



Centre for Addiction and Mental Health  
Centre de toxicomanie et de santé mentale

**Centre for Addiction and  
Mental Health**

1001 Queen St. West  
Toronto, Ontario  
Canada M6J 1H4  
Tel: 416.535.8501

**Centre de toxicomanie et  
de santé mentale**

1001, rue Queen Ouest  
Toronto, Ontario  
Canada M6J 1H4

[www.camh.net](http://www.camh.net)

# **CAMH Response to AGCO Regulatory Review of Responsible Gambling**

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*A PAHO/WHO Collaborating  
Centre*

*Un Centre collaborateur  
OPS/OMS*

*Affiliated with the  
University of Toronto*

*Affilié à  
l'Université de Toronto*

On September 28, 2011, representatives of the Centre for Addiction and Mental Health (CAMH)/ Problem Gambling Institute of Ontario (PGIO) participated in a roundtable discussion on the regulation of gambling with staff from the Alcohol and Gaming Commission of Ontario. This submission is being sent to AGCO staff to follow up on the comments made at that meeting. The comments below are not meant to replace the contribution at that meeting, but rather to place some additional thoughts on the record. CAMH/PGIO is grateful for the opportunity to engage in a discussion about the regulation of gambling in Ontario and ways to reduce gambling-related harm.

CAMH commends the AGCO for broadening its conception of risk to include additional factors that relate to gambling-related harm. The targeting of physical and virtual gaming environments and game features is particularly commendable. Certain gambling modalities carry a higher risk that their users will develop gambling problems or that existing gambling problems will be exacerbated (electronic gaming machines are known to be particularly problematic), so the establishment of specific standards around gaming environments and features is a positive development.

CAMH believes that there are two additional areas of risk that could be addressed within the AGCO's current social responsibility mandate: access to money and hours of operation.

*Access to money.* The AGCO review notes that patrons may not cash cheques on gaming premises and that extension of credit is limited to commercial casinos. This is positive, but beyond that, anecdotal and survey evidence and the experience of our clinicians suggest that on-site access to money in general carries great risk in terms of impact on those with gambling problems. House credit, cheque cashing, bill acceptors on electronic gaming machines (EGMs), and on-site ATMs – particularly those with very high withdrawal limits – are believed to be particularly problematic. CAMH recommends that the AGCO consider examining the public health effects of its credit and ATM regulations.

*Extended hours of operation.* Hours of operation are relevant to concerns around problem gambling, and thus to the AGCO's social responsibility mandate. Many Ontario problem gambling treatment providers report that a disproportionate number of people with gambling problems play EGMs between midnight and 6:00am and that extended hours have negative impacts on clients, especially for those who have sleeping issues and for shift workers. Driving while extremely tired is another public health concern related to extended hours of operation.

The AGCO's regulatory review focuses on individual-level and site-specific risks. But there are risks at the system level as well, in the sense that the levels of availability and accessibility of gambling have social and economic impacts. Increases in gambling availability are associated with increases in problem gambling. There is international evidence that the number of people presenting for problem gambling treatment and the number of bankruptcies both rise following the opening of casinos. The continued expansion of government-operated gambling in Ontario – for example through the provision of internet gambling – is likely to have a negative impact on some individuals and populations. Therefore, CAMH recommends that the AGCO ensure that any planned expansion of gambling in Ontario, whether in terms of new venues or

expansion of existing ones, is preceded and informed by community consultation and public health-based risk assessment.

With the shift to a risk-based regulatory system, research and evaluation become paramount. CAMH commends the AGCO's inclusion as one of its four regulatory outcomes that "Harm from gambling to individuals and the broader community is minimized." CAMH recommends that the AGCO monitor and evaluate outcomes with respect to operators' responsible gaming initiatives and social responsibility obligations, either by conducting evaluation itself or commissioning it to a third party such as the Ontario Problem Gambling Research Centre. The onus should be on operators to demonstrate the effectiveness of their responsible gaming activities. CAMH also recommends that the AGCO conduct or commission an investigation of the social and economic impacts of gambling in Ontario, and that the AGCO monitor gambling-related risks, both to individuals and communities, on an ongoing basis. Ultimately, the overall prevalence of problem gambling in the province will be the best indicator by which to assess the AGCO's objective of minimizing gambling-related harm.

Gambling is not an economic activity like others. As the AGCO moves to ensure a more streamlined regulatory environment for business, it is good that the regulator is also re-evaluating its social responsibility mandate and broadening its conception of the risks associated with gambling to incorporate public health concerns. Thank you once again for inviting comments and engaging in discussions about your approach to the regulation of gambling in Ontario.

For further information, please contact:

Barney Savage  
Director of Public Policy  
Centre for Addiction and Mental Health  
416 535-8501, ext. 2129  
[barney\\_savage@camh.net](mailto:barney_savage@camh.net)

Robert Murray  
Manager, Community and Education Resources  
Problem Gambling Institute of Ontario, Centre for Addiction and Mental Health  
519 743-1939  
[robert\\_murray@camh.net](mailto:robert_murray@camh.net)