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INTRODUCTION – “WHO WE ARE”

I welcome the opportunity to communicate with all of you and thank CFCG for providing the format to share informed citizen priority concerns. I am, at present, the Central Communication Contact for OCAGE – the Ontario Coalition Against Gambling **EXPANSION**. Having said that, it is necessary to outline what we **support**. Our 6-POINT PLAN states clearly what OCAGE advocates as essential to meet **public interest** criteria.

- OVERHEAD 1 – 6 POINT PLAN -

1. A Moratorium on further gambling expansion PENDING:
 - a) Independent studies on the social, economic and legal impacts;

INTRODUCTION – “WHO WE ARE” *(continued)*

- b) A standard public consultation process;
- c) Local veto and regulatory authority;
- d) Public education and disclosure of odds and risks; and
- e) Government regulations and accountability, plus limits on gambling promotion.

As this PLAN indicates, our citizen network is, like many, “gambling neutral”. However, we are **not** gambling policy neutral, nor are we obliged to be so. It is in this capacity that I address you today.

My presentation will:

- A. Provide an Ontario background overview;**
- B. List immediate key citizen concerns with Canadian, indeed global, relevance; and**
- C. Provide recommendations and requests to address immediate public interest needs.**

Citizens should not have to be in a position to advocate on this issue on their own. This is a public policy, which has clear public health implications. This is noted both in the CPHA (Canadian Public Health Association) 2000 Report “Gambling Expansion in Canada: An Emerging Public Health Issue”, with formally adopted Resolutions, and the alPHa December 1999 Report, “A Public Health Perspective on Gambling in Ontario”.

Therefore, the goal is for OCAGE to be a catalyst for:

- a) **inclusion of citizens as key stakeholders in gambling policy direction;** and
- b) **shared ideas, which can start to provide required consumer protection and informed consent.**

These goals cross **all** geographic boundaries.

INTRODUCTION – “WHO WE ARE” *(continued)*

A. SUMMARY – ONTARIO BACKGROUND OVERVIEW

As a volunteer, non-partisan network, OCAGE originally formed about four years ago at the onset of the original provincial government plan to install EGM's and tables in 44 described “charity” casinos, EGM's in racetracks and in licensed establishments. Approximately 20,000 machines were proposed in total.

Since that time, EGM's (which are at present reel and video slots) at the local community level have expanded dramatically. Once the newest “charity” casino is running in Eastern Ontario, just under 12,000 new slot machines will be based in communities at racetracks and “charity” casino locations. In thirteen racetrack locations, zoning for slots took place as a result of 13 Provincial Ministerial Zoning Orders (MZO's), not by broad local citizen referendum. In summary, the total number of Ontario EGM's will have increased by approximately 1,000% since 1995.

- OVERHEAD 2 – EGM EXPANSION ‘1995-2000’ -

This total by Spring 2001 will equal approximately 20,000 slots. The present “hold” on further slot expansion is only temporary.

As well, other types of gambling products and advertising promotions have also been expanded.

However, the present placement of very large numbers of EGM's (slots) is a **fundamental shift in local access to rapid electronic gambling.**

A. SUMMARY – ONTARIO BACKGROUND OVERVIEW *(continued)***PRESENT FOCUS – “WHY ARE WE ADVOCATING ABOUT GAMBLING ISSUES?”**

You could well ask, since a significant expansion of gambling has occurred – even with documented, and ongoing, citizen opposition – why am I here? That is a valid question.

As advocates for the public interest, it is OCAGE’s position that the need for public awareness and truth-in-advertising has never been greater. A citizen voice is also needed, as Professional service providers and researchers are funded through the Ministry of Health for gambling related issues. It is understood that this limits their roles as **public** advocates for and/or against gambling policies. This has placed the public, still largely uninformed, in the primary role of **public** advocacy about specific gambling policies. The task is daunting, as there are no common National resources and no funding provided. Yet conflict of interest issues have to be objectively addressed, as governments promoting and expanding gambling are also taking the role of regulator. **Who is looking after the public interest?**

B. KEY CITIZEN CONCERNS – “WHAT ARE OCAGE CONCERNS?”**- OVERHEAD 3 – KEY OCAGE / CITIZEN CONCERNS -
- SUMMARY POINTS -**

- a. To date, a **broad, media-based, Ontario-wide public awareness and education program has not yet been completed**. We understood that this was planned and ready to launch in September 2000. This was a necessity to:
address consumer protection; help prevent any negative impact of gambling

B. KEY CITIZEN CONCERNS – “WHAT ARE OCAGE CONCERNS?” *(continued)*

expansion; and provide opportunity for informed citizen choices about local gambling expansion. (Examples – Ajax and Eastern Ontario in November 2000 municipal elections had ballot votes on slot and casino expansion.) The public does not know that documented at-risk groups also include women, seniors, cultural groups and those with concurrent disorders.

- b. To date, **government owned advertising, comp systems, and promotion of gambling contains minimal or no cautionary messages**. There are no legislative caps on these advertising budgets. (Note – the “Brand Marketing” budget for the Ontario Lottery and Gaming Corporation for 1999/2000 topped \$39 million.) Advertising does not appear to address the full guidelines of the Canadian Advertising Standards, a benchmark standard for truth-in-advertising.
- c. Clear warnings from Canadian and global researches indicate the extent of **problem gambling associated with current youth and adolescents** (2 to 4 times adult prevalence rates). Yet, to date, youth-based education about problem gambling has not been incorporated into Ministry of Education **core curriculum programs**. OCAGE notes this as a high priority concern.
- d. **Base-line community data** of cost/benefit **impacts** of gambling, and its expansion, is necessary to monitor overall community quality of life issues. However, in Ontario the original government documented plans (a RFP was issued in the fall of 1998) to do formal Impact Studies in racetrack slot communities were not carried out. Only one racetrack slot location is included because it is very close to a “charity” casino, and is part of its Impact Study. All Ontario (and Canadian) communities have a right to a **standardized**, arms-length **funded** assessment of gambling impacts. **Critical is the right of citizens to public access to all of the data collected**. There should not be a government option to release selected data.

B. KEY CITIZEN CONCERNS – “WHAT ARE OCAGE CONCERNS?” *(continued)*

- e. **Gambling technologies are evolving rapidly.** Governments are expanding EGM options:
 - i) Without obligatory prior consultation with researchers and addiction professionals to address risk considerations; and
 - ii) Without a process for required public legislative debate or approval.

For example, the Ontario Lottery and Gaming Corporation has already placed what it is calling “interactive slots” in at least two “charity” casinos and two racetrack slot locations. The plans are to continue this at the “remainder of the charity casinos and racetrack slots... over the next several months”. These machines are video slots and will “offer a variety of games ranging from Poker to Wheel of Fortune”. The rationale stated is “market demand”, not Ontario citizen request. This movement to EGM’s of higher animation, and possible illusion of skill, is occurring even before the completion of Phase I Impact Studies of all Charity Casinos. No Ontario-wide approval was requested or required; no public announcement of this change was noted.

SUMMARY OF KEY CONCERNS

These are only five prioritized points. Of course, other areas require attention in the short-term.

I will now outline OCAGE requests and recommendations. This is necessary because positive action to address key concerns will provide some consumer protection and informed consent. **We stress that there are no guarantees that containment of problem gambling is going to result.**

SUMMARY OF KEY CONCERNS *(continued)*

Current Ontario, Canadian and global credible research does **not** support the assumption that problem gambling only affects a small **number** of people (**current** estimated adult Ontario pathological gamblers – approximately 99,000; **current** estimated adult Ontario problem gamblers at risk – approximately 242,000; each gambler in trouble affects approximately 5 to 15 others).

Ontario citizens have to leave behind \$850 million annually in track and “charity” casino slots to generate \$17 million for Rx, research and education. Given the number of Ontario adults already in difficulty with gambling, this sum works out to about \$50 for each adult person in order to fund all of these areas. This adult allotment of \$50 does not take into account dollars funneled to youth issues. It’s essential, therefore, that these public dollars have maximum impact.

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS”**- OVERHEAD 4 – REQUESTS AND RECOMMENDATIONS BY OCAGE – “HOW” -
- SUMMARY POINTS -**

1. **All gambling advertising, comp systems, and promotional material and displays should include educational and cautionary information.** Also, The Problem Gambling Helpline should be prominently included. Problem Gambling Helpline data Nationally needs to be publicly accessible through the media on a regular basis.
2. **Prevention and education messages** should not be isolated from advertising by Crown Corporations and government Ministries promoting

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS” *(continued)*

- gambling. It should be an **integral part** of advertising and promotional material.
3. Advertising of gambling should **not send messages implying that it is a citizen’s civic duty to gamble** for charitable purposes, or for health care needs. Health care is funded as a core service through consolidated revenues. Therefore, messages that also imply that “everyone is a winner” mislead the public. Even Canadian charities and not-for-profits are concerned about their “dependency” on gambling funded dollars. The Canada West Foundation’s December 2000 Report: “The Ethics of Charitable Gambling: A Survey” states that “Ethical issues linked to harmful effects of gambling are a fundamental issue for Canadian charities”.
 4. **Nationally, advertising codes** for government gambling advertising can be enshrined in legislation. Budgets can be capped or equated to dollars funded to problem gambling services. “Blue prints” for balanced advertising which reflects “truth-in-advertising” are available. They include, as examples:
 - i. The US National Gambling Impact Study Commission Report – Chapter 3, under ‘State Role’ and ‘Advertising’ – including Lotteries.
 - ii. “Best Practices” for... Advertising and Marketing from the American Gaming Association – Appendix, in US National Study, 1999.
 - iii. The NASPL Advertising Standards – Appendix, US 1999 National Study.
 - iv. The 1999 National Australian Study; Volume 2; Consumer Protection.

Retail and not-for-profit partnerships with Lottery Corporations should be reviewed. A team approach with professionals and researchers could ensure that:

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS” *(continued)*

- a) the **same** expectations for informed consent and consumer protection are expected of the retail partners and licensed charities plus not-for-profit groups; and
 - b) all partners are informed of the ramifications of promotions that do not meet this criteria.
5. In Ontario, and across Canada, all gambling expansion should be accomplished by an **open transparent process**, which does **not involve** the use of **Provincial Ministerial Zoning Orders (MZO's)**. As gambling expansion will have long-term significant effects on our communities, we would submit that MZO's can deny local input and circumvent the normal local democratic process through the Municipal Planning Acts. Not using MZO's avoids favouring any special interest over the broad public interest.
6. **Independent arms-length Impact Studies** should be a requirement in any region affected by gambling expansion, particularly of local rapid electronic gambling. All data should be fully accessible to the public. **Studies need a National Standard framework.** Data on this issue was addressed by the Canadian Centre on Substance Abuse – at the Whistler Symposium, September 2000 called “The First International Symposium on the Economic and Social Impact of Gambling”. Standardized studies would provide citizens with evidence-based foundations for long-term planning.
7. **Youth and adolescent education and prevention programs about gambling issues should be incorporated into core curriculum programs of Ontario – and Canadian – schools.** Active parent involvement should also be an integral part of this education. Active involvement of front-line youth workers is a parallel need. Math programs can include general

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS” *(continued)*

- education about probability and odds, without focusing on gambling per se. Gambling awareness could be incorporated into existing core program material addressing other substance abuse and health issues.
8. We would ask professionals in the gambling field to **clarify exactly for the Canadian public what they mean by the term “gambling neutral”**. The public could **presume** that professional “neutrality” is based on the assumption that, on reviewing credible gambling research, you also concur with all government gambling policy. Citizens need to understand why they are advocating **publicly** largely on their own, about specific gambling policies.
 9. **Messages by government to citizens about gambling use require maximum accuracy.** For example, visits to local casinos/slot operations that are government publicized should indicate trips or visits, not patrons, as there is no method of counting **repeat visit frequency**.
 10. **Growing databases on gambler patterns with electronic gambling are collected by our Ontario government through promotional systems such as slot card clubs.** One is called the “Winner’s Circle”. As these cards can be used at all track slot location and “charity” casinos – there is information now on patterns of age group use, gender use, frequency patterns, etc. **These general patterns should be accessible to researchers and the public**, to help accurately prioritize specific group education needs. Why would such general data not be available?
 11. **We would ask all Service Providers and Researchers** working in the gambling/problem gambling field to consistently **use actual people numbers affected** rather than use phrases such as a “small percentage”. It would

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS” *(continued)*

better educate a still largely uninformed public. We ask that you all also consistently address the known secondary “ripple” effect on approximately 5 to 15 others. The long-term, sometimes “devastating” effect on significant others is anything but “small”.

12. We would particularly ask that all research consistently be presented to the public in a full cultural context. Therefore, **OCAGE asks that any research not focus purely on a “medical model”** approach. It would be **inaccurate to only assume dysfunction within the gambler and/or his family** – without noting also:
 - i. The gambling advertising in his/her environment;
 - ii. The accessibility factors, especially to rapid electronic gambling; and
 - iii. The existence and duration of school, plus public, education and prevention programs about gambling.

Without addressing this cultural context, it would not appear possible to reflect balanced research. We have learned to be cautious about assuming the problem simply lies with pathology of the individual – for example, with smoking.

13. **The Ontario, and Canadian, public need to monitor the addictive risks of evolving new gambling technologies.** Legislative decisions should be required; Crown Corporations involved with government regulated/promoted gambling need external regulatory control over where they place new EGM’s, what type is used, and what numbers of EGM’s are permitted. “Market demand” in no manner addresses informed decisions in the long-term public interest.

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS” *(continued)*

14. **There is a need to get the “mountain” of existing research data out to the public. Therefore, we ask researchers to consider the immediate value of developing a Provincial and/or National media policy.** This would allow your traditional publications in Journals, etc. to be reformatted for the public on a regular basis. A team approach could be a catalyst for a National approach to **connecting with the media at many levels**. Broad-based Press Releases would increase national awareness. Without this consistent connection to regular media, the public continues to be in an ongoing “catch-up” position. People do not realize there are even general issues to address, or what questions they should be asking. An example is the December 1999 alPHa Report: “A Public Health Perspective On Gambling In Ontario”, by the alPHa Task Force on Gambling. It contains solid recommendations for a public health framework for community monitoring of gambling impacts. Even if this is a subject not chosen, at present, for Core Mandatory Programs of Public Health (OCAGE takes the position that it **is** a present priority) this is a public document. However, there was minimal citizen awareness of its existence.

There is so much credible research which is on record, but not making it into the public domain. The public could be expected to ask in the future why they did not receive necessary information in a timely manner.

15. **Public presentation resources for service providers (in the gambling addiction field) should not be required to include content which, in isolation, appears to support any government rationale for gambling/expansion.** At the very least, if such material is included, it should also fulfill the criteria for “gambling neutrality”. In other words, any documentation would also need to include specific statements

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS” *(continued)*

reflecting balance. For example, this could include references to credible global research currently recommending moratoriums on gambling expansion pending further independent impact studies.

16. **Rapid electronic gambling machines, EGM’s, should require (by government regulation) inclusion of software to provide “harm reduction” options to gamblers.**

These software programs can include “point of use” choices to access:

- lists of problem gambling warning signs;
- options to limit time and/or money spent;
- steps to safer gambling;
- self-assessments for problem gambling risks; and
- ways to access help.

*In Eastern Canada, a Lottery Corporation has already requested information in its new EGM’s that include some of these options listed.

*In Australia there are also new regulations requiring more natural light on gambling floors, and clocks on the front of EGM’s.

Since, in Canada, the “gambling industry” is the Federal and Provincial governments, these steps would reflect action to commit to steps to reduce harm.

17. **Canadian, indeed global, commitment to move to RAISE THE LEGAL GAMBLING AGE TO 21.** There continues to be widespread public lack of

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS” *(continued)*

awareness of current youth and adolescent problem gambling prevalence and risks. This includes parental lack of awareness of this immediate concern. Therefore, raising the legal gambling age would provide more time for prevention education to be repeated in schools, in media, and through in-home mailings (as done recently in Ontario about children and second-hand smoke issues).

18. **The National Council of Welfare** 1996 extensive Federal Report: **”Gambling in Canada”** listed a number of specific recommendations in its final chapter. This chapter is titled “Conclusions and Recommendations”. Recommendation #4 **advised that 10% of government net gambling revenues** (collective citizen losses) **should be directed toward prevention, education, and treatment of gambling problems.** That percentage is approximately 5 times the current Ontario allotment of 2 cents for every citizen dollar left behind in local slot machines.
19. **Credible National Studies**, (including the US 1999 National Gambling Impact Study Commission Final Report) **advise removal of ATM’s from easy access to “gaming” floors.** This is seen as particularly relevant where there are EGM’s. Rapid game cycles can result in large losses within a short time frame. Ready access to withdrawals can facilitate “chasing losses” behaviour.

As well, spouses could be completely unaware of withdrawals from joint accounts that can result from a partner’s possibly unknown gambling problems. Even if that partner is accessing problem gambling counselling, those service providers cannot include spouses in treatment without written

C. OCAGE REQUESTS AND RECOMMENDATIONS – “HOW TO ADDRESS CITIZEN CONCERNS” *(continued)*

consent from the client. Therefore, those at significant risk from these known “ripple” effects require reasonable protection as well.

20. **Self-exclusion programs currently operating in community and destination style EGM locations (casinos, track slots, etc.) should be publicized in the media and clearly posted on “gaming” floors.** Gamblers should not have to wait until they are in difficulty before they are aware of their options. No gambler should need to go through a casino to sign for self-exclusion. Citizens should know that all casino/slot location employees have been specifically educated to recognize gamblers in trouble, and that there is a policy in place to deal with these issues. Examples of employee/employer legal responsibility in such areas already exist with, for example, serving of alcohol and sale/use of cigarettes.

SUMMARY OF REQUESTS AND RECOMMENDATIONS SECTION

As long as our own Canadian governments are advertising and promoting gambling in such a way as to:

- shape the cultural context in which National gambling occurs; and
 - contribute powerful conditioning messages in which gambling choices occur ,
- then it is reasonable to expect governments to accept responsibility to reduce and prevent problem gambling’s harm. **They can start to do this by acting on these outlined citizen concerns.**

CONCLUSION

Studies, including the National US and Australian 1999 Reports, recommend moratoriums on gambling expansion pending further study of impacts. **Credible research nationally and globally still does not support the assumption that continued expansion is in the “public good”**. However, at present, there is little **CONCLUSION** *(continued)*

opportunity for local dismantling processes for expansion of government gambling. Citizens have to exert enormous effort against proponents with far greater financial resources – to oppose or reverse any gambling expansion. They have limited options over what is sometimes defined as a “social experiment”. Yet the public has minimal or no option out of the “experiment”. Effects of impacts now will, realistically, affect us at least into the next generation.

It is increasingly evident globally that citizens are no longer content to remain passive about this public policy. **The public will expect to have accountability issues addressed, and all the criteria for informed consent and consumer protection met.** Those expectations around accountability will also be addressed by all those affected by problem gamblers. This, of course, will increasingly include parents.

The latest issue of CFCG’s “Newslink” contained an article by Prof. Durand Jacobs, Ph.D., ABPP. Its last paragraph states, “...findings reveal that the dominant long-term trend is a progressive increase in the amount of Serious Gambling Related Problems reported by juveniles in Canada and the United States”. The time for passivity and lack of awareness about this issue is long past.

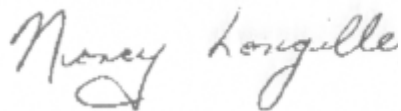
Governments are dealing now with pressures to relax regulations and/or add evermore exemptions to the Federal Criminal Code. Why? In part, so that they can compete for revenues, and/or control the new “gambling kid” on the block – internet gambling. Where ARE we going, and NOW WHAT?

CONCLUSION *(continued)*

I will end with a quote from writer-philosopher Mr. John Ralston Saul, from the Bill Duthie memorial lecture, delivered at the Vancouver International Writer's Festival. This lecture was reprinted in the Canadian Fundraiser Newsletter, February 1997, Volume 7, No. 4. "I don't understand why there is no real, serious debate about state sponsored gambling in our country. Where are the intellectuals and the tenured professors and the social scientists and the writers? Some are speaking out, I know, but I'm talking about the great weight of this enormous group of people concentrated on the subject. Where are they?"

We're here, Mr. Saul. We're informed and concerned citizens. This is just the initial whisper of the "great weight of this enormous group". Stay tuned.

Thank you for listening.

A handwritten signature in cursive script that reads "Nancy Langille". The ink is dark and the handwriting is fluid and personal.

Nancy Langille, Member and Central Communication Contact – OCAGE
(Writing and speaking on behalf of OCAGE).