centre: Offshore gambling by New Zealanders study, 11 September 2015, page 10.

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- the convergence of gambling and gaming. Gaming product developers are seeking new ways to extract additional revenue from their games. Some of these may involve elements of gambling. For example, there is increasing availability of “micro-transactions”, or “in-app” purchases within games where players pay for a chance to obtain a virtual good, or goods, via monetary payment. “Loot boxes” are one example of this convergence. Players can acquire randomly selected items through purchasing a “loot box” or “chest” to improve their chances of progressing in the game. These transactions have been considered a form of gambling in some jurisdictions;
- so-called “simulated” gambling on products involving free-to-play or using virtual currency, which may encourage younger people to start monetary gambling; and
- online gambling advertising targeted at younger New Zealanders.

There are potential opportunities from extending online gambling that could build community well-being

30. The technology associated with online gambling provides opportunities to monitor online gambling behaviours with the use of registered user accounts. This also creates the ability to limit potential harm, including the time and money spent on online gambling.
31. Both the New Zealand Racing Board and the Lotteries Commission are investing in technology to monitor how people use their online products. The use of data generated from gamblers’ accounts can assist these providers to mitigate harmful gambling behaviours.
32. An increase in authorised online providers and approved gambling products may also help boost aggregate returns to communities. Tax revenues and gambling duties could also increase from extending online gambling products. Any increase in gambling revenues and duties would need to be balanced against any potential increase in gambling harm.

Proposed terms of reference

33. The objective of the work proposed is to ensure New Zealand’s regulatory settings are fit for purpose for online gambling into the future, ahead of an anticipated rise in participation by New Zealanders. The attached terms of reference include:
 - researching the extent of New Zealanders’ gambling online and the current and likely impacts – particularly the real and potential harm associated with online gambling;
 - researching the convergence of gambling and gaming and investigating the design of online games that use micro-transactions and in-app purchases (e.g. loot boxes);
 - assessing the costs, risks, and benefits of allowing New Zealand gambling providers to provide new online gambling products;
 - considering ways to prevent and minimise harm from online gambling;
 - considering if there are any opportunities from extending online gambling, for example increasing returns to communities and tax revenues;
 - assessing the costs, risks and benefits of offshore providers either being authorised to operate in the New Zealand market (e.g. via licensing), or prohibited from operating in New Zealand; and

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- reviewing the current advertising rules applying to online gambling.

Consideration of some other current issues in the Gambling Act

34. The terms of reference include considering whether the Act's provisions should be extended to allow for online sales of gambling products, other than by the Lotteries Commission or the New Zealand Racing Board. An example is whether large lottery providers such as the Heart Foundation and Coastguard NZ should be allowed to sell their lottery tickets online. This work would also consider whether organisations such as kindergartens and schools should be allowed to raise funds through online raffle sales.

Advertising rules currently applying to online gambling

35. The terms of reference also include reviewing the current advertising rules applying to online gambling, with a particular focus on how they apply to offshore providers.
36. The two New Zealand-based online providers can advertise their online products in New Zealand. There are few restrictions on advertising, but the Lotteries Commission and the New Zealand Racing Board must comply with the Advertising Standards Authority's "Code for Advertising Gaming and Gambling". The Code is designed to ensure that advertising of gambling and gaming is conducted in a manner that is socially responsible and does not mislead or deceive the consumer.⁷
37. Section 16(1) of the Act prohibits offshore gambling providers from advertising in New Zealand. There have been recent examples of offshore providers marketing themselves in New Zealand via free-to-play websites, for example "JackpotCity". Because the websites do not advertise gambling, which requires payment to occur, there is no breach of the Act. However, these free-to-play websites often have a link allowing people to readily access a related offshore gambling website, thereby circumventing the advertising prohibition.

The terms of reference exclude online gambling matters included in the Racing Amendment Bill, but these could be added later

38. The Racing Amendment Bill (the Bill) currently before the House proposes to address issues of online gambling with offshore providers on racing and sports events. In particular, the Bill includes provisions for the creation and enforcement of charges applying to offshore providers taking bets on:
- New Zealand racing and sports events (information use charge); and
 - racing or sports events made by people based in New Zealand (consumption charge).⁸

⁷ The Advertising Standards Authority is commencing a review of the Code for Advertising Gaming and Gambling. The Department of Internal Affairs and Ministry of Health will be consulted during this process.

⁸ The Bill also allows the New Zealand Racing Board to undertake in-race betting and offer betting on a wider range of sports. It also provides for regulations on revising the formula for allocating proceeds from sports betting between the racing and sport sectors.

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39. The Bill is currently under consideration by the Primary Production Select Committee. The Minister for Racing also recently commissioned an Australian expert, John Messara, to review the racing industry's governance structures. Mr Messara's work will also help the Government determine if the Racing Act 2003 and the Bill are fit for purpose. Mr Messara has now reported back to the Minister for Racing.
40. Given the overlap between the online gambling work and racing work, officials will need to consider how progress of the Bill and Mr Messara's review will affect any policy proposals. It is possible that some of the Bill's proposals may be incorporated into the broader online work. This may depend on the Government's response to Mr Messara's review. Officials consider that the online aspects of the Bill could be easily incorporated into the online gambling work.

Any work on online gambling will be of interest to the gambling sector

41. This work will likely attract significant interest from the wider gambling industry and other stakeholders. The Lotteries Commission and New Zealand Racing Board will be particularly interested, as both may perceive any opening up of online gambling as a significant threat to their market position.
42. We are also aware of interest by SkyCity in becoming involved in online gambling. Any proposals by casinos to provide gambling products online will likely be contentious. In addition, we expect offshore providers to be interested in this work.

I propose to end the class 4 gambling review

43. In 2015, the previous government initiated a review of class 4 gambling to determine if the current policy settings were sustainable. Class 4 gambling refers to gambling on electronic gaming machines (also called "pokie" machines) hosted in pubs, bars and clubs. It does not include gaming machines located in casinos. A major driver of the review was evidence that the class 4 sector was in significant decline through falling revenue, and community funding was therefore at risk.
44. Class 4 gambling expenditure has consistently increased year-on-year since 2013/14. This trend has eased concerns about the community funding generated from class 4 gambling, at least in the short term, so the rationale for that review no longer exists. It is therefore my intention to end the review. I am proposing instead to direct officials to work with wider gambling stakeholders to develop measures to make the class 4 sector more efficient and effective, including measures to enhance harm prevention and minimisation.

Sector consultation

45. From meetings with sector participants and officials, I consider there is widespread support for the Government to look at improvements to online gambling regulation.
46. I intend to establish a sector reference group to help gather information about the extent to which New Zealanders are gambling online and to help develop policy options and a consultation document.
47. The reference group would include officials from the Ministry of Social Development and Ministry of Health. It may also include representatives from the Lotteries Commission and the New Zealand Racing Board, other large lottery providers, a casino representative, the Gaming Machine Association of New Zealand (representing class 4 gambling), the Problem Gambling Foundation, NetSafe, the Health Promotion Agency, Advertising Standards Authority and public health experts.

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48. I intend to seek Cabinet approval to publically release the consultation document in April 2019. Following the consultation process, I intend to report back to Cabinet by the end of August 2019 and seek final policy decisions.
49. There is significant public interest in gambling generally, as well as online gambling. Issues include consumers' ability to access online gambling products and their potential harm, and the impact of unregulated online gambling on community returns. There are also strongly-held community views on gambling harm.
50. Officials will develop a stakeholder management plan to support a strong level of engagement with gambling sector stakeholders. Members of the public will have the opportunity to comment on any proposals contained in the consultation document, before final proposals come to Cabinet for approval.

Financial implications

51. No financial implications arise from this proposal for approval of the terms of reference.

Consultation

52. The Ministry of Health, Ministry of Justice, Ministry of Social Development, Ministry for Pacific Peoples, Ministry for Women, Te Puni Kōkiri, The Treasury and the Department of the Prime Minister and Cabinet (Policy Advisory Group) have been consulted on this paper.
53. The Ministry of Justice, Ministry for Pacific Peoples, The Treasury and the Department of the Prime Minister and Cabinet made no comments on the paper.
54. Other agencies were supportive of the proposed work and made suggestions to improve the Cabinet paper and terms of reference, including:
 - amending the terms of reference to include online advertising;
 - broadening the proposed sector reference group to include public health experts;
 - ensuring the work focuses on younger New Zealanders; and
 - ensuring the work extends to investigating potential gambling within online gaming products, such as "loot boxes".

Human rights, gender and disability implications

55. There are no human rights, gender or disability implications arising from this proposal.

Legislative implications

56. There are no legislative implications that would result from approval of the terms of reference. However, I intend to seek final policy decisions in August 2019, which could lead to legislative change.

Publicity

57. I intend to publically announce the online gambling work. I also intend to publish this Cabinet paper, with the terms of reference and related Cabinet decisions on the Department of Internal Affairs' website, subject to the Official Information Act 1982.

Recommendations

58. The Minister of Internal Affairs recommends that the Cabinet Social Wellbeing Committee:
1. **note** that New Zealand's regulatory framework for gambling in New Zealand is based on the following three principles:
 - 1.1 communities should benefit from the profits from gambling (through grants and other distributions);
 - 1.2 harm from gambling is minimised and the cost of mitigating harm should be borne by the industry (through a problem gambling levy); and
 - 1.3 gambling is authorised and conducted by trusted and reputable providers.
 2. **note** that online gambling is a potential disruptor to these principles;
 3. **agree** that officials undertake work on online gambling to ensure New Zealand's online gambling policy settings are fit for purpose;
 4. **agree** that the work will include:
 - 4.1 researching the extent of New Zealanders' gambling online and the current and likely impacts – particularly the real and potential harm associated with online gambling;
 - 4.2 researching the convergence of gambling and gaming and investigating the design of online games that use micro-transactions and in-app purchases such as loot boxes;
 - 4.3 assessing the costs, risks, and benefits of allowing New Zealand gambling providers to provide new online gambling products;
 - 4.4 considering ways to prevent and minimise harm from online gambling;
 - 4.5 considering if there are any opportunities from extending online gambling, for example increasing returns to communities and tax revenues;
 - 4.6 assessing the costs, risks and benefits of offshore providers either being authorised to operate in the New Zealand market (e.g. via licensing), or prohibited from operating in New Zealand; and
 - 4.7 reviewing the current advertising rules applying to online gambling;
 5. **note** the terms of reference currently exclude those matters in the Racing Amendment Bill, which could be added later on depending on the Government's response to the Minister for Racing's racing review;
 6. **note** I intend to establish a sector reference group to gather information about the extent to which New Zealanders are gambling online and to help develop policy proposals and a consultation document;
 7. **note** that following this work I intend to report back to Cabinet in April 2019 and seek approval to release the consultation document;
 8. **note** that following the consultation process I intend to report back to Cabinet by the end of August 2019 to get Cabinet approval for final policy proposals;
 9. **agree** to end the review of class 4 gambling initiated by the previous Government; and

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10. **note** that I intend to publish this paper and related Cabinet decisions online, subject to consideration of any deletions that would be justified if the information had been requested under the Official Information Act 1982.

Authorised for lodgement

Hon Tracey Martin

Minister of Internal Affairs

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Appendix A

Terms of reference – Online gambling: options for future-proofing harm reduction and returns from online gambling

Title	Terms of reference
Purpose	To ensure the Gambling Act 2003 is fit for purpose in relation to online gambling. The work will develop recommendations for future regulation of online gambling in New Zealand.
Objectives	<p>Objectives are to:</p> <ul style="list-style-type: none"> • Ensure New Zealand’s policy settings for online gambling are fit for purpose for the emerging online gambling market. • Ensure policy settings for online gambling reflect the current principles of New Zealand’s regulatory framework for gambling. • Consider if there are any opportunities from extending online gambling, for example, increasing returns to communities and tax revenues. • Provide advice on how to address the disruption caused to the New Zealand regulatory framework by New Zealanders legally gambling on overseas websites. • Provide advice about how the potential harm from online gambling could be prevented and minimised. This applies to gambling by New Zealanders on overseas websites, as well as any legal domestic offerings.
Context	<p>Online gambling typically refers to gambling activity carried out by a remote interactive device via the internet. The device will usually be a desktop computer, laptop, smart phone, other handheld device, or a smart television.</p> <p>Online gambling is considered to be the global gambling industry’s fastest growing sector. By 2020, estimates of spending in the online gambling market are US\$60-65 billion, up from around US\$38 billion in 2015.</p> <p>The Gambling Act 2003 currently allows two New Zealand providers, the Lotteries Commission (through its Lotto brand) and the New Zealand Racing Board (through its TAB brand), to provide online gambling products. New Zealanders can gamble online with any offshore provider. However, it is illegal for offshore providers to advertise in New Zealand.</p> <p>Online gambling has the potential to significantly increase gambling harm. It is increasing in other countries but information on the extent that New Zealanders are gambling online with offshore providers is unclear. There is growing interest from a range of New Zealand gambling providers to take advantage of digital trends and offer online gambling products.</p> <p>There is concern from organisations working with problem gamblers of potential increases in harm to individuals, families and whānau from online forms of gambling.</p>
Issues	<p>The regulatory framework for gambling in New Zealand is based on three principles:</p> <ul style="list-style-type: none"> • Communities should benefit from the profits from gambling (through grants and other distributions); • Harm from gambling is minimised and the cost of mitigating harm should be borne by the industry (through a problem gambling levy); and • Gambling is authorised and conducted by trusted and reputable providers. <p>Online gambling with unregulated offshore providers is a potential disruptor to this framework because there is:</p> <ul style="list-style-type: none"> • No return to communities from the proceeds (all major providers of gambling in New Zealand, except casinos, are currently required to return proceeds to

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	<p>charitable or authorised purposes);</p> <ul style="list-style-type: none"> • Potential for increased harm to New Zealanders as offshore providers are under no obligation to have consumer protection and harm minimisation measures in place; and • No tax or gambling duty returned from offshore providers. <p>Information about the extent of online gambling by New Zealanders is contested. This work provides an opportunity to improve understanding of the online gambling environment.</p> <p>Health professionals and problem gambling treatment providers consider that online gambling may be more harmful than many traditional forms. This is because it has the potential to drive changes in behaviour to a greater and more harmful extent than some land-based gambling.</p> <p>Young New Zealanders are spending more of their lives in an online environment. There are emerging risks to young New Zealanders from online gambling (and gaming products), including “simulated” (free-to-play) gambling and pay gambling within online games.</p> <p>There may be opportunities from extending online gambling, for example boosting aggregate returns to communities and increased tax revenues.</p>
Scope of work	<p>In scope</p> <ul style="list-style-type: none"> • Researching the extent of New Zealanders’ gambling online and the current and likely impacts – particularly the real and potential harm associated with online gambling; • Researching the convergence of gambling and gaming and investigating the design of online games that use micro-transactions and “in-app” purchases such as loot boxes; • Assessing the costs, risks, and benefits of allowing New Zealand gambling providers to provide new online gambling products; • Considering ways to prevent and minimise harm from online gambling; • Considering if there are any opportunities from extending online gambling, for example, increasing returns to communities and tax revenues; • Assessing the costs, risks and benefits of offshore providers either being authorised to operate in the New Zealand market (e.g. via licensing), or prohibited from operating in New Zealand; and • Reviewing the current advertising rules applying to online gambling. <p>Out of scope</p> <ul style="list-style-type: none"> • Matters covered in the Racing Amendment Bill (the Bill). There is the possibility that some of the Bill’s proposals may be incorporated into the broader online work
Linkages to other programmes	<ul style="list-style-type: none"> • Potential changes to class 4 gambling (“pokies”) • Racing Amendment Bill
Key stakeholders	<ul style="list-style-type: none"> • Gambling industry representatives • Problem gambling service providers • Gambling Commission • Ministry of Health • Ministry of Social Development • Oranga Tamariki • Advertising Standards Authority • Public health experts • Digital safety experts (e.g. NetSafe)

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Indicative timeframes	<p>September 2018</p> <ul style="list-style-type: none">• Cabinet approval of terms of reference• Establish sector reference group to help develop policy options to be included in a public consultation document <p>September 2018 – April 2019</p> <ul style="list-style-type: none">• Identify issues and possible solutions, to help options development• Cabinet approval by April 2019 to release a consultation document <p>May 2019 - August 2019</p> <ul style="list-style-type: none">• Receive and analyse submissions on consultation document• Cabinet approval of final policy proposals by end of August 2019 <p>September 2019 onwards (depending on final policy approvals)</p> <ul style="list-style-type: none">• Development of draft legislation• Legislation passed by April 2020
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