Navigating the Waters: A Strategy for Socially Responsible Gambling on PEI

PEI Lotteries Commission

2023-2028
# Table of Contents

Background to the Strategy ................................................. 1
Environmental Scan: Trends and Topics .............................. 2
Introduction to the Strategy .................................................. 3
A Strategy for Socially Responsible Gambling .................. 4
1: Safe, Healthy and Positive Play .................................. 4
2: Increased Literacy Around Safer Gambling .................. 4
3: Balance Access with Player Protection ....................... 4
4: Inclusive Programs and Services .................................. 4
5: Minimize Harms from Gambling .................................. 4
Acknowledgements .............................................................. 10
References .............................................................................. 11
Strategy, Methodology and Engagement List ..................... 12
Appendix A: Implementation Guide .................................. 15
Appendix B: Relationship Structure of Province of PEI and the Atlantic Lottery Corporation ................................. 21
Appendix C: History of PEI Harness Racing ..................... 22
Foreword from the Honourable Jill Burridge

On behalf of the Government of Prince Edward Island, and as Chair of the PEI Lotteries Commission, I am pleased to present *Navigating the Waters: A Strategy for Socially Responsible Gambling on PEI*.

The gambling landscape has shifted considerably in the years since PEI released the first responsible gambling strategy in 2008. While there are ongoing efforts to support people who experience gambling harms, there are also a multitude of new gaming products in the global marketplace. To ensure existing programs and services are able to respond to these emerging demands, Government initiated an update of its strategy to ensure the products it authorizes are socially responsible with appropriate harm minimization features and supports.

The work on this new strategy was conducted by independent consultant, MRSB. They engaged with mental health and addictions professionals, government partners, commercial stakeholders such as the harness racing industry, and those who are most affected by gambling within the general public. A series of virtual meetings and online surveys allowed the public to share input, with specific surveys launched to consult with groups that offer charitable lottery games on the Island.

This strategy will chart a new course for gambling in this province – one that will guide gaming products and services for the people of Prince Edward Island over the course of the next five years. The five priority actions of this strategy will promote **Safe, Healthy and Positive Play**, **Increase Literacy around Safer Gambling**, **Balance Access with Player Protection** and provide **Inclusive Programs and Services** that together help **Minimize Harms from Gambling**.

I would like to thank the many organizations and individuals who contributed to this update.

We have a solid plan in place, with timelines and the means to measure outcomes. Government commits to continue working with stakeholders and partners to achieve the outcomes laid out in this strategy.

Sincerely,

Jill Burridge
Minister of Finance
Chair of the PEI Lotteries Commission
Background to the Strategy
Some of the earliest days of gambling in 20th century Canada date back to 1910 when an amendment was added to the *Criminal Code of Canada* allowing pari-mutuel betting (a type of wagering that involves the losers’ stakes being divided up by the winners). The amendment also permitted some games of chance where profits were used for charitable or religious purposes.

The Federal Government of Canada officially legalized gambling in 1969. Over the next two decades, the *Criminal Code* saw sweeping changes allowing governments of a province to conduct and manage a lottery program in their province.

In 1976, the *PEI Lotteries Commission Act* was passed, establishing the PEI Lotteries Commission as the body responsible for conducting and managing lottery programs or pari-mutuel betting systems. The four Atlantic provincial governments established the Atlantic Lottery Corporation (ALC) to offer regulated lottery games to people in the region.

Today, revenue from the PEI Lotteries Commission (net profits from ALC, including the two Red Shores facilities) supports the harness racing industry, and provides direct financial support to the Department of Health and Wellness's Gambling Support Unit to develop and oversee harm minimization gambling initiatives including research, policy, education and a 24/7 gambling support line (1-855-255-4255). These are in addition to the gambling harm reduction initiatives offered through ALC and Red Shores.

The remaining net profits from the Commission are paid into the Operating Fund of the province and are used to support various government programs and services that benefit everyone on the Island. In fact, in 2020, over 55% of total government program spending was in the Departments of Health and Wellness and Education and Life-Long Learning (Volume 1 Consolidated Financial Statements, 2021). By category of expenditures reported by government departments in 2020-2021, 30% was spent on payments such as social assistance, labour market funding, daycare funding and other grants (Volume 1 Consolidated Financial Statements, 2021).

The Commission is focused on its responsibility to conduct and manage lottery programs on behalf of the Province of Prince Edward Island. As gambling carries inherent health and social risks, the Commission recognizes the importance of minimizing harm to the people of this Island and encouraging informed and healthy play.
Environmental Scan: Trends and Topics

This strategy is founded on knowledge of the current environment and empirical evidence related to trends and issues in health, gaming and social responsibility.

The Island's first responsible gambling strategy launched in 2008. In many ways, the people of PEI are now living in an entirely new era.

Not only has digital and online activity been growing at warp speed since the late ‘90s, but the COVID-19 global pandemic has also led consumers into an increasingly digital space. New opportunities now exist for digitally supported gambling products and player data analytics.

The harm minimization field of gambling research is also reaching new frontiers. The Canadian Centre of Substance Use and Addiction recently led the development of the world’s first Lower-Risk Gambling Guidelines. Canadians now have guidelines to make informed decisions about their gambling.

The options people have for gambling are also changing. In 2021, the Government of Canada decriminalized single-event sports betting and online casino-style gaming continues to grow widely. Websites such as bet365 and JackpotCity dominate the online gaming market, despite being operated by offshore companies with no authority to conduct and manage lottery programs in PEI. It is estimated that more than $100M leaves the Atlantic region each year for unregulated and illegal offshore gambling sites, which are not required to provide harm minimization features and promote healthy play behaviours.

Gambling prevalence data for PEI was collected recently, revealing that 9% of people on the island are at risk of some level of harm from gambling (Standing, Kydd, & MacDougall, 2019). The study also provides data points and insights related to gambling participation and gambling risks on PEI. The Island’s population continues to grow, with a vibrant cultural diversity. It is important that gambling harm reduction measures, policies and programs are culturally informed and include culture-specific or targeted considerations.

Problem gambling is gambling that creates harms for individuals, their families and beyond. This strategy includes evidence-based approaches to reduce the risk of gambling harm to all population segments on Prince Edward Island.
Introduction to the Strategy

NAVIGATING THE WATERS

The PEI Lotteries Commission will use this strategy to navigate between the promotion of public health and the responsibility to conduct and manage lottery programs in PEI. In carrying out this work over the next five years, the Commission and those it directs or authorizes to operate gaming will be driven by five guiding principles:

**Harm Reduction**
Choosing actions that seek to reduce the health and social harms associated with gambling

**Accountability**
Maintaining transparency in governance and financial contributions for the public good

**Informed & Healthy Play**
Players and providers of all games value gambling literacy and lower-risk behaviours

**Equity & Inclusion**
Programs, services and opportunities recognize different needs and are accessible by everyone, with considerations for cultural differences in gaming and incorporated harm reduction strategies to account for these differences

**Supporting Vibrant Communities**
Non-profit sectors are able to generate revenue from legitimate charitable lottery programs, while funds from other regulated lottery products support public programs and services for the people of PEI.
A Strategy for Socially Responsible Gambling

Priorities

1: Safe, Healthy and Positive Play
All forms of gambling, including ticket lottery, casino games and charitable gaming, are forms of regulated entertainment on PEI. Through its government partners in charitable gaming and through ALC, high-quality regulated and socially responsible products will be available for those who choose to gamble. Organizations seeking a charitable lottery license will be offered training around harm minimization. At each opportunity, ALC players will be incentivized to make lower-risk choices and utilize harm minimization tools such as breaks in play and loss-limit setting.

2: Increased Literacy Around Safer Gambling
The Commission recognizes that in order to provide gambling products to the people of PEI safely, individuals need to understand how games work and be aware of low-risk limits and behaviours. The Lower Risk Gambling Guidelines offer players recommendations to help reduce the risk of experiencing harms from gambling. The Commission will work with its partners in health and its agent, ALC, on efforts to increase literacy related to gambling and the prevention of gambling-related harms among all people in the province.

3: Balance Access with Player Protection
The Commission recognizes the digital world is making numerous gambling options accessible to Islanders and influences player expectations about the products offered by the Province's authorized agent. It also recognizes that transformation of destination gambling venues will be needed to respond to changing player expectations. Balancing access to digital and destination sites with due consideration for the safety and protection of island players will guide future developments by authorized agents on PEI.

4: Inclusive Programs and Services
The government is constantly investing in programs and services to assist the people of PEI in all aspects of their life. The Commission's focus is on ensuring programs exist to wrap around those who are experiencing gambling harms. Programs and services must be available for individuals who gamble, as well as those in the gambler’s inner circle. In addition, programs and services must recognize each individuals’ journey and be accessible to people from all different backgrounds.

5: Minimize Harms from Gambling
Gambling has been referred to - like alcohol and tobacco - as “no ordinary commodity,” as it comes with inherent health and social risks. Specific forms of gambling, such as continuous and rapid-paced games, are associated with higher risks of harm. By understanding factors that contribute to greater risks of harm, the government and its agent, ALC, can reduce harm by minimizing access to higher-risk games and adopting evidence-based strategies to promote lower-risk behaviours. These strategies and harm reduction services should be culturally informed and include culture-specific or targeted considerations, including gambling support for racialized groups.
## Priority 1: SAFE, HEALTHY AND POSITIVE PLAY

A. Incentivize “Healthy Play”
   i. Develop a program to tie player card incentives to breaks in play, setting limits and participating in educational activities and provide non-gambling rewards
   ii. Increase safeguards and the frequency of dynamic pop-ups on ALC.ca that will promote lower risk gambling and player engagement with educational tools

B. Utilize insights from aggregate player card data to inform policy decisions and educational programs

C. Continue to strengthen ALC’s relationship with Addiction Services and the Department of Health and Wellness Gambling Support Unit

D. Position Charitable Gaming for Increased Consumer Protection
   i. Continue and strengthen working relationships with policing and federal regulatory agencies to detect and delete illegal activity, including money laundering and fraud
   ii. Review the charitable gaming legislation and regulatory framework for gaps in inspection, compliance, enforcement authority, and clarity on minimum age of play to align with best practices
   iii. Dedicate resources for charitable gaming regulation, including inspection and compliance audits of charitable lottery licensees
   iv. Based on gambling harm minimization research and best practices, develop quick and accessible training for charitable lottery licensees
Priority 2: INCREASED LITERACY AROUND SAFER GAMBLING

A. Increase Education
   i. Through the Department of Health and Wellness (DHW), develop public awareness campaigns around:
      a. The progression of gambling addictions, behavioural addictions or signs of gambling harms
      b. Advice or direction for seeking help
   ii. Through ALC, develop gambling literacy campaigns and targeted messaging around:
      a. The Lower-Risk Gambling Guidelines
      b. Games of chance, odds, risks, and gambling harms
   iii. Evaluate education and prevention efforts at the DHW and ALC to ensure effectiveness
   iv. Translate harm reduction documents and products – leveraging the expertise of ethnocultural organizations that already provide translation services

B. Inform Players on Behaviour
   i. Provide personalized normative feedback (PNF) to players-at-risk in conjunction with advice and support from trained ALC staff
   ii. Over the long term, create systems (through personal player cards) to “push” notifications to players who exceed Lower Risk Gambling behaviour

C. Educate and Protect Youth
   i. Offer evidence-based gambling education for youth (16+) that applies the appropriate cognitive development approach, educates youth about odds and shifts the focus to participation in other activities
   ii. Develop on-campus policies and messaging for university and college students around gambling and harm reduction that addresses high risk groups including young males participating in sports betting, and players using VLTs and casino table games
Priority 3: BALANCE ACCESS WITH PLAYER PROTECTION

A. Modify Advertising and Promotion
   i. Ensure advertising campaigns consider appropriate player/citizen protections by reviewing advertising standards of other Atlantic Provinces with a view of adopting a similar code/policy/statement for PEI
   ii. When advertising games, betting and lotteries, consider a model similar to cannabis where advertising is curtailed for types of games shown be higher-risk and rely on experts such as GamRes/Gamgard to identify higher-risk games

B. Follow Best Practices for Digital Games
   i. Increase player protections for those who wish to play digital games by developing a plan, based on best practices, to decrease the utilization of illicit offshore sites
   ii. Adopt technical standards that restrict higher-risk digital games and limit the number of different high-risk games available
   iii. Ensure processes are in place that engage experts to identify higher risk digital games
   iv. Measure the long-term impacts of digital games on gambling prevalence on PEI, that is supported by an allocation of funding for an evaluation and prevalence study

C. Through ALC, apply a low-risk design lens in any expansions or developments at destination sites, favoring designs that follow best practices, understanding that all VTL licensed premises are considered destination sites

D. Continue funding the Island harness racing industry partnerships to support the sustainability and vitality of PEI harness racing through initiatives that maintain and enhance the industry's economic, cultural and environmental contributions
Priority 4: INCLUSIVE PROGRAMS AND SERVICES

A. Reduce stigma around gambling and help-seeking through public messaging and use of trauma-informed language. For example, use language like “safer gambling” or “healthy play”, shift focus from personal behaviours to systemic factors contributing to gambling harms, and educate the general public about addictions.

B. Continue, at a minimum, to direct 1.5% of net gaming revenue to the Department of Health and Wellness's Gambling Support Unit. Conduct a review of funding targets with a view to being comparable to other provincial lottery regulators.

C. Better integrate and coordinate departmental supports for crisis intervention and counselling including the 24/7 gambling support line as well as 211.

D. Through government and community partners, develop robust online resources for individuals experiencing gambling harm and collaborate with other jurisdictions and health authorities to ensure best-in-class resources are available.

E. Through various health partners in PEI, increase the capacity of service providers to support gambling and other associated addictions.

F. Through government and community partners, provide dedicated resources for families and youth experiencing gambling harms.

G. Consider Vulnerable Populations
   i. Use an equity lens to review existing gambling prevention and support programs to better identify the specific needs and risks of vulnerable populations most impacted by gambling.
   ii. Include supports targeted to address the specific needs of vulnerable populations when adopting new programs and services for gambling harm reduction.

H. Collaborate with organizations such as BIPOC USHR (Black, Indigenous, and People of Colour United for Strength, Home, Relationship) and Nuwelcom to ensure gambling-specific public awareness and education campaigns are communicated effectively and appropriately across various cultures and languages.

I. Through the Department of Health and Wellness Gambling Support Unit and ALC continue to offer professional development for clinicians, including training to strengthen culturally competent skills and knowledge as well as increase awareness of cultural beliefs and values and how culture may impact the relationship between the counsellor and client.
Priority 5: MINIMIZE HARMS FROM GAMBLING

A. Limit Access to Video Lottery Terminals (VLTs)
   i. Implement measures to remove VLTs from Licensed Gaming Premises (Category B Gaming Centers) that do not provide adequate harm minimization (also known as responsible gambling, or RG) support or that promote alcohol consumption while gambling and/or promote continued and prolonged VLT play
   ii. Maintain VLT Licensed Premises and numbers at, or below, current levels
   iii. Study VLT placement in PEI to understand how and where there is disproportionate access to these games by high risk and low socio-economic groups

B. Develop Player Cards
   i. Support ALC’s plans for player cards and ‘known player’ data to enable personalized feedback (PF) for all players
   ii. Consult with ALC and RG experts on the development of player cards that can be used for all casino-style gaming (including destination VLTs) to allow personal deposit limits, loss limits and personalized normative feedback (PNF)

C. Work with ethnocultural organizations to provide education about gambling and its impacts

D. Collaborate with financial institutions and health providers to identify and promote existing tools for self-regulation and harm reduction

E. Limit the ability to gamble using credit cards on-land and online as well as limit access to ATMs in Gaming Centres operated by ALC and licensed operators

F. Improve transparency around types of supports available for gambling and other behavioral addiction
This 2023-2028 Responsible Gambling Strategy was developed thanks to valuable feedback from a variety of informed sources.

The authors wish to thank:

Experts in the Field of Gambling Harm Minimization, including Janine Robinson, M.Ed. (Centre for the Advancement of Best Practices and Managing Director, RG+), Dr. Richard Wood (Gamres, Gamgard, Gamtalk), and Dr. Matthew Young (Greo; formerly, the Canadian Centre for Substance Use and Addiction) for the informative and thoughtful feedback

Specialists with the Department of Health and Wellness for providing valuable advice, insight and direction related to mental health and addiction programs, public health and gambling policy and research

Officials with the Department of Justice and Public Safety for sharing their regulatory perspective and offering information related to the administration of lottery licenses to charities and not-for-profits

The Atlantic Lottery Corporation for providing sound advice and helpful information about the current state and future of lottery and gaming operations in PEI and Atlantic Canada

PEI Lotteries Commission’s Atlantic counterparts for their collaboration and willingness to share advice and lessons learned in the field of harm minimization gambling.

The People of Prince Edward Island for their personal stories, opinions, and ideas related to the government’s role in gambling, reducing gambling harms and providing programs and services

A special thank you also goes to individuals with Gamblers Anonymous, the Poverty Reduction Council, the Canadian Federation for Independent Business and the Harness Racing Industry for taking the time to be consulted during the development of this strategy
References

Legal authorities:

Atlantic Lottery Regulations, PEI Reg EC863/76  
Criminal Code of Canada, RSC 1985, c C-46  
Executive Council, Prince Edward Island, Orders EC2016-616, EC884-44 and EC2021-667  
Gaming Centers Control Regulations, PEI Reg EC409/05  
PEI Lotteries Commission Act, RSPEI 1988, c L-17

Literature:

Strategy, Methodology and Engagement List

Strategy Development Process Undertaken by MRSB

- Review of the 2008 Prince Edward Island Responsible Gaming Strategy, Leadership, Integrity and Responsibility
- Review of trends, issues and external factors impacting the gaming environment on Prince Edward Island
- Research and literature review related to harm minimization in gambling, gambling harms and gambling prevalence
- Review of gambling frameworks and harm minimization efforts in gambling or healthy play initiatives in other jurisdictions
- Collection of public, stakeholder and key informant feedback through one-on-one interviews, public consultations and an online feedback forum, and a survey with charitable and community sector organizations

Consultation and Engagement

Key Informant Interviews

- Department of Health and Wellness – Provincial Gambling Support Unit
- Experts in the Field of Harm Minimization
  - Janine Robinson, M.Ed. (Centre for the Advancement of Best Practices and Managing Director, RG+)
  - Dr. Richard Wood (Gamres, Gamgard, Gamtalk)
  - Dr. Matthew Young (Gambling Research Exchange Ontario; formerly, the Canadian Centre for Substance Use)
- PEI Department of Justice and Public Safety
- Gamblers Anonymous
- Members of the PEI Harness Racing Industry
- Canadian Federation of Independent Business
- Atlantic Lottery Corporation representatives, including:
  - PlayWise Lead for PEI/Corporate Social Responsibility Advisor
  - Director of Social Responsibility and Learning
  - General Manager for Red Shores
  - Gaming product experts
- Atlantic Lottery Corporation Shareholders
Public Consultation

Public consultation was announced via government news release on November 29, 2021 with the launch of a bilingual survey that remained open until December 20, 2021.

The survey and details on how to participate in one of three virtual public meetings, was promoted frequently on the Government of PEI’s social media channels and in Island newspapers. One of the virtual meetings included simultaneous translation in French.

**Five questions were asked in the survey and in the virtual meeting:**

1. The principles of social responsibility, public trust, player protection, strengthened communities and responsible fiscal management have guided the actions and decisions of the Government, as represented by the PEI Lotteries Commission and its agent, Atlantic Lottery Corporation. What do you consider to be core principles that should guide gaming and lottery activities in PEI?

2. How can the Government and ALC be more socially responsible and increase public trust when it comes to offering gambling products to Islanders?

3. What role should Government have in offering an alternative to unregulated (offshore) online casino-style games?

4. Do you have any suggestions to ensure gaming products are delivered to Islanders in a way that does not enable problem gambling?

5. What types of programs and services are needed to support individuals who are experiencing problems with their gambling?

There was low attendance in the virtual public meetings and 25 responses to the survey for the general public. One written submission was received.

**Online Request for Feedback with the Charitable and Community Sector** – More than 60 not-for-profit and charitable organizations known to participate in charitable gaming were invited to provide feedback through an online survey.

**Seven questions were asked in this survey:**

1. What type of charitable gaming does your organization participate in?
   a. Bingo
   b. 50/50
   c. Raffles
   d. Monte Carlo Events
   e. Chace the Ace
   f. Other (please specify)
2. What percentage of your revenues come from charitable gaming on an annual basis?
   a. Less than 1%
   b. Between 2 - 5%
   c. Between 5 – 10%
   d. Between 10 – 20%
   e. Over 20%

3. What expense/activities etc. are supported with the gaming revenues you receive?

4. How do you advertise or promote your charitable gaming product?

5. Do you have parameters in place to ensure gaming products do not enable problem gambling?

6. What is working well and should continue?

7. What is not working so well and needs to be changed or improved?

There were 14 responses received to the charitable and community survey.
Appendix A: Implementation Guide

The following table outlines who is responsible for leading each strategic action, timeframes for expected results, and key performance indicators or metrics to evaluate the impact of these initiatives.

Priority 1: SAFE, HEALTHY AND POSITIVE PLAY

<table>
<thead>
<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
<th>TIMEFRAME</th>
<th>POTENTIAL KEY PERFORMANCE INDICATORS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Incentivize “Healthy Play”</td>
<td>ALC, RGE</td>
<td>Discovery/design within the first year; outcomes expected within 2-3 years</td>
<td>% of players using player cards # of non-gambling rewards given for “healthy play” behaviors</td>
</tr>
<tr>
<td>A. i</td>
<td>ALC, RGE</td>
<td>Discovery/design within the first year; outcomes expected within 2-3 years</td>
<td>% of players using player cards # of non-gambling rewards given for “healthy play” behaviors</td>
</tr>
<tr>
<td>A. Incentivize “Healthy Play”</td>
<td>ALC</td>
<td>Within the first year</td>
<td># of RG messages Increased visibility of RG messages Increased uptake of RG tools</td>
</tr>
<tr>
<td>A. ii</td>
<td>ALC</td>
<td>Within the first year</td>
<td># of RG messages Increased visibility of RG messages Increased uptake of RG tools</td>
</tr>
<tr>
<td>B. Utilize insights from aggregate player card data to inform policy decisions and educational programs</td>
<td>ALC</td>
<td>Within 5 years</td>
<td>Player card data aggregated</td>
</tr>
<tr>
<td>C. Continue to strengthen ALC’s relationship with Addiction Services and the Department of Health and Wellness Gambling Support Unit</td>
<td>ALC, DHW, Addiction Services</td>
<td>Ongoing</td>
<td># of interactions between ALC (Playwise) and DHW/Addiction Services # of joint initiatives # of players directed to help within the health system from ALC</td>
</tr>
<tr>
<td>D. Position Charitable Gaming for Increased Consumer Protection</td>
<td>ALC, DHW, Addiction Services</td>
<td>Ongoing</td>
<td># of interactions between ALC (Playwise) and DHW/Addiction Services # of joint initiatives # of players directed to help within the health system from ALC</td>
</tr>
</tbody>
</table>

D. Position Charitable Gaming for Increased Consumer Protection
i. Continue and strengthen working relationships with policing and federal regulatory agencies to detect and delete illegal activity, including money laundering and fraud
ii. Review the charitable gaming legislation and regulatory framework for gaps in inspection, compliance, enforcement authority, and clarity on minimum age of play to align with best practices
iii. Dedicate resources for charitable gaming regulation, including inspection and compliance audits of charitable lottery licensees
iv. Based on gambling harm minimization research and best practices, develop quick and accessible training for charitable lottery licensees
### Priority 2: INCREASED LITERACY AROUND SAFER GAMBLING

<table>
<thead>
<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
<th>TIMEFRAME</th>
<th>POTENTIAL KEY PERFORMANCE INDICATORS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. i.</td>
<td>DHW</td>
<td>Begin within the first year</td>
<td># of campaigns developed and tested # of campaigns executed</td>
</tr>
<tr>
<td>A. ii.</td>
<td>ALC</td>
<td>Begin within the first year</td>
<td># of campaigns developed and tested # of campaigns executed</td>
</tr>
<tr>
<td>A. iii</td>
<td>DHW, ALC</td>
<td>Begin within the first year</td>
<td>research and data produced</td>
</tr>
<tr>
<td>A. iv.</td>
<td>DHW</td>
<td>Begin within the first year</td>
<td>number of materials translated</td>
</tr>
<tr>
<td>B. i.</td>
<td>ALC</td>
<td>Within 3 years</td>
<td>% of players receiving PNF and support from ALC staff</td>
</tr>
</tbody>
</table>

**A. Increase Education**

i. Through the Department of Health and Wellness (DHW), develop public awareness campaigns around:

a. The progression of gambling addictions, behavioural addictions or signs of gambling harms

b. Advice or direction for seeking help

ii. Through ALC, develop gambling literacy campaigns and targeted messaging around:

a. The Lower-Risk Gambling Guidelines

b. Games of chance, odds, risks, and gambling harms

iii. Evaluate education and prevention efforts at the DHW and ALC to ensure effectiveness

iv. Translate harm reduction documents and products – leveraging the expertise of ethnocultural organizations that already provide translation services

**B. Inform Players on Behaviour**

i. Provide personalized normative feedback (PNF) to players-at-risk in conjunction with advice and support from trained ALC staff

ii. Over the long term, create systems (through personal player cards) to “push” notifications to players who exceed Lower Risk Gambling behaviour
<table>
<thead>
<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
<th>TIMEFRAME</th>
<th>POTENTIAL KEY PERFORMANCE INDICATORS</th>
</tr>
</thead>
<tbody>
<tr>
<td>B. ii.</td>
<td>ALC</td>
<td>Within 3 years</td>
<td>% of players receiving PNF</td>
</tr>
<tr>
<td>C. Educate and Protect Youth</td>
<td>i. Offer evidence-based gambling education for youth (16+) that applies the appropriate cognitive development approach, educates youth about odds and shifts the focus to participation in other activities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C. i.</td>
<td>ALC and community, education and health partners</td>
<td>Within 4 years</td>
<td>Programs developed or adopted for PEI youth, Programs delivered to youth</td>
</tr>
<tr>
<td>C. Educate and Protect Youth</td>
<td>ii. Develop on-campus policies and messaging for university and college students around gambling and harm reduction that addresses high risk groups including young males participating in sports betting, and players using VLTs and casino table games</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C. ii.</td>
<td>ALC and community, education and health partners</td>
<td>Within 2 years</td>
<td># of messages developed, # of messages delivered</td>
</tr>
</tbody>
</table>

**Priority 3: BALANCE ACCESS WITH PLAYER PROTECTION**

<table>
<thead>
<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
<th>TIMEFRAME</th>
<th>POTENTIAL KEY PERFORMANCE INDICATORS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Modify Advertising and Promotion</td>
<td>i. Ensure advertising campaigns consider appropriate player/citizen protections by reviewing advertising standards of other Atlantic Provinces with a view of adopting a similar code/policy/statement for PEI</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. ii.</td>
<td>PEILC</td>
<td>Begin within 1.5 years</td>
<td>Review of all advertising and promotion by PEILC, ALC, Adoption of Code for PEI advertising</td>
</tr>
</tbody>
</table>

**B. Follow Best Practices for Digital Games**

i. Increase player protections for those who wish to play digital games by developing a plan, based on best practices, to decrease the utilization of illicit offshore sites

ii. Adopt technical standards that restrict higher-risk digital games and limit the number of high-risk games available

iii. Ensure processes are in place that engage experts to identify higher risk digital games

<p>| B. i. – iii. | ALC, PEILC | Begin within the first year | Technical standards that restrict higher-risk digital games and limit the different high-risk games available, Processes established to engage experts to identify higher-risk digital games |</p>
<table>
<thead>
<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
<th>TIMEFRAME</th>
<th>POTENTIAL KEY PERFORMANCE INDICATORS</th>
</tr>
</thead>
</table>
| B. Follow Best Practices for Digital Games  
i. Measure long-term impacts of digital games on gambling prevalence on PEI, that is supported by an allocation of funding for an evaluation and prevalence study | DHW | Begin within the first year | Annual evaluation and prevalence study on the impacts of digital games on gambling prevalence in PEI |
| C. Through ALC, apply a low-risk design lens in any expansions or developments at destination sites, favoring designs that follow best practices, understanding that all VLT licensed premises are considered destination sites | ALC | Within the first year | # of lower-risk designs adopted |
| D. Continue funding the Island harness racing industry partnerships to support the sustainability and vitality of PEI harness racing through initiatives that maintain and enhance the industry's economic, cultural and environmental contributions | PEILC | Ongoing | Industry remains vibrant and strong |

Priority 4: INCLUSIVE PROGRAMS AND SERVICES

<table>
<thead>
<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
<th>TIMEFRAME</th>
<th>POTENTIAL KEY PERFORMANCE INDICATORS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Reduce stigma around gambling and help-seeking through public messaging and use of trauma-informed language. For example, use language like “safer gambling” or “healthy play”, shift focus from personal behaviours to systemic factors contributing to gambling harms, and educate the general public about addictions</td>
<td>ALC, DHW</td>
<td>Begin within the first year</td>
<td>Language reviewed and updated as necessary</td>
</tr>
<tr>
<td>B. Continue, at a minimum, to direct 1.5% of net gaming revenue to the Department of Health and Wellness's Gambling Support Unit. Conduct a review of funding targets with a view to being comparable to other provincial lottery regulators</td>
<td>PEILC</td>
<td>Begin within the first year</td>
<td>Review of funding targets compared to other provincial lottery regulators</td>
</tr>
</tbody>
</table>
| C. Better integrate and coordinate departmental supports for crisis intervention and counselling including the 24/7 gambling support line as well as 211 | DHW | Begin within the first year | Collaboration and cross-departmental initiatives  
# of individuals accessing services |
<p>| D. Through government and community partners, develop robust online resources for individuals experiencing gambling harm and collaborate with other jurisdictions and health authorities to ensure best-in-class resources are available | | | |</p>
<table>
<thead>
<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
<th>TIMEFRAME</th>
<th>POTENTIAL KEY PERFORMANCE INDICATORS</th>
</tr>
</thead>
<tbody>
<tr>
<td>D.</td>
<td>DHW and community partners</td>
<td>Begin within the first year</td>
<td># of online supports developed or launched</td>
</tr>
<tr>
<td>E.</td>
<td>Through various health partners in PEI, increase the capacity of service providers to support gambling and other associated addictions</td>
<td>DHW</td>
<td>Within 2 years</td>
</tr>
<tr>
<td>F.</td>
<td>Through government and community partners, provide dedicated resources for families and youth experiencing gambling harms</td>
<td>DHW</td>
<td>Begin within the first year</td>
</tr>
<tr>
<td>G.</td>
<td>Consider Vulnerable Populations</td>
<td>DHW, ALC</td>
<td>Begin within 2 years</td>
</tr>
<tr>
<td>G.</td>
<td>Consider Vulnerable Populations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>H.</td>
<td>Collaborate with organizations such as BIPOC USHR (Black, Indigenous, and People of Colour United for Strength, Home, Relationship) and Nuwelcom to ensure gambling- specific public awareness and education campaigns are communicated effectively and appropriately across various cultures and languages</td>
<td>DHW/ALC</td>
<td>Within the first year</td>
</tr>
<tr>
<td>I.</td>
<td>Through the Department of Health and Wellness Gambling Support Unit and ALC continue to offer professional development for clinicians including training to strengthen culturally competent skills and knowledge as well as increase awareness of cultural beliefs and values and how culture may impact the relationship between the counsellor and client</td>
<td>DHW</td>
<td>Ongoing</td>
</tr>
</tbody>
</table>

**Priority 5: MINIMIZE HARMS FROM GAMBLING**

<table>
<thead>
<tr>
<th>ACTION</th>
<th>RESPONSIBILITY</th>
<th>TIMEFRAME</th>
<th>POTENTIAL KEY PERFORMANCE INDICATORS</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.</td>
<td>Limit Access to Video Lottery Terminals (VLTs)</td>
<td>DHW</td>
<td>Ongoing</td>
</tr>
<tr>
<td>A.</td>
<td>Implement measures to remove VLTs from Licensed Gaming Premises (Category B Gaming Centers) that do not provide adequate harm minimization (also known as responsible gambling, or RG) support or that promote alcohol consumption while gambling and/or promote continued and prolonged VLT play</td>
<td>Ongoing</td>
<td># of VLTs removed</td>
</tr>
<tr>
<td>ACTION</td>
<td>RESPONSIBILITY</td>
<td>TIMEFRAME</td>
<td>POTENTIAL KEY PERFORMANCE INDICATORS</td>
</tr>
<tr>
<td>--------</td>
<td>----------------</td>
<td>-----------</td>
<td>---------------------------------------</td>
</tr>
<tr>
<td>A. i.</td>
<td>ALC</td>
<td>Within the first year</td>
<td># of inspections # of site holder agreements revoked # of increased RG initiatives</td>
</tr>
<tr>
<td>A. ii.</td>
<td>PEILC</td>
<td>Ongoing</td>
<td># VLT sites and numbers</td>
</tr>
<tr>
<td>A. iii.</td>
<td>ALC, Department of Health and Wellness (DHW)</td>
<td>Within 3 years</td>
<td>research and data produced</td>
</tr>
<tr>
<td>B. i.</td>
<td>Atlantic Lottery Corporation (ALC)</td>
<td>Within 3 years</td>
<td>% of players using player cards Ability to provide PNF to players</td>
</tr>
<tr>
<td>B. ii.</td>
<td>ALC, Experts in the Field of Gambling Harm Minimization</td>
<td>Discovery/design immediately; outcomes expected within 2-3 years</td>
<td>% of players using player cards Ability to set deposit limits, loss limits and uptake of these features</td>
</tr>
<tr>
<td>C.</td>
<td>DHW - KPI</td>
<td>Ongoing</td>
<td>feedback from partnership with ethnocultural organizations</td>
</tr>
<tr>
<td>D.</td>
<td>ALC and community, health and business partners</td>
<td>Within the first year</td>
<td># of tools identified Promotion and uptake of tools</td>
</tr>
<tr>
<td>E.</td>
<td>ALC, and VLT site holders</td>
<td>Within the first year</td>
<td># of sites with barriers to credit card use (for gambling) and automated teller machines</td>
</tr>
<tr>
<td>F.</td>
<td>ALC, DHW</td>
<td>Within the first year</td>
<td>Promotion and uptake of supports available</td>
</tr>
</tbody>
</table>
Appendix B: Relationship Structure of Province of PEI and the Atlantic Lottery Corporation

- **Government of Prince Edward Island**
  Department of Finance

- **PEI Lotteries Commission (PEILC)**
  A Shareholder in Atlantic Lottery Corporation

- **Atlantic Lottery Corporation**
  The Agent of PEILC to conduct and manage:
  - Lottery products, including lottery retailers and on-line offerings on alc.ca
  - Destination Lottery (Gaming Centres)
  - Harness Racing at Red Shores Properties
Appendix C: History of PEI Harness Racing

With its long history and close ties to agriculture and tourism, the harness racing industry has long been considered part of the Island’s social fabric. The Charlottetown Driving Park first opened its doors for standardbred harness racing in 1888. It expanded as a “racino” in 2005 – known as the Charlottetown Driving Park Entertainment Centre – until it was rebranded as the Red Shores Racetrack and Casino at Charlottetown Driving Park in 2009. Summerside Raceway is believed to be one of the oldest, continuously racing tracks in Canada, opening in 1886. It expanded with the grand opening of the Red Shores Racetrack and Casino at the Summerside Raceway in 2009.

Wagering on harness racing (known as pari-mutuel wagering) is regulated in Canada under the Canadian Pari-Mutuel Agency, with the conduct of racing regulated provincially under the Atlantic Provinces Harness Racing Commission Act. In Prince Edward Island, the Minister of Finance is Minister Responsible for Harness Racing, which within the Department falls under the purview of the Prince Edward Lotteries Commission (PEILC). The Atlantic Lottery Corporation (ALC) has an agency agreement with the PEILC for the harness racing operation at the two Red Shores properties.

From the funds ALC generates, the PEI Lotteries Commission assists the PEI Harness Racing Industry Association in creating and maintaining growth in the harness racing sector. The PEI Harness Racing Industry Association has a goal of preserving agriculture, rural, and heritage traditions across the Island.

Apart from the two large tracks, there is a vibrant grassroots network of matinee track facilities and participants across the Island – in Alberton, O’Leary, Tyne Valley, Kensington, and Pinette.

PEI’s harness racing industry is a growing one, with approximately 750 participants licensed as owners, breeders, trainers, drivers, and grooms - representing the second largest producer of standardbreds in Canada, trailing only Ontario, and leading the country in percentage of new owners.

Prince Edward Island has staged several World and National level events such as O’Brien Awards, along with the World and National Driving Championships & World Trotting Congress.

The industry indicates that it generates approximately $36.5 million in direct operating expenditures per year, with 750 jobs. It is a central attraction within the PEI Tourism sector, including the Gold Cup and Saucer Race – which is considered one of the most celebrated harness racing events in Eastern Canada.
For more information please visit:

Province of PEI Gambling Support Information
peigamblingsupport.princeedwardisland.ca
Lower-Risk Gambling Guidelines
ALC.ca Helpful Resources