

March 10, 2021

House of Commons Standing Committee on
Justice and Human Rights

Re: Submission from Atlantic Lottery on Bill C-218

Dear Committee Members,

Atlantic Lottery (ALC) appreciates the opportunity to provide comment on Bill C-218, *the Safe and Regulated Sports Betting Act*. By way of background, ALC is owned by the governments of the four Atlantic Provinces and is the regulated provider of lottery products and games in the region, including being the trusted provider of Pro•Line parlay sports betting in Atlantic Canada since 1994 (available online since 2004). In addition, ALC owns and operates the Red Shores harness racing and gaming facilities in Charlottetown and Summerside, PEI. Every year, 100% of ALC's profits stay in the region to help fund services essential to Atlantic Canadians, like health care, education and infrastructure.

ALC is committed to the highest levels of corporate social responsibility and responsible gambling. It holds the World Lottery Association's highest level of responsible gambling certification (Level 4), which includes a commitment to the most stringent standards and continuous evolution of responsible gambling practices. ALC provides players with access to tools, features and information to help them make informed decisions when playing Atlantic Lottery products. This includes system and game features as well as information on prize structure, odds and how the games work, facts that dispel common gambling misconceptions, and PlayWise materials to help players recognize warning signs of problem gambling. ALC also provides community resource information and helpline numbers for those who may experience problems with their gambling.

Specific to online gambling, ALC's online games are some of the safest offerings it provides, as they are all based on registered, known play. In practical terms, this means ALC's website gives players the information and tools they need to manage and monitor their play. Players can set weekly deposit limits, wager limits, session time limits, take a 24-hour break, or even self-exclude, meaning they can voluntarily prohibit themselves from online play for 6, 12, 24 or 36 months. ALC has also launched its industry-leading online responsible gambling tool – PlayWise Rating. This tool provides players with a confidential personal play rating, at the behavioural level, to help them understand their play and how it is evolving over time. In addition, Atlantic Lottery's products are only available to adults 19 years of age or older. In order to play on alc.ca, all players require an alc.ca account, created using third-party age and identity verification.

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Presently, Atlantic Canadians have easy access to hundreds of unregulated single event sports betting websites. These websites are, for the vast majority, located outside of Canada and many are based in tax havens. They are not accountable to provincial regulators, they do not return revenues to the four Atlantic Provinces to fund programs and services, and most critically, their primary mandate is not to offer products in the most responsible manner possible. Unregulated providers are also often lacking in age of majority controls. These unregulated gaming companies have significantly increased their advertising and promotions to Atlantic Canadians over the past year.

ALC recognizes the importance of offering its players a regulated, single-event sports betting alternative to the unregulated offshore market and supports changes to the *Criminal Code of Canada* that would allow provinces and territories to regulate single-event sports betting. With respect to horse racing, it is ALC's position that this activity should continue to be regulated by the Federal Government through the Canadian Pari-Mutuel Agency.

ALC looks forward the day when it can provide players with a safer, regulated single-event sports betting option that keeps revenues here in region for the benefit of Atlantic Canadians. Once again, thank you to the committee for the opportunity to provide input on this important piece of legislation.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Daigle' with a stylized flourish at the end.

Patrick Daigle
President and CEO
Atlantic Lottery

Newfoundland and Labrador is operating in a caretaker period due to a provincial election and is unable to participate.