

Nova Scotia Gaming Foundation

Moving Forward Together

Submission to the Responsible Gaming Strategy 2011-2016



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INTRODUCTION

This submission to the 2011-2016 Responsible Gaming Strategy is based on the dual perspectives of consumer protection and harm reduction. Following a brief overview of the Nova Scotia Gaming Foundation and a review of the successes and challenges resulting from Nova Scotia's first Gaming Strategy, the document is organized into five sections that correspond to the 2011-2016 Responsible Gaming Strategy Terms of Reference:

- Governance and government structures
- Business of gambling
- Prevention and treatment
- Research
- New and emerging technologies, including the video lottery card-based player management tool and internet gambling

OVERVIEW OF THE NOVA SCOTIA GAMING FOUNDATION

The mandate of the Nova Scotia Gaming Foundation (NSGF) is to:

- receive, maintain, and disburse funds to address problem gambling in Nova Scotia,
- collaborate and cooperate with other government and non-government organizations and agencies to best facilitate an effective response to problem gambling issues and needs,
- participate in, or otherwise support, government's approach to gaming and problem gambling in Nova Scotia,
- advance a perspective of social responsibility and ethical public policy relative to gaming in Nova Scotia.

Through its granting and research programs, the NSGF works with a diverse set of organizations, each having have a direct or indirect interest in helping problem gamblers. The NSGF derives a unique perspective from its involvement with researchers, provincial government departments, district health authorities, and regional and community-based groups.

REVIEW OF *A BETTER BALANCE: NOVA SCOTIA'S FIRST GAMING STRATEGY*

The NSGF is in agreement with the principles of the 2005-2010 Gaming Strategy and supports retaining them for 2011-2016:

- Protect and benefit Nova Scotians
- Put social responsibility first
- Make revenue a secondary priority
- Help those who need it and prevent problems wherever possible
- Extend the benefits to the people in communities
- Make evidence-based decisions
- Ensure integrity and security
- Give Nova Scotians the facts

The gambling environment in Nova Scotia has changed dramatically from 2003 to 2010, the period in which the Government began to examine the impacts of gambling through such documents as the *2003 Adult Gambling Prevalence Study*, the 2005 Gaming Strategy, and the *2007 Adult Gambling Prevalence Study*. For example, several important adjustments were made to the Video Lottery Terminal program, social-marketing initiatives were launched to increase public awareness of “responsible gambling”, resources were developed for the dissemination of prevention messages and the promotion of the Problem Gambling Helpline, and Addiction Services throughout the province saw an increase in funding for gambling-specific programs and services. As a result of many of these changes, there has been an overall increase in the support available for problem gamblers, those at risk, and family and friends.

Given these changes, a key measure of impact should be reflected in problem gambling rates. Unfortunately, the *2007 Adult Gambling Prevalence Study* found no statistically significant difference in problem gambling rates between 2003 (2.1%) and 2007 (2.5%) (p. 5). Young adults aged 19-24 continue to stand out as being “at-risk”, and those aged 25-34 now experience the highest rates of problem gambling, which suggests the 2003 at-risk group is now experiencing gambling harm.

We also know that a disproportionate amount (95%) of gambling revenue in Nova Scotia continues to be generated from “regular” gamblers.¹ Moreover, almost 40% of revenue comes from the 6.1% of Nova Scotian adults categorized as “at-risk” or “problem” gamblers.

¹“Regular” gamblers are those who gamble once a month or more. One-third of this group (33.6%) typically gambles once a week or more (2007 Adult Gambling Prevalence Study).

Reduction in reliance on VLT revenue

In the 2005 Gaming Strategy, the reason cited for reducing the number of VLTs and operating hours was to “Significantly reduce the reliance on video lottery revenue and reduce the video lottery revenue coming from high-risk and problem gamblers.” However, despite removing 1,000 VLTs from retail locations and reducing operating hours, the stated goal was not realized. Of particular concern, overall VLT revenue (excluding First Nations) increased by 5.3% (\$35 million) from 2008 to 2009, according to the Alcohol and Gaming Division’s 2008-2009 Annual Report.

Revenue Growth

The 2005 Gaming Strategy also addressed revenue growth:

“Growth in revenues will occur only if it is responsible growth, meaning that it is not generated from an increase in the overall prevalence of problem gamblers. New forms of gaming will be assessed and introduced only if they pass this test.”

The strategy also identified a specific measure for ensuring the growth of responsible gaming products:

“Ensure that any new products meet specific standards for social responsibility.”

In 2006, the Nova Scotia Gaming Corporation (NSGC) developed a Social Responsibility Assessment (SRA) Program to guide decision-making for the introduction of new products, marketing approaches, or projects by the NSGC and its two operators, the Atlantic Lottery Corporation (ALC) and Great Canadian Gaming Corporation. This policy was intended to standardize Nova Scotia’s approach to social responsibility within the Province’s gambling industry.

However, these standards were not independently developed or monitored, and in at least two instances, the standards were not adhered to. These instances include the introduction of Electronic Keno and the increase in online betting at ALC.

In the case of Keno, an electronic form of the game was rolled out in bars across the province in February and March 2009 with limited or no public consultation. This decision did not support the Gaming Strategy’s goals as well as the Nova Scotia Gaming Corporation’s stated Social Responsibility agenda: at an International Responsible Gaming Conference in Stockholm, Sweden in October, 2007, the spokesperson for the NSGC highlighted its decision not to introduce the product to Nova Scotia because the organization’s research had shown the game would be played by “higher risk players and would be particularly attractive to VLT players.” Although subsequent changes were made to the design of the game, no pilot was undertaken to ensure this product was low risk, despite research demonstrating that electronic forms of gambling pose a higher risk.

A similar incident occurred with ALC increasing its online betting limit from \$99.00 to \$1000.00 in August 2009 with no public consultation.

Online gambling is by far the most accessible form of gambling available, and access and availability are correlated with risk, yet these two examples highlight the increase in both. In addition to being in conflict with the NSGC's own Social Responsibility agenda, these decisions demonstrate a disconnect between the goals of the 2005 Gaming Strategy and later revenue-generating actions.

Therefore, the NSGF emphasizes the importance of ensuring that all revenue-generating entities adhere to the Social Responsibility inclusions of the new Gaming Strategy. How this can be accomplished is included in our recommendations below.

GOVERNANCE AND GOVERNMENT STRUCTURES

This section addresses the mandates of provincial gambling-focused agencies and organizations as well as the overall approach to the business of gambling in Nova Scotia.

Recommendation #1:

Remove the social responsibility mandate of the Nova Scotia Gaming Corporation.

Many stakeholders involved in addressing gambling harm have repeatedly highlighted the conflict of interest arising from the NSGC's responsibility for both gambling-related revenue generation and for oversight of the social responsibility component of provincial gambling.

Recommendation #2

Undertake an independent review to examine the mandate and scope of responsibilities and activities for the several different organizations involved in or addressing gambling in Nova Scotia.

The scope of this review could include a look at current resource allocations to ensure monies are being appropriately directed. It could also include an assessment of current mandates of all related agencies and organizations to determine that each one is in the best position to administer specific activities to meet the needs of Nova Scotia. This review can include the following groups:

- Addiction Services at the District Health Authority Level
- Alcohol and Gaming Authority
- Atlantic Lottery Corporation
- Department of Health Promotion and Protection
- Nova Scotia Gaming Corporation
- Nova Scotia Gaming Foundation

Recommendation #3

Develop a comprehensive framework for addressing gambling harm, including a public-health approach, a coordinated research agenda, measurable outcomes for prevention and treatment, and a proactive public policy agenda.

Increased public accountability and evaluation of government initiatives to minimize gambling related harm is needed as we move forward. Nova Scotia requires an effective regulatory and harm-minimization framework that ensures greater protection for consumers, greater prevention of problems, a coordinated and strategic research agenda, and a greater level of effective community-based response for problem gamblers and their families or friends who are affected by the negative effects of gambling.

Gambling problems are a public health issue and contribute to significant health and social harms. While the actual social and economic cost of gambling-related harm is still not known, we know the scope is far reaching. According to the *2007 Adult Gambling Prevalence Study*, approximately 19,000 Nova Scotians are living with a gambling problem, another 47,000 Nova Scotians are at risk of being harmed by gambling, 57,000 adults cite gambling problems among family members, and 180,000 report firsthand knowledge of someone experiencing gambling harm. These numbers represent a significant number of Nova Scotians affected by gambling harm.

A provincial problem-gambling strategy that is comprehensive, collaborative, and provides direction and recommendations to reduce harm is needed to address these issues more effectively. Renewed efforts and focus in health promotion, prevention, treatment, and enforcement would help to ensure that overlap in services is kept to a minimum, that each organization responsible for framework components is the best one to have impact in that area, and that services offerings have positive and effective outcomes.

Recommendation #4

Redefine the provincial approach to gambling, creating a Culture of Moderation

The Canadian Partnership for Responsible Gambling uses the following definition for responsible gambling: “behaviour whereby the gambler views gambling as entertainment with associated costs; sets a limit for the time and money spent and sticks to it; and recognizes that uncontrolled gambling can create problems for themselves, for others in their social network, and the community”.

The NSGC has developed an entire arm of its work around the use of this term, including responsible gambling education and prevention programs, Responsible Gambling Awareness Week, and an annual conference. For example, in October 2007, NSGC launched *The Responsible Gambler* social marketing campaign, a multimedia (television, radio, and print) program to help raise awareness about responsible

gambling behaviour and to encourage these attributes amongst those adult Nova Scotians who choose to gamble. One of the key ads features the Kenny Rogers song *The Gambler* and encourages Nova Scotians to gamble responsibly. We have heard from many stakeholders who consider this television ad to be offensive as the lyrics themselves suggest players need to know “when to walk away, know when to run.”

The above example demonstrates why the “responsible gambling” approach is flawed: it places fault for problems squarely on the individual. In other words, it can create the impression that persons have gambling problems because they were not responsible, especially when combined with the subtext: “*Didn’t we tell you to be responsible?*” This approach fails to recognize that gambling cognitions and practices that result in harm are the result of a complex range of inputs from the environment and the culture in which gambling occurs. The individual gambler is subject to a myriad of external pressures to gamble more than he or she should.

The “Culture of Moderation” approach recognizes this larger perspective and involves all parts of the gambling enterprise in effecting the adoption of moderate gambling cognitions and practices, similar to the approach used by Nova Scotia in its Alcohol Strategy. As such, it represents a “whole community” approach to preventing harm and maximizing the benefits of gambling, consistent with the principles of the public health perspective.

Such a shift in approach would require the following:

Legislation: A review of acts and regulations pertaining to the delivery and oversight of gambling in order to introduce new provisions and better align existing ones with the Culture of Moderation theme. In addition, new legislation could be examined for controlling access to online gambling in Nova Scotia and for introducing government-sanctioned online opportunities within the Culture of Moderation theme.

Regulations: A review of all existing standards that includes specific actions proposed to address areas where integrity can be improved and realized. Such improvement could take the form of changes in advertising standards as well as monitoring.

Programs: A review of existing investments in all problem-gambling prevention and treatment programs on an ongoing basis with specified outcomes for each. Evidence of effectiveness and efficiency needs to be independently verified before investing additional resources.

Funding for Service Advertising: Funds need to be increased to promote prevention and treatment services with the same level of financial commitment as the resources used to promote gambling.

Research: At the present time, there is no coordinated research agenda in Nova Scotia; each of the various organizations involved in gambling pursue their own research. HPP, Addiction Services at the District Health Authority (DHA) level, the Alcohol and Gaming Authority (AGA), the NSGC, and the NSGF have all been involved in carrying out research and it is unknown if this is the most effective use of resources. For example, the NSGF is the only arms-length

organization with a mandate to pursue research, yet it is not adequately resourced to be effective.

Independent research is key for accountability, transparency, and gaining public trust. Consideration might be given to set up a Centre of Excellence in Gambling Research to ensure all research related to gambling is coordinated, peer reviewed, and in the best interest of Nova Scotians. Other jurisdictions can provide possible models for the best possible structure.

Nova Scotia is also fortunate to have the Nova Scotia Health Research Foundation (NSHRF), which is recognised internationally for its work. One model might include looking at the NSHRF as the independent arm to oversee such a Centre with the various organizations contributing financially.

BUSINESS OF GAMBLING

This section addresses the importance of consumer protection and third-party oversight within the business of gambling.

Consumer protection

Recommendation #5

Subject all gaming products, particularly those found to present the greatest risks for harm from gambling (including VLTs and internet gambling) to a third-party review to ensure appropriate labelling is informing players of the risks associated with the game.

Recommendation #6

The risks involved in using these products should be clearly labelled on the products themselves, similar to tobacco. Providing brochures in the general vicinity of products is not enough to mitigate risk and potential harm.

Nova Scotians who choose to gamble have the right to make informed decisions. They must be made fully aware of the odds of winning and the risks of using a specific game or purchasing any product. As with tobacco, this information should be made available on the products themselves and not just placed in their general vicinity.

Currently, while available printed material contains useful information, this information is easily ignored or hidden because it is not included as part of the device (i.e. NSGC's brochures about setting gambling budgets and explaining that the outcomes of VLTs are frequently placed outside of players' lines of sight). Additionally, the material itself is

presented in a way that it does not provide full disclosure about the risks associated with playing electronic gaming devices (e.g. that electronic gambling is faster than other forms of gambling, that the features on these games can encourage players to think that they have an influence over the outcome, and that the games are designed to keep players playing longer). This type of detailed information should be clearly displayed on all machines.

The intent of the Federal Competition Act is to ensure that all Canadians enjoy the benefits of competitive prices, product choice, and quality services. Accurate and honest information on which consumers can make informed choices is essential to ensure that markets are competitive and dynamic.

According to the Competition Bureau, the Act “contains provisions addressing false or misleading representations and deceptive marketing practices in promoting the supply or use of a product or any business interest. All representations, in any form whatever, that are false or misleading in a material respect are subject to the Act.” Regarding what is considered to be material, “A representation is material if it could lead a person to a course of conduct that, on the basis of the representation, he or she believes to be advantageous.” This includes the “general impression” conveyed.”

Not actively disclosing the risks of gambling products to players both at the location of play and on the product does not appear to be in the spirit of the *Competition Act*.

Introduction of New Products

Recommendation #7

Implement a new review process, administered by a third party (one not involved in revenue generation), that is based on a precautionary principle, on best practices, and on independent research.

The NSGF recommends that a third-party review process be implemented that ensures all new or revised products are proven to do no harm before they are accepted for introduction into the marketplace. The 2009 introduction of Electronic Keno when the NSGC’s preliminary research had revealed the game would be played by “higher risk players and would be particularly attractive to VLT players” is an example where the risks were known and yet a revised version of the game was introduced.

Dr. Ed Kinley, Chair of Capital Health’s Population Health Committee, has gone on record as saying that “It seems prudent for us to consider the overall impact of new products like Electronic Keno before introducing them to the public. While assessing the environmental impact of new initiatives or projects prior to their implementation has become widely accepted in our society, health impact assessments are less common. It’s time to change that.”

In all future situations where changes to gambling products or venues are being proposed, it is recommended that a ‘precautionary principle’ should apply. The

responsibility of the Government is to ensure that new products or 'upgrades' to existing products will not result in harm. This approach is vital to the development of a responsible gambling industry.

The enactment of the precautionary principle will also require a more open approach to product development and introduction. Those involved in treatment and research must receive information about potential changes to the product mix in a timely fashion to allow for significant input into the process and the effective application of this precautionary principle.

While the NSGC's Social Responsibility Assessment template asks questions about these areas, NSGC selects its own reviewers and results are not made public. There needs to be an increase in transparency when new products are introduced as well as the "score" required to pass or fail the assessment.

Advertising

Recommendation #8

Implement a review of gambling advertising and promotion to determine if expenditures for the promotion of gambling and related advertising is in line with the Province's emphasis on social responsibility over revenue generation. Also ensure an appropriate proportion of revenue from gambling is transferred to the Province.

Recommendation #9

Implement a third-party review process of gambling-related advertising to ensure transparent monitoring of the NSGC's advertising code.

According to Statistics Canada, in 2008, Nova Scotia ranked 9th out of 11 provincial/territorial revenue groups (the three territories are combined) for percentage of revenues transferred to government. At 44.1%, Nova Scotia is only one of three provinces that receive less than 50%. This result is determined from a percentage calculation from Statistics Canada's data comparing total provincial revenue from wagers on government-controlled lotteries, casinos and VLTs (minus prizes and winnings) with the net income of provincial governments from total gambling revenue (less operating and other expenses).² While provincial gambling operators' costs vary, the general comparison suggests that Nova Scotia's gambling operations may not be as efficient as they could be. For a table summary of the comparison and rankings by province, please see the annex to this report. Because cost of sales is so high (according to the NSGC's annual reports), a review of advertising expenditures could reveal inefficiencies in the system.

² From "Perspectives on Labour and Income: Gambling," *Statistics Canada*, July 2009.

Additionally, the NSGC's advertising standards, developed as part of its social responsibility mandate, have been developed and monitored internally. To develop, follow, and monitor standards within one body is not considered best practice: to ensure appropriate standards are met, monitoring of all gambling-related advertising should be delegated to an independent third party. For example, there was public concern expressed by stakeholders when NSGC featured young athletes in a Support4Sport advertising campaign. In addition, the website created to promote this program also features young athletes. While the NSGC defended the ads, stating that they were designed to promote the Support4Sport program and not the product, had the ads been subject to a third-party review they may not have been approved from the outset.

PREVENTION AND TREATMENT

Recommendation #10

Transition prevention activities related to gambling away from the NSGC and redirect all funds currently allocated to those activities to other government programs or agencies with the mandates for gambling prevention. This will increase source credibility and allow activities to be validated with evidence and outcomes to determine impact.

Involvement of gambling operators or management in the promotion and protection of public health is a potential conflict of interest. The involvement of NSGC programming in schools and universities, the organization's involvement in adolescent programming, and its support for prevention poses a significant conflict of interest. Just as tobacco companies are prohibited from sponsoring athletic events for youth, gambling-prevention programming should be removed from the purview of the NSGC.

Over the past five years, both the Department of Health Promotion and Protection (HPP) and the NSGC engaged in prevention work. HPP has a specific mandate to address health-related prevention, and its mandate "spans all aspects of public health, physical activity, sport and recreation, addiction services and volunteerism," while the NSGC "is responsible for the business of gaming in Nova Scotia." These conflicting mandates highlight the reason that the NSGC should not be involved in prevention work: gambling prevention programs are at odds with its own mandate and create a conflict of interest between the 'social responsibility' and 'revenue-generation' components of provincial gambling.

These conflicts reduce or eliminate the "source credibility" of the prevention programs. The credibility of an organization producing programming or products is a necessary criterion for all prevention, treatment, and social responsibility activity. The industry's role in these activities can create perceptions of insincerity in the eyes of the public and undermine the possibility of any beneficial effect.

Specific examples of the NSGC's involvement in prevention-related activities include the production of dramatic plays for high-schools, the *Responsible Gambler* awareness program, the *Mobile Access to Responsible Gambling Information (MARGI)* kiosks, etc. An additional concern surrounding these initiatives is they do not appear to be monitored for impact, they are not necessarily based on best practice for prevention models, and they are not always subject to research-based review. For example, while the NSGC's Responsible Gambling Awareness Week may have a good intent, the organization responsible for generating revenue is also determining the presentations and information provided on Responsible Gambling (which is itself an industry term that has specific moral judgements included within it). In contrast, the *Yellow Flag* campaign developed by HPP was reviewed and evaluated by third-party researchers. Data collection indicated high ad recall, with 79.6% of young adults indicating a preference for providing more ads of this nature and a similar percentage agreeing that such ads are helpful in letting people know about risks when gambling.³

Recommendation #11

Review and expand existing treatment options to meet the needs of the over 90% of problem gamblers who are currently not accessing treatment.

According to the *2007 Adult Gambling Prevalence Study*, only 9.8% of problem gamblers actively sought assistance for their gambling, and while 23.4%, or 180,000, Nova Scotians reported knowing someone with a gambling problem, the majority did not contact an agency or service for assistance. Additionally, those who did reach out for help were just as likely to go to their family doctor as to seek help through Addiction Services, Gamblers Anonymous, or the Problem Gambling Helpline.

Current treatment options, while available for those who seek them, are not meeting the goals of the original Gaming Strategy because they are not being accessed by the majority of people who need them. Addressing this issue could involve the provision of more resources as well as more emphasis on alternative treatment options. Some examples could include, but are not limited to, online support, funding for community organizations to assist problem gamblers in a cost-effective and accessible manner, etc. Once again, a review of best practices in alternative or new forms of treatment options should be carried out to better serve the needs of Nova Scotians experiencing harm from problem gambling. Regardless of methods chosen, all treatment programs should be based on best practices, include various treatment modalities, consider gender and cultural diversity, and be subject to ongoing evaluation to determine successes and barriers so that these services actually meet the needs of their clients.

One method of addressing these issues is to create a time-limited panel to develop an integrated treatment approach for Nova Scotia. This panel could recommend the "clinical architecture" for treatment approaches, the delivery model for province-wide service

³ From *2007 Yellow Flag Post-Campaign Evaluation among Young Adults 19-34*, Nova Scotia Department of Health Promotion and Protection, October 2008.

(including online options), and a multi-service client tracking and system-improvement component.

Existing treatment options should also be evaluated on their outcomes. Millions of dollars are being spent on treatment; however, the impact is not known. It is important for Government to know if treatment resources are of benefit; therefore, treatment services should be evaluated to determine whether or not they are meeting measurable outcomes. Evaluations would educate managers and service providers about potential barriers and offer opportunities for improvement.

NEW AND EMERGING TECHNOLOGIES

Internet Gambling

Recommendation: #12

Conduct a review of the existing and emerging trends in internet gambling, including associated harms, before embarking on any expansion as a source of revenue generation.

The Honourable Graham Steele's statement regarding the new Gaming Strategy states that "The Internet is undeniably the biggest influence in the industry today....This is something that needs to be reviewed with a continued focus on economic sustainability and social responsibility. Ignoring it is not an option."

The NSGF agrees that issues such as the number of unregulated online-gambling sites is of great concern and necessitates the need for a regulated form of internet gambling and a precautionary approach for Nova Scotia.

However, while the expansion of internet gambling is occurring, evidence as to its popularity or demand in Nova Scotia does not yet exist. The *2007 Adult Gambling Prevalence Study* states that "only 1-2% of adults have ever been PlaySphere members" and "there continues to be no natural gambling market for the internet" in Nova Scotia. At the same time, of those players who had tried internet gambling, about 1 in 20 (4.9%) reported developing problems, which is almost identical to that for VLTs (4.7%). The precautionary approach would suggest that Nova Scotia should "wait and see" what the results of increased internet gambling in other jurisdictions are before introducing and/or increasing its use here. Other jurisdictions can serve as models to determine effects before deciding on an appropriate strategy for Nova Scotia.

Similarly, strategies used to reduce internet gambling can also be examined. This approach could involve a review that includes examining technological approaches to blocking Nova Scotia residents from gambling on out-of-province internet sites. This strategy could prove effective in restricting Nova Scotia dollars from flowing out of the province and possibly allow for the adoption of mechanisms to monitor activity and

prevent problems (similar to the My-Play System for VLTs). Another alternative to addressing the issue of revenue leaving the province while harms remain is to review the policy adopted in the United States to target financial institutions that transfer money to offshore gambling sites. This has resulted in many offshore sites refusing bets from American consumers and the creation of software to exclude American players. While the NSGF is not recommending any one particular alternative method of reducing offshore gambling use, these examples are highlighted to demonstrate that alternatives do exist.

My-Play System

Recommendation #13

Make the My-Play System “universal,” requiring all players to use a card for all VLT play, and expand the capabilities of the system to allow clinicians access to player information as part of a treatment program.

A final decision has not been made as to the mandatory use of the My-Play system beyond its trial period. Given that VLTs pose the greatest and most serious form of gambling harm for Nova Scotians, (the *2007 Adult Gambling Prevalence Study* reports that 1 in 4 adults who play VLTs on a regular basis report problems), mandatory application of the card could prove to be highly effective as a method of harm reduction. Potential expansion of the system to slot machines in casinos could produce additional benefits to mitigate risk.

Features such as play limits and self-exclusion are existing features of the current system. However, normative feedback, in which an individual’s behaviour is compared with “group norm” behaviour, is recognized as a tool for promoting positive behaviour change. Mandating required use of the My-Play system and adjusting it to provide normative feedback, in which individual gamblers’ play is compared with VLT player “norms” of play, would provide players an opportunity to learn that their behaviour is considered to be at risk of becoming problem gambling behaviour. The information could be provided (either on a personal computer or during discussions with clinicians) to the individual gambler as a caution, along with suggestions as to how he or she might make changes to regain and/or maintain moderate play behaviour.

Additionally, ongoing monitoring and exploration of the My-Play system is recommended. Studies such the one commissioned with Focal Research by the NSGF are important for determining the effectiveness and best use of the system. The current study has generated a panel of regular VLT players across Nova Scotia to establish pre-trial benchmark measures before the My- Play system is widely introduced in order to assess impact once the card is rolled out. Further research plans include studying the card as a means to support at-risk and problem gamblers.

ADDITIONAL RECOMMENDATION

Recommendation #14

Rename the new Gaming Strategy from a “Responsible Gaming Strategy” to a “Strategy for Moderation in Gambling” or a “Gambling Strategy.”

The word “gaming” has many different connotations. It is often used as a euphemism for gambling, it refers to video game culture, and it has strong associations with hunting. The use of the title “Responsible Gaming Strategy” does not, therefore, adequately reflect the intent of this document.

CONCLUSION

The Nova Scotia Gaming Foundation is committed to working with Government to ensure the 2011-2016 Responsible Gaming Strategy is built on best practices, is comprehensive and transparent, and is designed to protect Nova Scotians from potential harm from gambling. We recognize that gambling provides an important source of revenue for the province and would like to see a renewed approach to gambling that uses a public health lens, which is important for reducing harm and gaining the trust and respect of all Nova Scotians.

Respectfully submitted,

Nova Scotia Gaming Foundation

ANNEX
GAMBLING REVENUES AND PROFITS, 2008⁶

Jurisdiction	Gambling Revenue ⁴	Gambling Profit ⁵	Turnover (percent)	Rank
Canada	13,926	7,144	51.3%	
Newfoundland and Labrador	197	99	50.3%	8
Prince Edward Island	46	16	34.8%	10
Nova Scotia	324	143	44.1%	9
New Brunswick	219	129	58.9%	3
Quebec	2,790	1,539	55.2%	6
Ontario	4,841	1,680	34.7%	11
Manitoba	645	358	55.5%	5
Saskatchewan	641	325	50.7%	7
Alberta	2,254	1,759	78.0%	1
British Columbia	1,962	1,089	55.5%	4
Yukon, NWT, Nunavut	9	7	77.8%	2

Nova Scotia Analysis: If Nova Scotia were to match the highest turnover rate (78 %, in Alberta) its profits would increase from \$143 Million to \$253 Million, an increase of 77%. This suggests that, in not matching the Alberta turnover Rate, the Nova Scotia public is losing \$110 Million in revenues.

⁴ \$ Millions (current)

⁵ Net income of provincial governments from total gambling revenue, less operating and other expenses

⁶ Source: Statistics Canada, Perspectives on Labour and Income; Gambling, July, 2009. For a more in-depth analysis and commentary, please see the *Canadian Gambling Digest 2008-2009*, found at http://www.cprg.ca/articles/Canadian_Gambling_Digest_2008-09.pdf