

Written submissions from organisations

*(Excluding thirteen
organisations which
indicated that their views
should not be disclosed)*

團體意見書

*(不包括十三份表示不願意
公開的意見書)*

4 August 2023

Secretariat to the Betting and Lotteries Commission
c/o Home and Youth Affairs Bureau
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

By email: hab2@hab.gov.hk

Dear Secretary,

I write on behalf of the Melbourne Racing Club (MRC), one of the major administrators of thoroughbred horseracing in Australia.

We wish to express our support of the Hong Kong Jockey Club's (HKJC) submission to the Betting and Lotteries Commission (BLC) to increase its number of simulcast races permitted in a season, and to increase the maximum number of races on a simulcast day.

The MRC enjoys an extremely strong relationship with the HKJC, an organisation for which we hold the utmost respect as a global leader in racing, wagering and philanthropy.

A major part of the foundation of this relationship has been through our shared work in international simulcasting, which we consider to be particularly important as racing's fan base continues to grow globally.

Our industries are further intertwined by the prolific global exchange of horses that sees considerable expatriate participation and a strong following among racing fans.

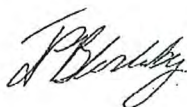
We believe that allowing the addition of simulcast races will enable the HKJC to maintain and increase engagement in horseracing among its existing customers and attract new customers to this great sport.

We also strongly believe in systems that provide such opportunities to racing fans to enjoy and wager on races from different locations via legal wagering channels. Without such systems, such as the channels provided by the HKJC, we believe there is a risk of leakage of custom to illegal/offshore operators, who not only avoid paying appropriate taxes and levies, but make no charitable contributions for which the HKJC is renowned, and for which the proceeds of simulcasts will contribute.

We do appreciate the concern of the BLC on the impact of betting on young people. However, given the current demographic of bettors in Hong Kong, and the study required in betting on international horseracing, we believe the likely impact to be low.

Thank you for your consideration of our submission to support the HKJC, which we hope you decide favourably for the reasons outlined.

Yours faithfully



Josh Blanksby
Chief Executive Officer
Melbourne Racing Club

From: President's Office
To: [HA2/HYAB](#)
Subject: Submission by HKMU
Date: 2023年8月4日 14:16:22
Attachments: [image003.png](#)
[Submission on additional horse race betting activities by HKMU.pdf](#)

To: Secretariat to the Betting and Lotteries Commission

Please find enclosed please the submission regarding HKJC's proposals.

If you have any questions, please do not hesitate to contact us.

Thanks & regards,

President's Office
Hong Kong Metropolitan University



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香港都會大學
HONG KONG
METROPOLITAN
UNIVERSITY

4 August 2023

13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(Attention: Secretariat to the Betting and Lotteries Commission)

林群聲教授
級紫前星章 太平紳士
校長
環境化學講座教授
Professor
Paul Kwan-sing LAM
PhD, SBS, JP
President
Chair Professor of
Environmental Chemistry

Dear Mr Chairman,

I am writing to you on behalf of Hong Kong Metropolitan University, a proud beneficiary of generous donations from Hong Kong Jockey Club (Charities) Ltd (HKJC). We would like to express our support for the proposed increase in the maximum number of simulcast races from 10 to 25 per year and the maximum number of non-local races per simulcast from nine to 12.

We believe that this change will provide HKJC with the flexibility to select the most popular races and offer racing fans more opportunities to participate. This, in turn, could potentially increase the funds raised for charitable causes, thus benefiting many more people.

Please do not hesitate to let us know if there is anything else we can do to support this change. We wish HKJC all the best in the years to come.

Yours sincerely,

Professor Paul LAM Kwan-sing
President

To: [HA2/HYAB](#)
Subject: Comments on the HKJC's Proposals of Additional Horse Race Betting Activities
Date: 2023年8月4日 17:03:07
Attachments: [2023.08.03 Eastern Athletic Association Basketball Team.pdf](#)

4 August 2023

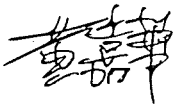
**The Hong Kong Jockey Club's Proposals of
Additional House Race Betting Activities**

On behalf of the Eastern Athletic Association Basketball Team, we write to support the Hong Kong Jockey Club's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12.

The Hong Kong Jockey Club has long been supportive of sports development in Hong Kong. The Club has transformed the Concourse of the 2/F Grandstand II at the Sha Tin Racecourse into a sports ground with two basketball courts, which have become one of the training venues for our youth basketball teams and competitions.

We trust that by increasing the maximum number of simulcast races, the Hong Kong Jockey Club would stabilize its betting income, fulfill its contribution to the government betting duty and continue its support for the sports community.

Yours Sincerely,



Tony Wong
Marketing Director
Eastern Athletic Association Basketball Team Limited

7 August 2023

The Secretariat
Betting and Lotteries Commission
13/F, West Wing, Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

Dear Sir / Madam

Support for HKJC'S Proposals of Additional Horse Racing Betting Activities

1 We refer to the Proposals of Additional Horse Racing Betting Activities submitted by the Hong Kong Jockey Club (HKJC) to the Betting and Lotteries Commission with regards to increases in simulcast races and number of non-local races on each simulcast day with effect from racing season 2023/24.

2 Singapore Pools (SPPL) is a close working partner with HKJC. Since September 2000, Hong Kong races have been simulcasted in Singapore; first via the Singapore Turf Club, and subsequently by SPPL from 2019 onwards when the betting function was transferred over to the latter. The races command a strong following with the Singapore customers and the simulcast arrangement has been financially beneficial to both HKJC and SPPL.

3 In reciprocity, HKJC utilizes its existing quota to simulcast selected feature races from Singapore every year. This arrangement has provided Hong Kong customers with the opportunity to develop interest and bet on Singapore races.

4 SPPL would like to express its support towards HKJC's Proposals with the following:

.1 simulcast reciprocity allows horse racing clubs and operators around the world to share their 'live' racing signals and data with each other, so that racing fans have the opportunity to enjoy and place wagers on non-local races via legalized wagering channels;

.2 it allows operators to offer a more comprehensive line-up of racing products to their customers, who are able to access a wider variety of races and betting pools from around the world;

.3 operators will gain from revenue increases by attracting new customers which translate to higher returns back to their local government and racing industry; and

SINGAPORE

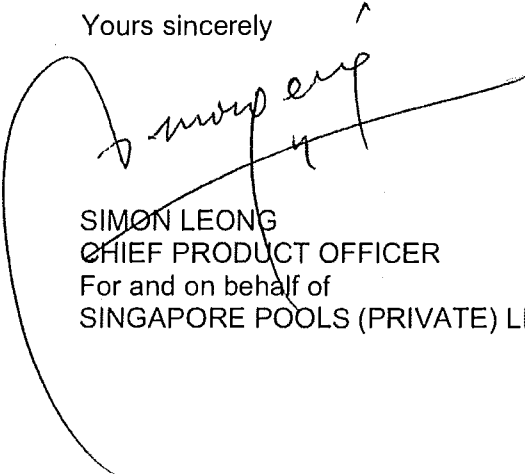


*For Community
Purpose and Benefit*

.4 reciprocity arrangements help build stronger relationships between different racing venues and foster closer cooperation within the racing industry which is vital towards sustaining and growing the collective franchise around the world.

5 The reciprocal arrangement between HKJC and SPPL has brought mutual benefits to the collaborative partnership over the past decades. We are confident it would be in HKJC's good stead to further broaden its simulcast portfolio to bring the best of the world's racing to its Hong Kong customers with the new Proposals.

Yours sincerely



SIMON LEONG
CHIEF PRODUCT OFFICER
For and on behalf of
SINGAPORE POOLS (PRIVATE) LIMITED



maintaining the integrity of the sport of horseracing

7 August 2023

Secretariat to the Betting and Lotteries Commission
13/F., West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

By email : ha2@hyab.gov.hk

Dear Secretariat

We understand that the Betting and Lotteries Commission is currently considering an application from The Hong Kong Jockey Club ("HKJC") to increase the number of simulcast races and to increase the number of maximum races on a simulcast day.

The National Horseracing Authority of Southern Africa ("the NHA") wishes to express our support for the HKJC's application, and to share our views with the Commission on the importance of supporting racing simulcasts.

The National Horseracing Authority of Southern Africa

By way of background, the NHA is the regulator of the sport of thoroughbred horse racing in Southern Africa and serves to promote and maintain the integrity of racing in our country. The objectives of the NHA are to:

1. regulate the sport of horseracing;
2. govern the sport with integrity;
3. serve the industry through excellent, efficient and effective administration of amongst others, the Stud Book, registrations, licensing, race day services and laboratory services;
4. promote and/or encourage the promotion of the sport of horseracing, the quality of the thoroughbred, industry training and skills development; and
5. promote and foster co-operation and goodwill with recognized authorities, governments and other relevant stakeholders.

The racing and breeding industry in South Africa has enjoyed a long and mutually beneficial relationship with the HKJC. Our breeders have produced many high-quality thoroughbreds which have raced with great success in Hong Kong. The HKJC is providing funding support for the South African Equine Health and Protocols (NPC) with direct export of South African-bred horses.

South Africa has been very happy to provide the simulcast of major race meetings into Hong Kong, such as the "Met Day" held at our Kenilworth racecourse in Cape Town in January 2023 & also the HKJC World Pools Gold Cup race meeting at Greyville Racecourse on 30 July 2023. Such simulcast arrangements are of significant value to both racing authorities, and also serve to raise the profile of racing internationally, which is critically important to our sport.

The benefits of international simulcast

South Africa has enjoyed an exceptionally strong relationship with the HKJC. We are proud to have witnessed some of our leading trainers and jockeys make the transition to succeed in the highly competitive racing scene in Hong Kong. As noted, this relationship has also included the chance to showcase South African racing through the simulcast of some of our major races into Hong Kong for the entertainment of Hong Kong's racing fans. By providing greater insight into international racing through simulcast, fans are given the opportunity to appreciate the jurisdictions from which some of the stars of Hong Kong racing have emerged and build a closer tie between our respective industries.

Of course, simulcast arrangements also provide financial benefits to the host racing body (and related entities) and the receiving body (here, the HKJC) in the form of increased revenue from wagering. In turn, this provides greater taxation revenue for both governments, which would not be available in the absence of the simulcast.

The growth of international interest in racing is, overwhelmingly, a positive development for our sport. We believe that to capitalize on this interest, racing authorities and governments must work together to provide the necessary conditions for the broadcast of international racing, and for legal betting to occur on that racing.

It is also important to note that South Africa has been unable to export directly to most countries. Horses currently have to embark on an arduous journey that takes a minimum of 5 months via Mauritius to reach Hong Kong as they have to endure, 21 days pre-export quarantine in South Africa, 3 months quarantine on the Indian Ocean Island of Mauritius. Between 30 - 60 days of residency in Europe before further travel. Despite this, our breeders have produced many high-quality thoroughbreds which have raced with great success in Hong Kong.

Embracing opportunities, like simulcasting, to support and grow our industry is critical for the long-term sustainability of our sport. South Africa has made great strides towards resolving the issues and the onerous export requirements. The successful negotiation of direct exports will unlock the R1-billion per annum equine export industry. We have noted an increase of 30% in our exports to Hong Kong over the past three years based on the current simulcasting arrangements. We believe that increasing the number of simulcast days is critical for the long-term sustainability of our sport as it helps to support and grow our industry.

Furthermore, doing so will have a positive impact on the entire equine industry value chain across jurisdictions including Hong Kong, and lift the standards of our sport. Such positives impacts will also lead to greater participation, and further economic and social contribution by racing, to the benefit of our communities.

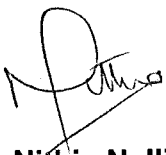
Like other racing jurisdictions around the world, South Africa holds major races between the period 01 November – until 31 July every year. We believe that by increasing the simulcast opportunities as requested by the HKJC and the number of races per day, will have an astronomical economic benefit for both jurisdictions involved and similarly other racing jurisdictions that do partake in the huge, commingled pools. The internationalization of horse racing will be further boosted by this approval.

A further positive outcome from greater simulcast opportunities is that it provides a legal alternative for fans to bet on international racing. The industry in South Africa fears the rise of illegal betting on racing and other sports, and the damage that it does, and will continue to do, to our legal wagering industry and wider society. By providing legal avenues for customers to bet, we are confident that the racing industry can recapture a sizeable share of wagering which has already gone to illegal and offshore wagering entities. The Illegal betting statistics in South Africa are alarming and is growing exponentially. The trend has been profiled in South Africa, and it's believed that the market (illegal) is estimated to be almost 60% of the legal market. Illegal Betting, has decimated the tote in SA, is the major threat to racing and sports Integrity, and by granting the HKJC more simulcast races and meetings, is mitigatory, and will go a long way in combatting this growing pandemic.

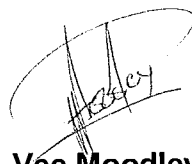
Conclusion

As explained above, the NHA considers that there are a multitude of positives to come from enhancing simulcast opportunities in Hong Kong. In SA, we have already experienced the positives of the extra simulcast races. We would welcome the opportunity to expand on any of the matters above, and hope that the Commission will look favorably upon the HKJC's application.

Yours sincerely



Nithia Nalliah
Chairman



Vee Moodley
Chief Executive



AUSTRALIAN TURF CLUB

Secretariat to the Betting and Lotteries Commission,
13/F, West Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong.

ha2@hyab.gov.hk

Tuesday, 8 August 2023

Dear Sir/Madam,

RE: INTERNATIONAL HORSE RACING SIMULCAST DEVELOPMENT

On behalf of the Australian Turf Club I write to you to express our support for the further regional development of horse racing simulcast between leading racing bodies in Australia and Hong Kong.

As one of the prominent racing organisations in the Asia Pacific region the Australian Turf Club collaborates with a number of international partners, including the Hong Kong Jockey Club, to facilitate the regulated simulcast of racing product in their jurisdictions.

Historically this collaboration has allowed for the development of simulcast in a legal and well-regulated manner that benefits the horse racing customers, racing stakeholders and broader communities in these jurisdictions.

It is often the case simulcast regulations vary from country to country based on the amount of local racing product available and the balance of high quality international racing product permitted for simulcast.

The current arrangement in Hong Kong whereby horse racing simulcast is regulated by the Licence for Horse Race Betting issued by the Hong Kong Government is an example of a regulated simulcast agreement delivering mutual benefits to both jurisdictions.

In most jurisdictions however there is also a mechanism in place for regular review of the simulcast agreements in order to adjust or expand the amount of racing product exchanged based on changing industry requirements, customer trends and the ever present need to combat leakage to illegal wagering channels.

Due to the increasingly global nature of racing, at the elite level of the sport there is a growing need for racing jurisdictions to be able to exchange simulcasts of their major races to promote the sport and to meet the demand of a global fan base.

This exchange via commingling of wagering pools has proven very successful in the past decade by enabling Racing Authorities to manage the expansion for benefit of industry and Government. There are currently discussions in many racing jurisdictions regarding wagering reviews and the need for future flexibility in simulcast agreements going forward.

Australian Turf Club has been supportive of any review of simulcast agreements in the past as this has allowed for a well-structured assessment of the number of simulcast opportunities exchanged and for the most relevant regulations to be reflected in these agreements.



AUSTRALIAN TURF CLUB

Any future review of the simulcast arrangements between Hong Kong and Australia conducted by the Hong Kong Home Affairs Bureau would seem to have a number of factors to consider, with largely positive potential outcomes for all parties including;

- Channeling betting demand back from illegal operators to HKJC's legal channels;
- Creating additional betting tax revenue and charities donations to Hong Kong;
- Allowing HKJC to simulcast valuable and prestigious overseas and international races that are held around the world, in particular when they occur in two jurisdictions on the same day
- Facilitating simulcast and commingling development among HKJC and other racing jurisdictions;
- Encouraging participation of Hong Kong connections in overseas races and over the longer term facilitate the awareness that drives future participation form international connections in Hong Kong

A key learning from the COVID pandemic was international cooperation is increasingly important, in particular between those jurisdictions with strong racing economies. With so many changes affecting the global racing calendar during that time we are pleased the Australian Turf Club has been able to continue to assist Hong Kong in meeting the commitments of our simulcast agreement and Australian horses travelling to Hong Kong.

As always we wish to reiterate the Australian Turf Club highly values our relationship with the Hong Kong racing industry and we sincerely hope Hong Kong racing continues with all those participating remaining safe and well, during this most challenging time.

Representatives of the Australian Turf Club look forward to travelling to Hong Kong in 2023 to progress our strong relationship with the key industry bodies.

Should you have any further questions regarding the above please do not hesitate to contact us directly.

Yours sincerely
AUSTRALIAN TURF CLUB LIMITED

Peter McGuaren
Chairman



RACING AND WAGERING WESTERN AUSTRALIA

8 August 2023

Betting and Lotteries Commission
2 Tim Mei Avenue
13/F, West Wing
Tamar
Hong Kong

E-mail: ha2@hyab.gov.hk

Attention: Secretariat to the Betting and Lotteries Commission

Dear Sir/Madam,

RE: The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

Racing and Wagering Western Australia (**RWWA**) is the controlling authority for thoroughbred, harness and greyhound racing in Western Australia (**WA**), together with the responsibility for off-course TAB (totalisator) wagering.

RWWA is uniquely placed as a pooling partner of The Hong Kong Jockey Club (**HKJC**) on Hong Kong, Western Australian and international racing via simulcast reciprocity.

Simulcast reciprocity is a system that allows racing and wagering operators to share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations via legalised wagering channels.

Simulcast also allows operators to offer a more comprehensive wagering menu to their customers who are in turn able to access a wider variety of races and betting pools.

Earlier this year, The HKJC simulcast the Western Australia Turf Club (**WATC**) Derby from Ascot racecourse. An increase to the number of races simulcast by HKJC from Western Australia, will significantly benefit the WA racing industry through additional funding by attracting customers that wouldn't normally have access to WA thoroughbred racing content.

Finally, simulcast reciprocity agreements can benefit operators in several other ways. It can help build relationships between tracks and foster cooperation within the racing industry, and to reduce the costs associated with producing and broadcasting live racing signals, as operators can share the costs of production and distribution.

RWWA supports the proposals by The HKJC and thanks the Betting and Lotteries Commission for their consideration.

Should you require further information please contact me directly at

Yours sincerely,

Ian Edwards
Chief Executive Officer

End.

本會檔号：LTR_20230801

香港添馬添美道 2 號
政府總部西翼 13 樓
博彩及獎券事務委員會主席
葉振都先生 BBS, MH, JP
[電郵: ha2@hyab.gov.hk]

葉振都主席：

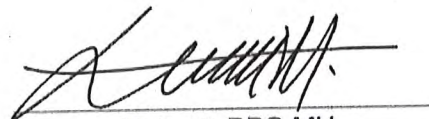
有關「香港賽馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次」
之意見

香港地區體育會聯會完全支持馬會的建議，增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次，現附上我們的意見，以供委員會參考。

香港地區體育會聯會成立於 2021 年，目的為代表各區的地區體育會與社會相關持份者進行聯繫，並爭取支持，致力成為地區體育會與政府及相關部門之聯繫橋樑，以及協調各體育會，爭取更多資源推廣體育活動。

香港賽馬會各類社區體育活動捐款讓社區體育團體有足夠資源推廣地區體育，對本港地區體育發展貢獻良多。就現時香港賽馬會建議增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次，本會認為這有助打擊市民從非法平台進行投注，亦可以穩定香港賽馬會的博彩收入，供香港賽馬會透過博彩稅作出貢獻並維持其在社會上的慈善捐贈，因此本會對有關建議表示完全支持。

主席



楊位醒 BBS, MH

2023 年 8 月 7 日



香港賽馬會增加賽馬博彩活動的建議


對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及(ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

贊成增加賽馬博彩活動。

姓名 : 迪倫

所屬機構(如適用) : 北區體育會

日期 : 08. 08. 2023

簽署 : 

註：請細閱後頁個人資料收集聲明。



Mr Adrian Yip
Chairman
Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

Via email ha2@hyab.gov.hk

8 August 2023

Dear Mr Yip

The Hong Kong Jockey Club's Proposals for Additional Simulcast Races

I am writing to you in relation to the recent proposal submitted to you by The Hong Kong Jockey Club (HKJC) regarding an adjustment to the regulations for the simulcast of non-local racing.

Firstly I would like to introduce myself as CEO of Racecourse Media Group Limited (RMG).

By way of background, RMG is the leading horseracing media and betting rights organisation in the UK and Ireland. We are owned by 35 leading UK racecourses which ensures that 100% of the profits we generate goes directly back to racecourses to fund the industry and RMG is the single largest source of funding to horseracing in the UK.

RMG's leading stakeholder is The Jockey Club, which operates world renowned racecourses such as Epsom, Newmarket, Aintree and Cheltenham.

There are a range of areas in which I believe that HKJC's proposal to you is of fundamental importance to the development of horseracing around the globe:

1) Internationalisation

HKJC's initiative in pioneering World Pool for simulcast has been a key strategic development in the internationalisation of horseracing.

Due to the nature of horseracing it has no recognised world championship to provide a platform for internationalisation of the sport. This, compared to other sports, has been an inhibitor to the growth and development of the industry. However, HKJC's innovation with the World Pool has for the first time created a platform that links in a single product the world's leading races, horses and jockeys. This provides a powerful proposition for the sport to become more internationalised and grow its reach around the world.

Not only does internationalisation help grow consumer interest but it also aids the growth in the traffic of high quality racehorses between territories and thus provides added interest to the events.





2) Illegal Betting

As the rightsholder, we are very cognisant of the high level of illegal and offshore betting that takes place in the Far East on our content and which denies funding to our industry.

Accordingly, we believe that HKJC's initiative to increase the simulcast of important and high quality races will provide racing fans with a legitimate route to bet on these races and which will thus help reduce the volume of illegal offshore betting.

We believe strongly that one of the key mechanisms for reducing illegal betting is to provide horseracing fans with high quality and legitimate access to betting as a better alternative to illegal offshore sites.

3) Development

The additional revenues generated by World Pool simulcast races is an important driver of incremental revenues which are re-invested by our racecourses to develop the quality of horseracing and which helps deliver sustainable development for the horseracing industry.

4) Consumer Proposition

The development of World Pool means that racing fans around the world are now able to be provided with a high quality schedule of international races alongside an innovative betting product that for the first time aggregates large pools. This will help widen interest in horseracing and will support the sustainable development of the sport.

5) Reciprocity

Simulcast reciprocity benefits operators in a number of ways. It helps build relationships between racecourses around the world and fosters cooperation within the racing industry, whilst reducing the costs associated with producing and broadcasting live racing signals, as operators can share the costs of production and distribution.

We are very supportive of HKJC's submission to you since we believe that this provides an important opportunity for World Pool to lead the next phase of development for the global racing industry.

I do hope that you find this letter helpful in your assessment of HKJC's submission to you. Should you have any questions regarding this, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "Martin Stevenson", is written over a large, stylized, circular scribble or watermark.

Martin Stevenson

CEO

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及(ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

黃大仙區康樂體育會(康體會)對香港賽馬會(賽馬會)增加賽馬博彩活動持正面開放及支持取態。首先, 康體會明白是次建議原意主要為增加現時活躍投注組群人士的可參與節數和選項, 未必會顯著擴大投注人口及／或導致博彩年輕化、過度化的趨勢現象。

其次, 相信此舉可穩固馬會本質業務上的收入, 持續不斷造福回饋社會。特別是對增加地區體育會的資源投放及多元 (精英及普及化) 贊助。同時多元增加本地生產總值及海外收益；另外, 相信建議亦能有效打擊並轉移非法博彩, 達至多贏局面。

最後而最重要, 作為地區體育會, 希望是建議增加聯播及博彩活動, 日後能擴展至本港職業運動聯賽, 增加公眾的認知和信心, 為日後球類博彩合法化創造條件。

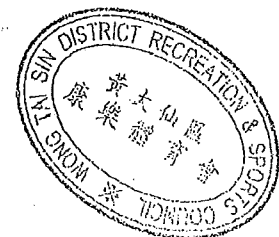
姓名：袁國強

所屬機構（如適用）：黃大仙區康樂體育會

日期：2023年8月8日

簽署：袁國強

註：請細閱後頁個人資料收集聲明。





Secretariat to the Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
HONG KONG

08/08/2023

Dear Sir/Madam,

Newbury Racecourse is an independent horse racing venue in the UK. We are a small, listed plc which has hosted horseracing since 1905. For the first time in 2023, we were able to include two of our most prestigious flat races into the World Pool, this allowed us to share our live signal with other horse racing operators in other jurisdictions including into Hong Kong. We were particularly grateful to the HKJC for all of their assistance in making this happen which was a huge honour for our racecourse.

There are significant benefits for our customers in having races in the World Pool, allowing our customers to access a wider variety of betting pools with much stronger markets than we could achieve domestically. This makes our betting products more attractive and attracts new customers and increased engagement with our sport. At a macro level having this reciprocated multiple times across the year creates significant savings for all racing operators and can build a compelling product that keeps our customers using legalized and regulated betting opportunities.

This in turn generated increased revenues for our racecourse which we were able to directly reinvest into the prizemoney offered on the day benefiting the horseman and helping sustain our industry. We believe this is a huge opportunity that the major racing nations must harness.

Should anyone at the secretariat require any more information or discuss this matter further with us we would be delighted to assist.

Your faithfully,

Julian Thick
CEO, Newbury Racecourse plc

Buenos Aires, 3 August, 2023

Secretariat to the Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong

To Whom it may concern:


Our company is the leading distribution company of Latin America for horse racing simulcasting races among Latin American the United States, Europe, Australia and many other important regions of the world.

Simulcast reciprocity is a system that allows horse racing operators to share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations via legalised wagering channels.

In this way, simulcast reciprocity agreements can benefit operators in several ways. It can help to reduce the costs associated with producing and broadcasting live racing signals.

We are in full support of the Hong Kong Jockey's Club proposal and we think that it is important to increase the number of simulcast races on a simulcast day between Hong Kong and Latin American Horseracing.

Sincerely,

A handwritten signature in black ink, appearing to read "Horacio Esposito".

Horacio Esposito
Vice-President



**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

The Association is writing to express our support for HKJC's proposals for both increasing the maximum number of simulcast races from 10 to 25 and increasing the maximum number of non-local races per one simulcast day from 9 to 12.

Firstly, the Hong Kong Jockey Club Charities Trust's donation is one of the key funding sources to the social service sector. As one of the beneficiaries of the Trust, we witness the Trust's donation fill important service gaps that the Government or other funding sources cannot immediately or fully cover such as pilot service projects. We believe that increasing simulcast races would lead to an increase in business, which in turn will translate into more donations to the Trust. Thus, social service sectors would be able to fill up the service gap in society more comprehensively.

Secondly, the Trust also valued innovation and technology which always provide resources to motivate social service sectors for service advancements such as facilities enhancement projects and centre renovation projects. With more funding distributed to the Trust, it could allocate more resources to support innovative and technological projects which would benefit the public at large or specific groups, and be in line with government policies.

Moreover, it is widely known that the Trust always responds to the social situations promptly. We highly appreciated that during the serious outbreak of COVID-19 in 2021, the Trust quickly provided a one-off subsidy to the agencies to purchase suitable equipment or service packages to enhance our preparedness and capacity to operate with agility in the "New Normal". It is believed that the Trust would continue to support society's hardship if more funding is allocated to the Trust.

To sum up, the Association is in favor of the proposal and we believe that it will bring positive impacts to society when the number of simulcast races is raised.

Name

: Mr. Thomas CHU

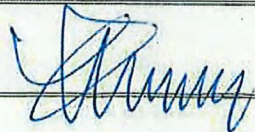
Representing organisation (if applicable)

: New Life Psychiatric Rehabilitation Association

Date

: 8.8.2023

Signature

: 

Note: Please read the Personal Data Collection Statement on the next page.



沙田文藝協會有限公司
Sha Tin Arts Association Limited

香港添馬添美道2號政府總部西翼13樓
(博彩及獎券事務委員會秘書處收)

敬啟者：

香港賽馬會對社區的公益工作

香港賽馬會在香港的慈善工作及對香港社區的建設是肯定的。眾所週知香港賽馬會透過其慈善信託基金，每年捐款資助多個社區項目，為有需要人士提供支援；並適時開展項目，為社會長遠發展作出貢獻。

據資料顯示香港賽馬會於2021/22年度，透過稅款及慈善捐款將336億港元的博彩及獎券收入（或總博彩收入418億港元中的大約80%）直接回饋香港。過去本會亦為受惠機構。

本會所舉辦的，被譽為歌唱比賽界殿堂級的超新聲歌唱大賽（沙田），多年來獲香港賽馬會支持。超新聲歌唱大賽（沙田）令年輕人找到自己潛質的所在：如聲夢傳奇的炎明熹、英皇新秀黃明德、獲十大傑青的失明女傑青蕭凱恩、第一位獲邀遠赴維也納金色大廳舉行個唱的女高音歌唱家鄭穎芬、全港最受歡迎歌唱導師之一的劉濤，更有多位參賽者最終在歌唱界從事教學工作……等，都是因超新聲歌唱大賽踏上新的里程碑。政府近年積極推廣年輕人上游的機遇，超新聲歌唱大賽正好給年輕人一個好機會。

本會深明政府因應對財赤，向馬會徵收 120 億稅項的做法。惟從長遠來看，倘馬會無法增加收入，或無法確保不會對社區活動的贊助產生影響。

本會期望香港政府與香港賽馬會在開拓新項目的收益上，或在稅收上作出協調，不致繼續影響香港賽馬會對社區的慈善工作！謹謝！

此致

博彩及獎券事務委員會秘書處



沙田文藝協會
主席洪細君 謹啟
(總幹事 林麗純 代行)

2023年8月9日

To: [HA2/HYAB](#)
Subject: Response to The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities
Date: 2023年8月9日 14:23:24

Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.,
Chairman, Betting and Lotteries Commission

9 August 2023

Dear Mr IP,

Response to The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

We are writing on behalf of Lingnan University (LU) to express our perspective regarding the proposal put forth by the Hong Kong Jockey Club (HKJC) to raise the maximum number of simulcast races per year and increase the maximum number of non-local races per simulcast day from nine to 12.

The HKJC holds a prominent position as a philanthropic organization in Hong Kong, actively contributing to the continuous development of our community and the enhancement of public welfare. Through its distinctive operational model, which allocates surplus funds from racing to benefit the community, the HKJC has made substantial donations through The Hong Kong Jockey Club Charities Trust (the Trust). The Trust's charitable projects encompass various areas, including Community Services, Education and Training, Medical and Health, as well as Sports, Recreation, and Culture.

The Trust has a longstanding history of supporting the educational advancement of Hong Kong, with LU being one of the fortunate recipients of its generous contributions. In addition to providing donations for the construction and refurbishment of student hostels and offering student scholarships, the Trust has also made significant contributions to support diverse research and community service initiatives. These include the Health and Financial Education Programme for Retirees and Older People, Gerontechnology and Smart Aging Project, Age-friendly City Project, as well as the ICH+ Innovate Heritage Education Programme.

The HKJC's proposal to increase the maximum number of simulcast races per year from 10 to 25 and to expand the maximum number of non-local races per simulcast day from nine to 12 is expected to yield several benefits. These include generating increased betting duty per season, creating over a thousand job opportunities, and generating additional revenue for charitable donations. Furthermore, this proposal is anticipated to have minimal impact on young individuals, while also providing a legal avenue for betting that helps combat illegal gambling facilitated by unauthorized or offshore bookmakers. Therefore, we support this proposal.

Thank you for your attention.

Amy Leung
Director
Office of Institutional Advancement and Public Affairs
Lingnan University



**ORGANIZACIÓN SUDAMERICANA DE FOMENTO
DEL SANGRE PURA DE CARRERA**

Buenos Aires, August 3rd, 2023

Secretariat to the Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong

Dear Sirs,

The South American Organization for the Promotion of Thoroughbred (OSAF) was created in 1958 with the need of creating a stronger bond with horse racing organizations in the region, controlling, promoting and improving the quality of races in South America.

We think that getting a greater number of Latin American races will allow operators to offer a more comprehensive wagering menu to their customers and wagering customers to be able to access a wider variety of races and betting pools, and it also provides a way for horse racing operators to increase their revenue by attracting new customers. This will be an important starting point for the future of our South American horses.

It will be an important issue for us if you could approve the proposal of the Hong Kong Jockey Club and allow having a greater number of Latin American races in your simulcast. It will be greatly appreciated.

Sincerely yours,

Oscar Bertoletti
CEO

張仁良教授 銀紫荊星章, 太平紳士,
Officier dans l'Ordre des Palmes Académiques
校長 | 公共政策講座教授

Professor Stephen Y L Cheung SBS, JP.
Officier dans l'Ordre des Palmes Académiques
BSc CUHK, PhD Paris VI, PhD Strathclyde
President | Chair Professor of Public Policy

7 August 2023

Mr. YIP Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman
Betting and Lotteries Commission
Home Affairs Bureau
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Hong Kong

Dear *Adrian*

**Hong Kong Jockey Club's proposals
to increase the maximum number of simulcast races per racing season
and increase the maximum number of overseas horse races per simulcast day**

On behalf of The Education University of Hong Kong, I write to register our deep gratitude to the Hong Kong Jockey Club (HKJC) for its continuous support to our educational initiatives and community projects. With the generous donations from HKJC, the University is able to embark on different creative and impactful projects, such as *The Jockey Club From Word to Culture Programme: An Animated Way to Learn Chinese* which uses multimedia teaching materials and animations to cultivate junior form students' interest in Chinese characters and culture; the *HKJC Charities Trust-initiated CoolThink@JC Project* which promotes computational thinking education to strengthen students' problem-solving skills; *Jockey Club Animated Classical Chinese for Curious Minds Project* which promotes effective learning of Classical Chinese in primary schools through animation and multimedia learning experience; *KeySteps@JC Project (Phase Two)* which provides holistic services for underprivileged children and their families in Hong Kong; and *Jockey Club Experiential Learning Project for Students with Special Education Needs (Phase Two)* which fosters a supportive career life planning ecosystem for students and graduates with intellectual disabilities.

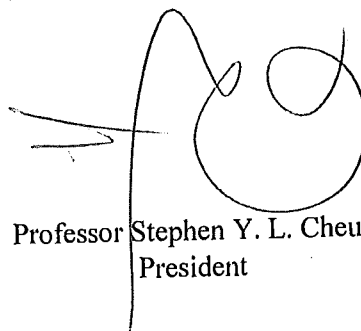
HKJC, being one of the world's largest and most successful philanthropic organizations, as well as one of Hong Kong's most iconic and global brands, has been a long-term and profound supporter to the betterment of the society through their community and social contributions. With its unique integrated business model, HKJC has been successfully turning their betting revenues into charities donations. The well-established tripartite partnership between the government, HKJC and NGOs greatly contributes to the establishment of a caring community. HKJC's Charities Trust not only assists NGOs in identifying social needs, but also provides financial support to a wide range of forward-looking community and educational projects for the disadvantaged and needy sectors, as well as filling the service gaps to build stronger communities in Hong Kong.

HKJC is our passionate and committed partner to serve the society. We consider that flexibility should be allowed for HKJC to sustain and enhance its business with the ultimate goal to convert their betting revenues into social good causes.

We believe that the HKJC's proposals of increasing the maximum number of simulcast races per racing season and increasing the maximum number of overseas horse races per simulcast day could help HKJC to expand its contribution to society, to charities, and to the positive development of Hong Kong.

It is very much hoped that the Betting and Lotteries Commission could give favourable consideration to HKJC's said proposals.

Yours Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'S' followed by a circular flourish.

Professor Stephen Y. L. Cheung
President

Address: 13/F, West Wing,
Central Government Offices,
2 Tin Mei Avenue, Tamar, Hong Kong
(Attention: Secretariat to the Betting and Lotteries Commission)
Fax No.: 2591 6002
E-mail: ha2@hyab.gov.hk

Annex II

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

We support the content of the proposal. Should the Simucast Arrangement not be improved, the illegal gambling activities which indeed improves constantly will overtake the legal gambling market, the money will go to the triad behind the illegal activities and the money derived will not be applied properly to assist the development of the social needs and/or to overcome the problems created by the gambling itself. We need to face the music and take instant action to improve the Simucast Arrangement without further delay.

Date

9 August 2023

Note: Please read the Personal Data Collection Statement on the next page. [Read]

Please do not publish our names [both my name and the organisation] in this submission to the media and the public.



大埔青年協會
TAI PO YOUTHS ASSOCIATION

博彩及獎券事務委員會
葉振都主席

有關馬會增加賽馬博彩活動建議提交意見

大埔青年協會成立逾二十五年，以「提高青年愛國愛港的意識，鼓勵青年參與社區事務」為宗旨，提供不同類型青年活動及社區服務，培育青年的正向思維。

馬會多年來於社區發展擔當重要角色，透過其慈善信託基金捐助不同機構，惠澤社群。本會知道馬會一直支持青年發展，早前撥款興建位於大埔林村的賽馬會愛丁堡公爵訓練營，為青年人提供營地設施及戶外歷奇訓練活動，鼓勵青年開拓多元潛能，促進全人發展。此外，馬會在疫情期間推行和支援多項兒童及青年計劃，包括在家學習寬頻計劃、賽馬會平行心間計劃等，照顧他們的身心健康。

根據馬會所提交的資料，年輕賽馬投注者只佔極少數，加上馬會嚴格執行多項有節制博彩措施，相信對年輕人影響輕微。若委員會通過馬會增加聯播日及聯播賽事，不但有助配合政府打擊外圍，防止青年、甚至未成年人士參與非法賭博活動，更可為社會帶來額外慈善貢獻，投放更多資源擴展青年發展工作。

因此，本會支持馬會增加賽馬博彩活動建議，以打擊非法外圍和增加收入支持慈善活動。如有垂詢，敬請賜電 與大埔青年協會秘書處黎小姐聯絡。



大埔青年協會主席
麥成灝 謹啟

2023年8月9日

香港添馬添美道2號
政府總部西翼13樓
博彩及獎券事務委員會主席
葉振都先生

葉主席：

有關「香港賽馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次」之意見

獅子山文藝協會（下稱「本會」）成立於2021年，是一個由香港國學家、書法家、畫家、文學家等組成的非牟利慈善團體，並以推廣我國優秀傳統文化為宗旨；除傳統文化活動外，本會亦不時舉辦不同類型文化表演及交流等社區活動，培養大眾對藝術創意和欣賞文化藝術的能力，藉此提高市民的生活質素。

本會留意到香港賽馬會（下稱「馬會」）建議政府增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次，即每年同步聯播賽事上限由10場增加至25場及每個同步聯播日的非本地賽事場數上限由九場增加至12場，本會支持馬會建議。

香港賽馬會慈善信託基金是位列全球十大的慈善捐助機構，不但支持教育、醫療、體育及青年發展等不同類型的社區項目，亦對文化發展不遺餘力，當中包括撥款支持活化大館及興建故宮文化博物館等大型文化基建，對推動本港文化發展的貢獻建樹良多。除了大型的文化建設項目外，今年6月，本會曾參與合辦一個名為「非洲鼓樂與民共樂慶回歸」的地區活動同樣獲得馬會慷慨贊助，讓接近200名深水埗區的小朋友、家長及街坊一同學習及試玩非洲鼓樂。活動成功推廣非洲鼓樂文化之餘，亦有助參加者舒緩情緒，對社區及家庭和諧和個人精神健康作出貢獻。

面對非法外圍莊家的長期挑戰，馬會的博彩收入無可避免受到影響，從而連帶影響馬會投放於慈善項目的資源。本會相信如是次增加同步聯播賽事及場次的建議獲批，馬會將能提升競爭力以打擊非法博彩活動，將流入非法博彩的資源納入正軌，讓馬會能投放更多款項支持文化藝術推廣工作。

祝
工作順利！

For and on behalf of
LION MOUNTAIN CULTURE AND ART ASSOCIATION COMPANY LIMITED
獅子山文藝協會有限公司

Authorized Signature(s)

[簽名/蓋章]
獅子山文藝協會
李堃銘主席

[日期] 9/8/2023



博彩及獎券事務委員會

葉振都主席台鑑：

馬會增加賽馬聯播建議之看法

香港聲之動力藝術協會（簡稱“聲之動力”）得悉 貴委員會正就上述事宜諮詢公眾。現謹附上聲之動力的看法，以供 貴委員會參考。

聲之動力由一班熱愛歌唱及表演的人士於 2011 年創立，透過舉辦各類型音樂活動，鼓勵熱愛音樂的友好多參與公眾慈善活動，我們過往亦舉辦過例如探訪老人院、青少年中心、獨居長者及舉辦義賣及賣旗活動等。「聲之動力流行曲歌唱大賽」更已成為我們的招牌活動，以表演及娛樂的方式為社區注入正能量，同時培養青年人對社會承擔的意識。

聲之動力明白博彩是一個具爭議性的題目，對於馬會今次建議增加賽馬聯播的建議，相信各界的看法亦比較多元化。作為一個長期與青年人接觸的團體，聲之動力必需在此聲明，我們並不鼓勵青年人過早接觸博彩。然而，聲之動力留意到青年人對投注賽馬賽事的興趣遠比其他年齡層人士低，據報章報道，逾八成投注馬會同步聯播賽事者人士主要是中年人或以上年齡層。因此聲之動力認為馬會今次建議對年輕人帶來的影響相對較輕微。

聲之動力認為一旦是次建議獲 貴委員會接納，馬會在未來的財政年度的收入亦理應相應增加，更應理所當然地投放更多資源予年輕人身上，推出以年輕人為對象的項目，例如馬會早幾年一次過撥款 5 億元推出專為 15 至 21 歲青少年而設的生涯規劃以及「賽馬會運算思維教育」計劃等。馬會慈善部門日後是否又可以考慮推出前往海外或大灣仔區的暑期活動計劃呢？正如國家主席習近平所言：「青年興，則香港興；青年發展，則香港發展；青年有未來，則香港有未來」。

馬會除了是全港最大的慈善機構，亦與地區團體合作推動社區發展，聲之動力作為以灣仔區為服務大本營的團體，過去幾年亦與馬會緊密合作。我們透過申請馬會的社區贊助，成功舉辦演唱會、舞蹈及歌唱比賽，為社區帶來歡樂氣氛。疫情肆虐期間，在防疫物資供不應求的情況下，幸得馬會支持，本會成功向區內清潔工人、大廈管理員及獨居長者派發防疫物資，為基層市民雪中送炭。因此聲之動力希望 貴委員會積極考慮批准馬會是次建議。感謝垂注。

祝

身心康泰！



香港聲之動力藝術協會

2023年8月10日

Sing's Power



Comisión Directiva

Buenos Aires, August 9th. de 2023.

Secretariat to the Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong

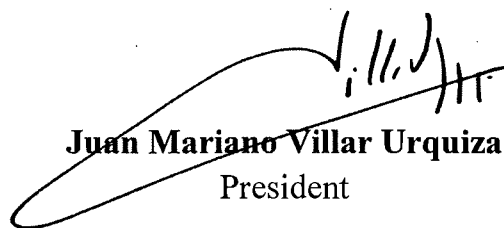
Dear Sirs:

The Jockey Club San Isidro is the main racecourse in South America. It was founded in 1882 by the former Argentine President Dr. Carlos Pellegrini with the objective to rule horseracing in Argentina.

It will be important for us to have simulcast agreements that can benefit operators in several ways. It can help to build relationships between racetracks and foster cooperation within the racing industry, and to reduce the costs associated with producing and broadcasting live racing signals, as operators can share the costs of production and distribution.

We support the Hong Kong Jockey's Club submission and would appreciate it if you could increase the import races for your market.

Yours truly,


Juan Mariano Villar Urquiza
President



15 August 2023

13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

VIA EMAIL: ha2@hyab.gov.hk

Attention: Secretariat to the Betting and Lotteries Commission

On behalf of the Board of The Western Australian Turf Club ("the Club") and following the request of the Betting and Lotteries Commission ("BLC") for Submissions of Views, I would like to offer our opinions on the proposal lodged by The Hong Kong Jockey Club to the HKSAR Government requesting "Increasing the Maximum Number of Simulcast Races per year and Increasing the Maximum Number of Non-local Horse Races per Simulcast Day Submitted."

Like many racing clubs around the world, we are passionate about promoting the sport of horse racing as widely as possible. One avenue available is increasing the availability and distribution of horse racing broadcasting vision, allowing racing fans across multiple locations to witness the best quality racing our industry has to offer. This also presents opportunities for fans to wager on different events across multiple jurisdictions.

Collaboration between race clubs and the simulcast reciprocity allows us all to showcase local talent to the rest of the world, while at the same time allowing clubs to financially benefit from increased wagering opportunities. This financial benefit is in turn invested into the industry, ensuring the sustainability of world class racing.

In addition, when such broadcasting reciprocity agreements are in place, it can help to build relationships between different race clubs across the world, fostering an increased level of cooperation within the racing industry and helping to ensure best practices are shared. This can assist many clubs to actively drive continuous improvements in all aspects of their operations.

We as a Club would support any arrangements, including increased sharing of live racing vision, that contribute to the promotion of the horse racing industry to both existing and new participants around the world.

Yours sincerely

Mr James Oldring

Chief Executive Officer
Western Australian Turf Club t/a Perth Racing

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及(ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

本人和藝育菁英基金會支持馬會的申請建議：

- (i) 每年同步聯播賽事的上限由10場增加至25場；及
- (ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場。

馬會是一個香港人引以自豪的機構，它對香港的貢獻甚大，包括：香港賽馬會慈善信託基金位列全球十大慈善捐助機構，於2021/22年捐出336億港元的博彩及獎券收入，直接回饋香港。當中包括：261億港元博彩稅及利得稅款貢獻；66億港元已審批慈善捐款；9億港元特區政府的獎券基金貢獻；及19,000個就業機會。

藝育菁英基金會是香港賽馬會慈善信託基金受惠機構之一。通過香港賽馬會慈善信託基金的贊助，香港千多個家境貧困的學生能有機會學習繪畫，進一步提升他們的潛能。而通過香港賽馬會慈善信託基金，香港社會各階層都受益不少。香港賽馬會更是一個開放、廉潔的機構，在世界馬群中享負盛名。任何渠道可以幫助香港賽馬會在國際馬群中，提升參與、爭取領導地位的工作，香港政府都應該支持。

姓名： 方黃吉雯

所屬機構（如適用）： 藝育菁英基金會 - 全港青少年繪畫活動

日期： 2023年8月10日

簽署： 方黃吉雯

註：請細閱後頁個人資料收集聲明。



Council on Anti-Illegal Betting & Related Financial Crime
Asian Racing Federation

Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman
Betting and Lotteries Commission
Home Affairs Bureau
Hong Kong

8th August 2023

Dear Mr Yip,

Re: Proposals of increasing the maximum number of simulcast races per racing season and increasing the maximum number of overseas horse races per simulcast day

The Council on Anti-Illegal Betting & Related Financial Crime (“the ARF Council”) is aware that the Betting and Lotteries Commission is currently considering an application from the Hong Kong Jockey Club (“HKJC”) to increase the maximum number of simulcast races per racing season and increase the maximum number of overseas horse races per simulcast day. We are writing to provide evidence in support of the proposals in order to assist the Commission to consider the proposal’s merits in relation to combatting illegal betting as well as preventing subsequent social harm within Hong Kong society.

As background, the ARF Council¹ was established by the Asian Racing Federation in 2017. The Asian Racing Federation (ARF) is a regional federation comprising 28 national racing authorities and racing-related organisations from across Asia, Oceania, Africa and the Middle East. The ARF council now comprises 24 members from organisations engaged in horse racing, sports integrity, law enforcement, the UNODC, and academia.² The purpose of the ARF Council is to foster and enhance international cooperation among horse racing operators, regulators, intergovernmental organisations and government agencies in order to better combat the threat of illegal betting and other financial crimes to horse racing integrity in particular, and sport in general.

The ARF Council has recognized for many years that illegal betting is a major problem in Hong Kong, as well as across Asia, and increasingly around the world. Illegal betting provides a revenue stream of hundreds of billions of dollars to transnational organised crime groups, and illegal betting on horseracing is a major contributor to this.

¹ <https://www.asianracing.org/aib>

² <https://www.asianracing.org/aib/council>



The ARF Council also recognizes that regulated betting operators such as the HKJC have a role to play in combatting illegal gambling problem. Enforcement is not the only way to combat the illegal bookmaking, as can be shown in Hong Kong, where the HKJC has for many years illustrated how an effective betting product (on racing and other sports) is critical to allow licensed operators to compete against illegal betting markets.

However, with global standards of horse racing internationally now increasingly in alignment, illegal betting has become a global and transnational problem, facilitated by developments in online and mobile technology, digital payment systems and the growing popularity of cryptocurrencies. And while horse racing fans around the world, including in Hong Kong, have become increasingly interested in prestigious overseas races, the absence of legal betting options for many of these races which are not available for them to watch or bet on via a simulcast arrangement, means that they are prone to be attracted by illegal betting channels.

A key means of combatting illegal betting operators is to allow legal licensed betting operators the flexibility to compete appropriately in order to channel demand to a responsible wagering product with appropriate safeguards in place. Given the increasingly globalised nature of both wagering and horseracing, expanding the supply of legal racing wagering options within an appropriate structure can thus divert demand from illegal operators and help combat illegal betting.

To address these problems, the ARF Council believes that increasing the number of simulcast races and overseas races per simulcast day would be an effective and direct approach to continue to combat illegal betting in Hong Kong. This initiative is also a great example to other regulated jurisdictions on how to appropriately enable the licensed and responsible betting operator to effectively compete with the illegal market. If this enabling is not done, the ARF Council fears that illegal betting will increasingly grow and even dominate betting on international horse racing in the Hong Kong betting market, which will, as a result, have a highly negative social impact on Hong Kong and also the HKJC's ability to contribute to Hong Kong society.

We hope that the Betting and Lotteries Commission would give favourable consideration to HKJC's proposal and I would be glad to provide any other supporting information if it is appropriate to do so.

Yours sincerely,

A handwritten signature in black ink, appearing to read "M. Paul", is written below the text "Yours sincerely,".

Chair, Council on Anti-Illegal Betting & Related Financial Crime
Asian Racing Federation

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i)每年同步聯播賽事由 10 場增加至 25 場；及(ii)每個同步聯播的非本地賽事場數上限 9 場增加至 12 場，本會意見如下：

國強足球暨體育會支持香港賽馬會關於增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次的建議。本會致力於社區推廣青少年足球的體育。過去幾年，本會一直使用香港賽馬會沙田馬場第二座看台二樓平台廣場改建為的「沙田馬場波地」作為其中一個訓練基地。本會了解馬會致力將市民的博彩需求重投合法渠道從而打擊非法賭博。我們相信香港賽馬會要有穩定的博彩收入，才可以維持其在社會上的慈善捐贈及進行各項建設，造福社會，惠澤人群。因此，本會完全支持馬會的建議，並希望博彩及獎券事務委員會能夠批准馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次的申請。

姓名：羅國豪
所屬機構及職銜：國強足球暨體育會 領隊
日期：4-8-2023

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及 (ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

我們理解馬會是次建議是基於讓馬會持續發展而提出，建議若被通過，可為其增加收益的同時，亦能相應為社會帶來更多稅收和慈善捐獻，本會予以支持，唯希望馬會能繼續就防止市民沈迷賭博方面推行有效的公眾教育和措施，尤其是向青少年灌輸正確的博彩觀念，協助他們保持身心健康和建立正確價值觀。我們亦期望香港賽馬會慈善信託基金日後能撥出更多捐款予社會及社福發展，透過更多不同的協作和慈善捐助，幫助弱勢社群和有需要人士提升生活質素，回應社會長遠發展所需，積極為香港建構健康、關愛及共融的社會。

姓名 : _____ 李玉芝 _____

所屬機構（如適用） : _____ 聖雅各福群會 _____

日期 : _____ 2023年8月11日 _____

簽署 : _____  _____

註：請細閱後頁個人資料收集聲明。

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及(ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

香港賽馬會慈善信託基金（基金）多年來資助本地不同的社會服務機構，積極推動社會創新項目，為身處不利條件的社群帶來針對性及具備社會效益的項目。過去多年，博彩收益用於創造社會經濟及發揮社會效益，為有需要的社群帶來正面的轉變。穩定及持續的捐款，亦有助社會服務機構為弱勢社群及有需要人士提供持續優質、專業的社會服務，回饋社會。香港小童群益會亦獲基金資助，開展不同的服務，推動社會創新，支援社會上有需要的社群。

就香港賽馬會向政府提出增加每年同步聯播賽事的上限及增加同步聯播非本地賽馬賽事場數的上限，本會理解上述安排對引導合法投注途徑及打擊非法博彩的本意。本會向來關注兒童、青少年及家庭的身心發展，希望政府在批准賽馬會增加賽事播放之餘，必須嚴厲執法，防止十八歲以下青少年參與，透過資助更多相關項目，防止沉溺賭博，影響個人財政、人際社交及家庭關係，甚至對個人情緒及健康帶來的負面影響。與此同時，也促請基金增加財政資源，資助相關項目，就香港的社會服務、文化康樂、體育項目等作出貢獻。

姓名：劉 翀

所屬機構（如適用）：香港小童群益會

日期：2023年8月11日

簽署：

註：請細閱後頁個人資料收集聲明。

11 August 2023

The Chairman
Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

Dear Mr. Adrian Yip

Hong Kong Jockey Club Request For Additional Simulcast Races/Meetings

Gold Circle Propriety Limited ("Gold Circle") through Phumelela Gaming and Leisure for many years enjoyed a fruitful and healthy relationship with the Hong Kong Jockey Club ("HKJC"), and over the last three years, Gold Circle has established a direct relationship with the HKJC for its reciprocal simulcast.

This South African relationship with the HKJC was established during mid-2008, when like the HKJC the South African racing market faced a very similar situation and needed to import additional foreign content to help prevent its residents from betting illegally and to increase the much needed revenue to sustain the racing industry.

Globally, all racing jurisdictions are dependent on the reciprocal simulcast arrangements to assist with the sustainability of their respective racing jurisdictions and other worthy social causes that benefit as a result. This opportunity is created by offering additional legal betting opportunities in the form of additional simulcast content, without the burden of the associated costs of staging the event.

The establishment of the "World Pool" concept by the HKJC on simulcast races has assisted the global market in offering consistent dividends through the merging of bets from a number of jurisdictions globally into a common pool. The commitment by the HKJC to create a unified competitive legal platform through the establishment of a global pool has assisted in the combatting of illegal betting on foreign content, for which we are very grateful and commend the HKJC for this innovation.

The South African Racing Authority is governed by the National Horse Racing Authority of Southern African. This body is a member of the Asian Racing Federation and the International Federation of Horseracing Authorities both of which are chaired by the HKJC. This relationship has assisted with the ensuring the South African racing product is regulated at the highest level.

South Africa being a member of BRICS and in support of its fellow member countries Gold Circle simulcasts all of the 88 HKJC meetings.

Gold Circle fully endorses the HKJC application for additional simulcast races and or meetings.

Yours Faithfully,



Patrick Loker
Acting Chief Executive Officer



HONG KONG, CHINA TENNIS ASSOCIATION 中國香港網球總會

11 August 2023

By Email

Mr. Yip Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman
Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

Dear Mr. Yip,

Re: Comments on proposal of increasing the number of simulcast days and non-local horse races per simulcast day submitted by the Hong Kong Jockey Club to the HKSAR Government

I am writing to you on behalf of Hong Kong, China Tennis Association (HKCTA) to submit comments on the proposal submitted by the Hong Kong Jockey Club (HKJC) of increasing the maximum number of simulcast races from 10 to 25 days races per year and increasing the maximum number of non-local horse races per simulcast day from 9 to 12 races. HKCTA, the national body for tennis in Hong Kong, supports Hong Kong Jockey Club's proposal for the below reasons.

Firstly, the introduction of additional simulcast days will help to curb illegal betting. Regulated betting is effective in controlling the growing illegal gambling industry and HKJC's proposal will help to direct betting through legal channels that can be adequately monitored by the appropriate bodies.

Secondly, the Hong Kong Jockey Club, through the Hong Kong Jockey Club Charities Trust, makes a substantial charitable contribution to society, often filling in gaps which the Government is unable to reach. The increase of additional simulcast races per year and non-local horse races per simulcast day will further both global and local racing business development and revenues, which will in turn increase revenue for charities, benefitting the local community through the donation of operating surplus to the HKJC Charities Trust.

We hope the above comments will be useful in the Commission's evaluation of the proposal.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Philip Mok', written in a cursive style.

Philip Mok
President, Hong Kong, China Tennis Association

To: [HA2/HYAB](#)
Subject: Submission of Views on the HKJC's Proposals of Additional Horse Race Betting Activities
Date: 2023年8月11日 18:56:53

Dear Secretariat to the Betting and Lotteries Commission

I am reaching out as the CEO of Social Career, a non-profit organisation that has been fortunate enough to play a role in supporting volunteerism, philanthropy, and social impact in Hong Kong. Thanks to our collaboration with the Hong Kong Jockey Club, and our understanding of its integrated business model in combination with its close partnership to the social welfare sector, we hope to offer some insights from our perspective.

Support for HKJC's proposal because:

- **Diverting Betting from Illegal to Legal Channels:**
The shift from illegal to legal betting channels not only promotes a safer and more controlled environment for those who partake in horse racing activities but also, by extension, reduces crime and predatory behaviours associated with illegal betting.
- **Economic and Social Reinvestment:**
HKJC's Integrated Business Model is commendable, having channeled a significant percentage of its revenues back into the community through various means, including substantial charitable donations. By endorsing these proposals, there's potential for an increase in funds channeled towards charitable activities, enhancing the overall social well-being of the city.
- **Promotion of Responsible Gaming:**
We acknowledge HKJC's efforts in promoting responsible gambling. Given their commitment, we anticipate that the expanded betting opportunities will not translate into a dramatic rise in gambling-related issues, especially among the youth.

The influence of HKJC's grant on Social Career and our thoughts on the future role of technology in the social sector:

I am sincerely grateful for the invaluable support Social Career received from HKJC. Their grant has enabled Social Career to venture into areas of technology that we might only have dreamt of otherwise. Thanks to their faith in our vision, over 1,000 NGOs now have the means to connect with passionate volunteers more efficiently. And, it's heartwarming to share that, with this assistance, more

than 120,000 kind-hearted individuals have come forward, contributing a cumulative total of over 850,000 hours to better our community.

I personally feel that as we move forward, technology holds immense potential for the social welfare sector. However, nurturing this potential isn't without its challenges. Building resilient technology and infrastructure, particularly for a non-profit organisation like ours, requires significant financial support. We're hopeful and trust in HKJC to continue seeing the potential of projects like ours. Their dedication to the betterment of the social welfare sector will, undoubtedly, usher in a brighter future for all.

Therefore, I support HKJC's proposal in allowing them more flexibility to sustain and enhance their business with an ultimate goal to convert betting revenue into social good causes.

Best regards,

Matthew Tam
CEO

This e-mail may contain confidential and/or privileged information. If you are not the intended recipient (or have received this e-mail in error) please notify the sender immediately and destroy this e-mail. Any unauthorized copying, disclosure or distribution of the material in this e-mail is strictly forbidden.

THE CURRAGH

WHERE CHAMPIONS ARE MADE

Secretariat to the Betting and Lotteries Commission
13/F, West Wing, Central Government Offices,
2 Tim Mei Avenue,
Tamar, Hong Kong.
ha2@hyab.gov.hk

14th August 2023

Dear Sir,

I am writing on behalf of the Curragh Racecourse, Ireland's leading international racecourse, in response to your request for submissions as part of a public consultation on the Hong Kong Jockey Club's proposal for additional horse race betting activities. The Curragh has had a long and positive relationship with the Hong Kong Jockey Club and many horses which have been trained and raced here at the Curragh Racecourse have subsequently gone on to successful racing careers in Hong Kong.

This year for the first time the Irish Derby race meeting at the Curragh was part of the World Pool commingling promotion which is hosted by the Hong Kong Jockey Club, while officials from our racecourse and from the Hong Kong Jockey Club regularly meet and exchange views on best practice on their specialist areas of regulation and administration. The Hong Kong Jockey Club is respected internationally as one of the foremost racing organisations in terms of innovation, regulation and wagering technology.

We understand that the Hong Kong Jockey Club is seeking permission to increase the number of simulcast races which may occur on the same day as a local Hong Kong race meeting and to increase the number of maximum races on a simulcast day to allow greater flexibility.

We would like to record our support for this proposal which is consistent with the increasing internationalisation of horse racing and wagering and will allow fans to enjoy and wager on races from different international locations through legalised wagering channels rather than doing so on illegal markets.

The proposal will allow us to offer a more comprehensive wagering menu to our customers with a wider variety of races and betting pools as well as offering a way to increase our revenue by attracting new customers.

Increased simulcast reciprocity will build international relationships between racetracks, foster co-operation within the racing industry worldwide and reduce costs as operators share the cost of production and distribution of live racing signals.

I understand that the current quotas regarding simulcasting were introduced in 1989, since when the horse racing and wagering landscape has changed completely with a significant increase in international participation and interest in the major races worldwide.

THE CURRAGH
WHERE CHAMPIONS ARE MADE

The current quotas mean that the likelihood of racing fans using illegal channels to wager on races which are not being simulcast is high. By increasing the quotas, the Hong Kong Jockey Club will be able to channel demand for betting on non-local horse races to the legal market.

I understand that the majority of the Hong Kong Jockey Club's simulcast customers are aged 40 or over and that customers aged 18 to 21 represent only .5% of the simulcast betting population, so with comprehensive responsible gambling measures in place, these proposals will not increase the risk of excessive betting and in fact will bring more betting into the regulated market.

I hope this is helpful and wish you well with your deliberations. We will be happy to address any questions or points of information which you may have on our submission.

Yours Sincerely,



Brian Kavanagh
Chief Executive Officer



實義點社會服務協會

香港添馬添美道 2 號
政府總部西翼 13 樓
博彩及獎券事務委員會
葉振都主席

葉主席：

支持香港賽馬會增加同步聯播賽事及 增加同步聯播日中的轉播非本地賽馬賽事場數上限

實義點社會服務協會有限公司（「本會」）現就香港賽馬會（「馬會」）增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次的建議表達意見，供 貴會參考。

本會成立於 2009 年，是根據稅務條例第 88 條獲豁免繳稅的公共性質慈善團體。本會以「團結青少年朋友，透過參與社區服務，貢獻青少年之力量，同創社區和諧」為宗旨服務社區。

作為一個關注青年發展的社區組織，本會高度關注非法賭博對青年及社會帶來的影響，現時非法外圍莊家在互聯網上提供各式各樣的投注產品，這些網站不但受任何監管，同時亦透過互聯網、電話訊息等宣傳滲透社區，鼓勵市民參與非法賭博活動，本會為此深感憂慮。

本會相信馬會作為本港唯一合法的博彩機構，在此問題上擔當著重要角色，是次馬會建議增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次，不但能回應馬迷對該類博彩方式的需求，亦能降低他們轉向外圍莊家下注的意欲，藉此打擊外



實義點社會服務協會

圍賭博活動。同時，馬會提倡有節制博彩，其措施包括不接受未成年人士的投注及不接受信用卡投注等，均有助避免因沉迷賭博而對個人以至社會帶來影響。

此外，馬會把賽馬收入除稅後的大部分收益用於支持地區服務，照顧香港不同階層需要。有賴馬會的支持，本會於今年年中舉辦「慶回歸 - 北區親子嘉年華同樂日」活動，活動藉表演項目及攤位遊戲推廣和諧共融社區，讓區內超過 500 名居民受惠。是次馬會的建議相信有助穩定其收入，對維持在社會上的慈善捐款極為重要。因此，本會支持馬會的建議，並希望當局持續打擊非法賭博，減少非法賭博對青年的影響。

順祝
工作愉快！



賴心

實義點社會服務協會有限公司主席

2023年8月8日

Hon. Presidents:
Dr. Eric K.C. Li, GBS, JP
Prof. S.P. Chow, SBS, JP

Chairman:
Prof. Frederick W.H. Ho, SBS

Vice-Chairmen:
Dr. Maggie M.K. Koong, BBS, JP
Mr. K.H. Woo

Hon. Secretary:
Ms. Connie Y.Y. Lai

Hon. Treasurer:
Mr. Colin S.Y. Wong

Directors:
Mr. Philip S.W. Chan
Mr. Raymond W.M. Chan
Ms. Sophia P.C. Chan
Mr. Michael W.K. Fan
Prof. Witman W.M. Hung, JP
Mr. Augustine T.S. Lee
Mr. Sunny S.Y. Leung
Prof. T.H. Tse
Mr. Jacob Hermit C.K. Yu

Hon. Legal Adviser:
Dr. Kennedy Y.H. Wong, BBS, JP

Executive Director:
Ms. Deborah W.Y. Wong

名譽會長：
李家祥博士
周肇平教授

主席：
何永煊教授

副主席：
孔美琪博士
胡勁恒先生

義務秘書：
黎月瑩女士

義務司庫：
王世揚先生

董事：
陳世榮律師
陳偉文先生
陳寶珠女士
范維綱先生
洪為民教授
李鐵榮先生
梁新兒先生
謝俊謙教授
余振球先生

義務法律顧問：
黃英豪博士

總幹事：
王詠兒女士

7th August 2023

Mr. Yip Chun To Adrian, BBS, MH, JP
Chairman
Betting and Lotteries Commission
13/F West Wing
Central Government offices
2 Tim Mei Avenue
Tamar, Hong Kong

Dear Mr. Yip,

Re: HKJC Simulcast Proposals

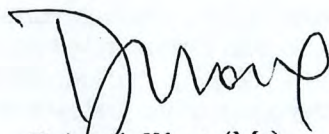
On behalf of the Association, I am writing to support The Hong Kong Jockey Club's proposal of increasing the maximum number of simulcast races per year and increasing the maximum number of non-local horse races per simulcast day.

The donation from The Hong Kong Jockey Club Charities Trust has been a key source of funding to the social welfare sector. Our Association is also one of the beneficiaries of its donation. Its donation effectively helps to fill important service gaps that the Government or other funding sources cannot fully cover, e.g. non-subsidized services, pilot service projects, etc. We believe that the increase in the number of simulcast races will lead to an increase in the business of The Hong Kong Jockey Club, which in turn will translate into more donation to the social welfare sector and tax revenue to the Government.

Your kind consideration of the proposal from The Hong Kong Jockey Club will be much appreciated.

Thank you for your attention.

Yours sincerely,



Deborah Wong (Ms)
Executive Director

DW/el



15 August 2023

Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman
Betting and Lotteries Commission
Home Affairs Bureau
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
TAMAR HONG KONG

Dear Mr Yip,

Re: Hong Kong Jockey Club's proposal to increase the maximum number of simulcast races per racing season and the maximum number of overseas races per simulcast day

I am writing to you in support of the Hong Kong Jockey Club's (HKJC) proposal to increase the maximum number of simulcast races per racing season and the maximum number of overseas races per simulcast day.

The Victoria Racing Club Ltd (VRC), based in Melbourne, Australia, is recognised in Australia and worldwide as a racing and event entertainment leader. The VRC is best known for hosting the Group 1 Lexus Melbourne Cup during the Spring Carnival, which attracts horses, jockeys, trainers and racegoers from around the world each year. It is the race that stops the nation and a globally telecast event.

The growth of international racing is extremely important to all jurisdictions, with its capacity to attract new fans and generate significant economic benefits. As the horse racing industry grows globally, it is essential that racing fans are able to enjoy high quality races held in other jurisdictions. While in Australia we have the advantage of being able to watch, and wager on, racing from other countries year-round, it is important for other jurisdictions, such as Hong Kong, to be able to do so as well. This will also help foster interest in international races and build the sport globally. This has been a key driver of our partnership and investment in World Horse Racing with our fellow partners, The Hong Kong Jockey Club, Ascot, Breeders Cup, Goodwood.

For example, the connections of ROMANTIC WARRIOR, which is currently the third highest rated racehorse in Hong Kong and the seventh highest rated racehorse in the Longines World's Best Racehorse Ranking (as of July 2023), have identified the Group 1 TAB Turnbull Stakes at the VRC's Flemington Racecourse as the first race of his overseas racing campaign in October 2023. However, it is worth noting that this race was not part of the overseas simulcast programme in Hong Kong last year, and it would be extremely

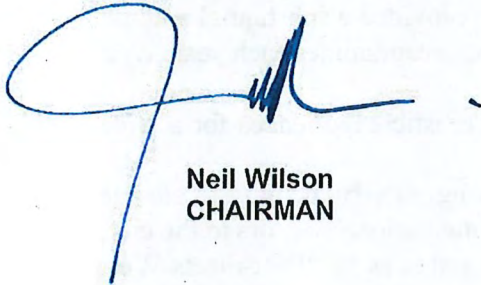
OFFICE OF THE CHAIRMAN

unfortunate if Hong Kong racing fans cannot watch one of their best racehorses participate in this year's race.

Simulcasting is a powerful tool for promoting horse racing by increasing the visibility and accessibility of the sport to fans and bettors. By allowing fans to watch and bet on the best races from different countries, simulcasting greatly assists the industry in promoting racing as a global sport.

Thank you for considering the VRC's submission in support of the HKJC's proposal regarding simulcasting arrangements.

Yours sincerely,

A handwritten signature in blue ink, consisting of a large loop on the left and a series of vertical strokes on the right, followed by a horizontal line.

Neil Wilson
CHAIRMAN

Attn: Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman
Betting and Lotteries Commission

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my Organization's comments are as follows:

The Hong Kong Jockey Club (HKJC), through its Charities Trust, has been a major supporter of the Hong Kong Arts Festival (HKAF) in the past five decades. It has provided a substantial amount of sponsorship/donations to the Festival through a number of significant programmes each year. With the support from HKJC, HKAF was able to:

- Enrich the cultural life of the city by providing quality artistic experiences for a wide cross-section of the public;
- Bring the world's best artists and ensembles to Hong Kong, thereby helping to elevate the status of Hong Kong as a cultural hub and attracting international visitors to the city;
- Encourage artistic dialogues and promote Hong Kong's status as an "East-meets-West Centre for International Cultural Exchange";
- Support local talents in new, original commissioned works in a variety of genres, including contemporary dance, chamber opera, music, theatre, musicals, and traditional Chinese opera;
- Promote Hong Kong students' interest in, and knowledge of, the arts via an extensive array of arts education programmes;
- Promote social inclusion through the arts in the community.

Below are a few examples of HKJC's support for the Festival:

One of the main focuses of the partnership between the Festival and HKJC is arts education, particularly providing quality arts education to young people in underserved communities. The Hong Kong Jockey Club Student Matinees project, for example, helps to broaden students' perspectives with in-school workshops and the opportunity to attend high quality Festival performances by some of the best international artistic ensembles in the city's theatres and concert halls. We believe this will contribute to their all-rounded development.

HKJC has also made long-term and consistent investment in the development of local talent in its partnership with HKAF, recognising that creativity is an important asset to the community. Long-term projects such as the Jockey Club Contemporary Dance Series, Jockey Club Local Creative Talents Series, and the Jockey Club InnoArts Series are not only beneficial to the participating artists, but also impactful to the entire arts sector as well as the community. These projects helped to open up opportunities for local talent in other parts of the world, and a good number of the artists featured have subsequently received invitations from international festivals and performance venues. The outreach and educational components of these projects further extend the impact and benefit to local students and youth.

HKAF and HKJC have also been co-presenting the special project, "No Limits", since 2019, which promotes inclusion and understanding through the arts. Through a series of performances and diverse outreach and educational programmes, "No Limits" strives to change the public's perception

of differently-abled members of the community, and to enable international and local artists of different abilities to showcase their talent on Hong Kong's stage. It creates an inclusive space for people of all types of abilities to share the joy of the arts together.

As a non-profit organisation that relies extremely heavily on sponsorship and donations, the HKAF would not have been able to present quality arts performances and activities for the Hong Kong community so extensively without the support from HKJC. Their support also enables HKAF to receive matched funds from the Government's Art Development Matching Grants Scheme in recent years.

Therefore, HKAF supports the Club's proposal to increase revenues by increasing the number of simulcast races. We believe that, by doing so, HKJC will be able to enhance support for charitable organizations in Hong Kong, and in turn contribute further to the betterment of our community.

Name : Flora Yu

Representing organisation (if applicable) : Hong Kong Arts Festival

Date : 15 August 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

As a non-subsided organization, we heavily rely on funding support and donation from different sponsors. We have been a beneficiary organization of Hong Kong Jockey Club Charities Trust since 2006, and the Trust's donation is a key source of funding for us to develop and implement various suicide prevention services.

The trust can offer funding support for capital and operation cost (including staff cost) which offer significant amount. Besides, the Trust's donation can fill the gaps that Government or other funding sources cannot fully cover which let us and other NGOs have resources to develop service to fill the service gap.

We believe that increasing simulcast races should lead to increase in business, which in turn will generate much more donation to social service organizations and more services can be provided, as a result, the community and the needy will be benefited.

Name : Vincent Ng

Representing organization (if applicable) : Suicide Prevention Services Limited

Date : 15 August 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.



Secretariat to the Betting and Lotteries Commission
13/F, West Wing, Central Government Offices,
2 Tim Mei Avenue,
Tamar, Hong Kong.
ha2@hyab.gov.hk

15th August 2023

Dear Sir,

I am writing on behalf of Horse Racing Ireland (HRI), the semi-state governing body with responsibility for horseracing in Ireland, in response to the request for submissions as part of a public consultation on the Hong Kong Jockey Club's proposal for additional horse race betting activities. HRI also owns and operates the sole Tote (Pari-Mutuel) permitted under law in Ireland.

HRI has had a long-standing and extremely positive relationship with the Hong Kong Jockey Club across all areas of international co-operation in relation to administration, promotion and regulation of the sport. Many horses which have been bred, trained and raced in Ireland have subsequently been sold to Hong Kong owners and enjoyed very successful racing careers in Hong Kong.

There are currently two Irish race fixtures covered by World Pool co-mingling, operated by the Hong Kong Jockey Club, the first at the Curragh on Irish Derby Day in July and the second at Leopardstown on Irish Champions Stakes Day in September. Both these meetings have been very successful in terms of generating international interest and turnover through their involvement as World Pool events.

HRI understands that the Hong Kong Jockey Club is now seeking permission to increase the number of simulcast races which may occur on the same day as a local Hong Kong race meeting, whilst also seeking to increase the maximum number of races which may be included on a simulcast day to allow greater flexibility. HRI strongly supports this proposal from the Hong Kong Jockey Club and believes it would be of significant benefit. It would enable a more comprehensive wagering menu to be offered and provide customers with a wider variety of races and betting pools. It will attract new customers and increase revenues for all the participating nations including Ireland and of course Hong Kong.



Increased simulcast reciprocity will help to build international relationships between racing nations and the racecourses involved, will further develop and grow promotional co-operation within the racing industry worldwide and will reduce costs through a wider sharing of the operating expenses involved with the production and distribution of live racing signals. With the increasing internationalisation of horse racing and wagering, it is vitally important that horseracing fans can watch and wager on races from different international venues through legalised channels rather than doing so via illegal and unregulated markets. Increasing the quota of races that can be broadcast by the Hong Kong Jockey Club is therefore vital in combatting the likelihood of the use of unregulated markets.

I hope this submission is beneficial and thank you for taking the time to consider it.

Yours sincerely

A handwritten signature in black ink that reads 'Jason Morris'.

Jason Morris

Director of Racing and Strategic Projects

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及(ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

香港青年協進會於1996年成立，是註冊的慈善機構。本會一直以「廣泛團結香港青年，培養人才，維護青年權益，發揮青年潛能，關心及參與社會事務，維持社會安定繁榮，促進香港社會民主健康發展，促進香港青年與內地海外青年交流」為宗旨，開展各項青年活動。

馬會一向不遺餘力地支持青年發展，多年來捐助多個包括「賽馬會鼓掌·創你程計劃」及「共創明『Teen』計劃」在內的大型項目。在社區層面上，馬會支持本會於本年初舉辦「城市定向短片創作比賽」，鼓勵參賽青少年了解中國歷史及中西藝術文化，提升他們的創意思維能力。

根據馬會提供的理據，有關建議預料不會增加年輕人過度博彩的風險，因為大部分參與同步聯播的投注者均為40歲或以上人士。另一方面，有關建議料可將非法賭博需求轉投合法投注渠道，並為政府庫房帶來額外穩定收入。本會支持馬會透過增加同步聯播以提高收益的同時，繼續積極投入公益事業，投放更多資源予青年工作，惠澤社群。

姓名

: 楊諾軒

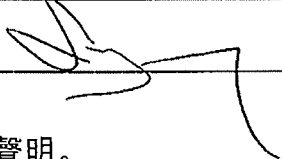
所屬機構（如適用）

: 香港青年協進會

日期

: 15/8/2023

簽署

: 

註：請細閱後頁個人資料收集聲明。

Dear Sir,

Re: Public view on the Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

I am writing this letter in support of the Hong Kong Jockey Club's submission to increase the currently approved allocation of simulcast races and simulcast race meetings commencing from the 2023/2024 racing season.

By way of background I was employed by the Hong Kong Jockey Club ('the Club') between 2002 and January 2023, primarily in the position of Chief Stipendiary Steward. I am currently a member of the Asian Racing Federation's 'Council on Anti-Illegal Betting & Related Financial Crime' as well as being the Chairman of the 'International Harmonisation of Racing Rules Committee' for the International Federation of Horseracing Authorities. It is in those capacities that I am writing this letter of support given what I believe to be the positive impact the granting of additional simulcast races and race meetings will have on the ever-increasing globalisation of horseracing as well as negating illegal betting.

By being amongst the world's leading providers of horseracing, the Club's functions perform an essential role in the betterment of Hong Kong society, primarily through its considerable financial contributions, whether it by way of betting taxes or charitable contributions. It is critical to the ongoing viability of Hong Kong's society that revenues derived from betting products offered by the Club, either locally or internationally, are properly derived through legal channels and not lost to illegal and unregulated bookmakers.

The level of financial and integrity concerns that illegal and unregulated betting provides, cannot be understated and the Club has an obligation to ensure it avails itself of all available means to prevent opportunities for illegal betting on horseracing to occur. A significant aspect of this ongoing duty is to provide betting on international racing events, so that interested persons are able to bet legally, which provides obvious benefits to Hong Kong. Were the Club not be able to provide betting on these events, then the betting public may turn to illegal and unregulated betting providers in order to wager on the events which diverts betting revenues away from the Hong Kong Government.

It is my considered opinion that increasing the current number of simulcast races and simulcast race meetings will provide the Club with an effective measure to negate the influence and attractiveness of illegal betting in Hong Kong. I therefore hope that the Betting and Lotteries Commission will give favourable consideration to the Club's submission.

Please do not hesitate to contact me should you require anything further from me in respect of this matter.

Yours sincerely,

Kim Kelly

Member, Council on Anti-Illegal Betting & Related Financial Crime

Asian Racing Federation

Chairman, International Harmonisation of Racing Rules Committee

International Federation of Horseracing Authorities

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

Mother's Choice and the Hong Kong Jockey Club (HKJC) share an extraordinary and enduring friendship. When we first opened our doors in 1987, HKJC stood by us as one of our earliest supporters, believing in our mission when others hesitated. Their unwavering generosity and encouragement have been instrumental in our success over the years. We owe a profound debt of gratitude to HKJC, as without their funding, crucial programs like our Pregnant Girls Services would never have been able to touch the lives of thousands of crisis pregnancies. In 2023, NGOs face unprecedented challenges, with corporate and foundation donations shrinking due to the prevailing economic climate and tightened budgets. This unfortunate circumstance has had a direct impact on organizations like Mother's Choice, which heavily rely on such contributions from corporates and private entities.

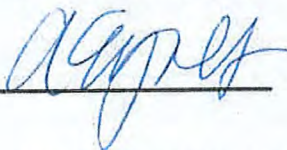
To fulfill our commitments and expand our programs, particularly in light of the escalating child protection crisis and the growing number of children without families and pregnant teenagers in Hong Kong, we urgently require additional funding. We firmly believe that our efforts to ensure every child grows up in a secure, nurturing, and permanent family will shape a better future for generations to come. It is in this context that we see the HKJC's proposal as a beacon of hope—a solution that can bolster the financial resources of their Charities Trust and provide crucial support to Mother's Choice and other NGOs striving to meet their budgetary requirements. By embracing this proposal, we can move closer to our financial goals and continue making a profound impact on our community. Together, we can transform Hong Kong into a more compassionate and inclusive society.

Name : Alia Eyres

Representing organisation (if applicable) : Mother's Choice

Date : 17/08/2023

Signature

: 

Note: Please read the Personal Data Collection Statement on the next page.

Secretariat to the Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

Sent via email - ha2@hyab.gov.hk

16th August 2023

Dear Sirs

The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

We refer to The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities, dated 28th July 2023.

Britbet is a formal partnership owned by 55 British racecourses. We provide the oncourse pool betting function at those racecourses, taking bets from customers oncourse at our partner racecourses. We also have a commercial agreement with the UK Tote Group regarding the commingling of our racegoer generated liquidity into the pools hosted by the UK Tote Group. On World Pool days at our partner racecourses we also deliver liquidity from racegoers into the pools hosted by the Hong Kong Jockey Club. The interaction between our racecourse partners and the Hong Kong Jockey Club is a valued exchange, delivering mutual benefits for our customers, the racecourses and the wider racing community.

We fully support this proposal and agree with the assumptions outlined within the document. In particular, we would like to highlight the following positive benefits of broad co-operation between our racecourses and the Hong Kong Jockey Club, something that the proposals will expand upon:

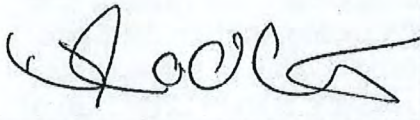
1. Simulcast reciprocity is a system that allows horse racing operators to share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations via legalised wagering channels. Our customers are familiar with racing across multiple jurisdictions and the increasing globalization of racing is a key attraction to them. This is likely to be mirrored in other jurisdictions, with customers wishing to watch and wager on the best racing provided across the world. Enabling this via legal routes is beneficial to the regulated operators, the sport and the customers.
 2. Providing simulcast reciprocity allows operators to offer a more comprehensive wagering menu to their customers. Their customers are then able to access a wider variety of races and legal betting pools. This helps to showcase the sport to new customers, future proofing the sport whilst diversifying the product for existing customers. Customers want to bet on these races and allowing such bets to be made via legalized wagering channels is the safest mechanic for them and for the sport.
-

3. Our racecourse partners very much value the simulcast link they have with the Hong Kong Jockey Club and the engagement it facilitates on each others racing – with Hong Kong racing being viewed and bet on here in the UK, and selected GB racing being enjoyed as part of the World Pool arrangements by racing fans in Hong Kong and beyond. These reciprocal simulcast arrangements are at the forefront of the strong relationship between our partner racecourses and the Hong Kong Jockey Club. They also assist in broader co-operation across the racing industries in our jurisdictions, sharing learnings and improving the sport for the benefit of our customers and participants.
4. The reciprocal arrangements also deliver efficiencies, by helping to reduce the costs associated with producing and broadcasting live racing signals, enabling operators to share the costs of production and distribution.

We believe the proposal by the Hong Kong Jockey Club will deliver further benefits for the racing industries in our respective jurisdictions. It will also enhance the product for our respective customers, delivering prominent races and ready access to a legalised betting route, and we support the proposal.

We would be happy to engage further should that be required.

Yours sincerely,



NIGEL RODDIS
Managing Director



17 August 2023

The Secretariat to the Betting and Lotteries Commission
13/F West Wing Central Government Offices
2 Tim Mei Avenue
Tamar Hong Kong

By email: ha2@hyab.gov.hk

Dear Secretariat

Letter of Support - HKJC Proposal to increase the number of Simulcast Races per year

I write in support of the Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities – specifically to:

- (i) increase the maximum number of simulcast races per year from 10 to 25; and
 - (ii) increase the maximum number of non-local races per one simulcast day from nine to 12;
- starting from racing season 2023/24.

By way of background, Racing NSW is the regulator and commercial body for thoroughbred racing in the State of NSW, Australia. The NSW and Hong Kong thoroughbred racing industries have a lengthy and mutually beneficial working relationship. For example, industry participants such as Hong Kong's leading jockey, Zac Purton, and leading trainer, John Size, originally made their names in NSW racing. Further, Mr Marc Van Gestel, the current Chairman of Stewards of the Hong Kong Jockey Club spent his previous 33 years working as a Steward in NSW and Racing NSW's current Chairman of Stewards, Steve Railton, was for many years Deputy Chairman of Stewards in Hong Kong. Both NSW and Hong Kong pride themselves on promoting thoroughbred racing in our respective countries, within Asia and globally.

In regard to the HKJC proposal, the Simulcast reciprocity system allows horse racing operators to share their live racing signals with each other, enabling racing fans in participating jurisdictions to enjoy and wager on races from different locations via legalised wagering channels.

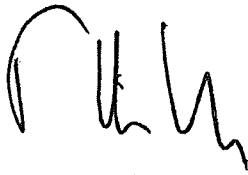
Simulcasting allows operators to offer an expanded wagering menu to their customers and wagering customers are able to access a wider variety of races and betting pools. It also presents an opportunity for horse racing operators to increase their revenue by attracting new customers.

Further, it can help to build relationships between operators and foster cooperation within the racing industry, allowing a reduction in the costs associated with producing and broadcasting live racing signals by sharing the costs of production and distribution.

Importantly, the recent innovation of the World Pool by merging the totalizator pools of the HKJC into other racing jurisdictions will benefit greatly from the increased simulcast proposal. The advent of the World Pool by the HKJC is a game-changing initiative. The co-mingling arrangements create bigger pools, providing improved returns to operators and wagering customers. Allowing more simulcast races into the program will elevate the benefits of the World Pool to reach maximum potential.

Racing NSW strongly supports this initiative by the HKJC and would be pleased to provide further information if it assists the Secretariat.

Yours faithfully
RACING NSW

A handwritten signature in black ink, appearing to read 'P V'LANDYS AM', written in a cursive style.

P V'LANDYS AM
CHIEF EXECUTIVE

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

We support the Hong Kong Jockey Club's (HKJC) proposal to increase the maximum number of simulcast races and non-local races.

Over the years, the HKJC has been donating generously to the community through its Charities Trust. They invested significantly in social causes such as education, healthcare, and community development, and contributes tremendously to the betterment of our society. We believe that with the increase in income and surplus through the increase of simulcast races and non-local races, the HKJC and its Charities Trust will be able to further their devotion to charitable causes and continue to make a positive impact on our community.


In addition, we believe that the increased number of races will channel betting demand to the legal channel and hence help tackling illegal betting and promote a healthy and sustainable horse racing industry, that can continue to contribute to social betterment.

Name : Prof. Alex Wai

Representing organisation (if applicable) : Hong Kong Baptist University

Date : 15 August 2023

Signature

: Alexander Wai 

Note: Please read the Personal Data Collection Statement on the next page.



17 August 2023

Secretariat of the Betting and Lotteries Commission
13/F, West Wing Central Government Offices
2 Tim Mei Avenue
Tamar,
Hong Kong

By email: haz@hyab.gov.hk

Dear Secretariat of the Betting and Lotteries Commission,

The relationship between New Zealand Thoroughbred Racing (NZTR) and The Hong Kong Jockey Club (HKJC) is one of profound significance within the global horse racing community. With a shared passion for breeding and racing exceptional Thoroughbreds, both entities collaborate closely in various facets of the industry. New Zealand's reputation as a fertile ground for breeding high-quality racehorses complements The Hong Kong Jockey Club's pursuit of top-tier equine talent for their prestigious race meets. Through the exchange of horses, expertise, and knowledge, this relationship embodies a symbiotic partnership that elevates the standard of racing excellence on both sides, fostering a connection that enriches the sport's international landscape.

In that respect, NZTR wishes to convey its full support for the proposal put forward by HKJC for additional horse race betting activities, specifically seeking to increase the number of simulcast opportunities.

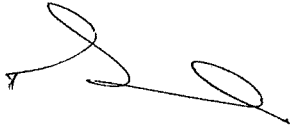
Simulcast reciprocity is a globally significant system that allows horse racing operators to share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations via legalised wagering channels.

Importantly, it allows operators to offer a more comprehensive wagering menu to their customers, enabling access to a wider variety of races and betting pools and providing a way for horse racing operators to increase their revenue by attracting new customers.

Simulcast reciprocity agreements can offer several benefits to operators. It can help to build relationships between tracks and foster cooperation within the racing industry and reduce the costs associated with producing and broadcasting live racing signals, as operators can share the costs of production and distribution.

NZTR has an unwavering belief that approval of the proposal being sought by HKJC would have an immense and prosperous impact.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Sharrock', with a long horizontal stroke extending to the right.

Bruce Sharrock
Chief Executive

To: [HA2/HYAB](#)
Subject: 回應香港賽馬會增加賽馬博彩活動的建議
Date: 2023年8月17日 22:27:09

致：博彩及獎券事務委員會秘書處
電郵：ha2@hyab.gov.hk
日期：2023年8月17日
由：龍緯汶文化藝術國際交流協會
關於：回應香港賽馬會增加賽馬博彩活動的建議

敬啟者：
龍緯汶文化藝術國際交流協會於2007年成立，努力服務香港市民

為了阻止賭風漫延，我們反對每年的同步聯播賽事場數上限由目前的10場增加至25場

我們亦反對每個同步聯播日轉播非本地賽馬賽事場數上限，由目前9場增至12場

專函奉達，佇候示覆 如需進一步資料，請聯絡本人

龍緯汶（主席）謹上

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

The Korea Racing Authority (KRA) is the sole horse racing authority in Korea and is a member of the Asian Racing Federation, a regional federation comprising national and racing-related organizations from across Asia, Oceania and Africa. On behalf of the KRA, I would like to outline my support for the above proposals by the Hong Kong Jockey Club.

Simulcast is a system that allows horse racing operators to share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations via legalized wagering channels.

Through simulcasting, operators are able to offer more comprehensive wagering content to their customers who in turn gain legal access to a wider variety of races.

This can bring several benefits. It can help to build relationships between jurisdictions and foster cooperation within the racing industry. Crucially it can help to combat illegal betting by redirecting betting demand to legal channels.

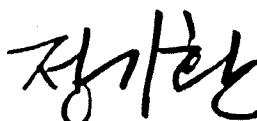
The approval of these proposals will allow the Hong Kong Jockey Club to further its position as a world leader in its product offering and in responsible wagering.

Name : CHUNG KI-HWAN (Chairman & CEO)

Representing organisation (if applicable) : Korea Racing Authority

Date : 13th August, 2023

Signature :



Note: Please read the Personal Data Collection Statement on the next page.

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把 i) 每年同步聯播賽事由 10 場增加至 25 場；及 ii) 每個同步聯播日的非本地賽事場數上限由 9 場增至 12 場，本機構意見如下：

首先，我代表香港聖公會福利協會感謝您向我們徵詢意見。

作為一個具基督教信仰的非政府組織，我們非常重視社會福利和道德責任的問題。在此背景下，我們必須謹慎處理與博彩相關的問題，亦須關注個人和社會的健康和福祉。我們了解賭博所帶來的負面影響，包括賭博成癮和家庭破裂等問題。

我們明白和欣賞香港賽馬會透過慈善信託基金為香港社會無論在社會服務、教育、體育運動和其他方面所作出的重大貢獻，並且理解馬會提出的建議。協會認同馬會的建議有助於打擊非法投注和增加政府的稅收和慈善貢獻。

基於以上的考慮，我們建議採取以下措施以平衡不同利益：

加強賭博預防教育：加強對公眾的教育，提高他們對賭博問題的認識和潛在風險的理解，幫助個人做出明智的選擇。

加強賭博輔導：加強賭博輔導服務，以確保對賭博問題有相應的支持和治療。這將有助於保護那些可能受到博彩活動負面影響的個人和家庭。

檢視對青少年影響：制定措施定期檢視聯播是否增長青少年賭博比率，確保青少年不受負面影響。

總括而言，我們支持打擊非法活動，但賭博帶來的風險也不容忽視。馬會若能顧及不同因素，我們相信建議將更易獲得公眾支持。作為馬會的長期夥伴，我們願意與馬會共同應對賭博問題，保護弱勢群體的福祉，並提供必要的支持和援助。

(本協會不欲向傳媒或公眾公開意見，請予以保密)

姓名：黃珮琳 - 企業傳訊及市場營銷總監

所屬機構：香港聖公會福利協會有限公司

日期：二零二三年八月十七日

簽署：

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

The Hong Kong Philharmonic Society Ltd. strongly supports the HKJC's proposal to increase the number of simulcast races and the maximum number of non-local races per simulcast day.

We are not in a position to comment on the potential impact on young people of increasing the volume of betting opportunities on racing. But we understand that the percentage of young bettors is quite low anyway, the negative impact is probably unlikely to be significant.

But we do see the positive impact of such an improvement on the status of the HKJC as a major player in the World Pool and the international racing circus and we understand that it will give more incentives for players to stay with the legal platforms. The expected increase in revenue will, of course, have a positive impact on HKJC's financial contributions to the HKSAR Government's budget - and on the donations that HKJC can make to social and cultural projects.

Apart from the HKSAR Government, the HKJC is by far the most powerful donor to cultural NGOs such as HK Phil, which rely heavily on funding from institutional and private foundations, trusts and patrons. Without this funding, which for us is about 22% of our annual budget, we wouldn't be able to carry out many of our educational and community projects, including free school and community concerts, school visits by our ensembles, discounted student concert tickets, online music content, etc.

We are convinced that many other cultural NGOs, as well as the social institutions that serve the underprivileged of all generations, in environmental protection or in the health sector, will support the HKJC's request - because our organisations will benefit from the increased benefits. Yes, we support HKJC's proposal for additional horse race betting activities.

Name : Benedikt Fohr

Representing organisation (if applicable) : Hong Kong Philharmonic Society Ltd.

Date : 18 Aug 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.



Deutscher Galopp e.V.

Secretariat to the Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar

Deutscher Galopp e.V.

By email ha2@hyab.gov.hk

18.08.2023

The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

Dear Madam/Sir,

I am writing to you as Chairman of Deutscher Galopp e.V. We are the umbrella organisation representing all German thoroughbred breeders, owners and racecourses.

German owners and breeders as well as racing fans and bettors have an increasing international perspective, a trend seen in all major racing countries. The Hong Kong Jockey Club has been a highly respected partner to racing authorities all over the world for many years. In addition, the HKJC leads globally on many important wagering and regulatory issues, such as the World Pool.

In the current calendar year, only six races will be simulcasted to Hong Kong. We would very much like to see this number increase and bring more of our top-class racing to Hong Kong, for a number of reasons:

- this would respond to the growing demand of fans and bettors in all countries to closely follow the top horses and jockey around the globe, similar to football or Formula 1
- it would bring additional economic benefits both to the sport of racing and to revenue authorities in all nations concerned
- it would concentrate wagering on regulated and legal channel which we consider a very important aspect for the integrity of racing and the mitigation of social problems

We would be delighted to learn of your positive response to this application and remain at your disposal for any questions you may have.

Yours sincerely

Dr. Michael Vesper
Chairman
Deutscher Galopp e.V.

Vorstand: Dr. Michael Vesper (Präsident), Gregor Baum (Vizepräsident), Gerhard Schöningh (Vizepräsident), Lars-Wilhelm Baumgarten,
Dr. Alexander Bethke-Jaenicke, Eckhard Sauren, Christian von der Recke, Nastasja Volz-Degel
Ehrenpräsident: Dipl.-Ing. Albrecht Woeste
Geschäftsführer: Daniel Krüger



*13/F, West Wing
Central Government Offices
2 Tim Mei Avenue,
Tamar,
Hong Kong*

*Attention: Secretariat to the Betting and Lotteries Commission
Fax No.: 2591 600
E-mail: ha2@hyab.gov.hk*

Dear Sir / Madam

The Jockey Club operates 15 racecourses in the UK, manages 5,000 acres of land primarily used for training racehorses, runs The National Stud, a breeding and horseracing education centre, and manages Racing Welfare, a charity supporting the workforce of British horseracing and their dependents.

Jockey Club Racecourses run around 340 fixtures each year, hosting 14 of the 36 Group 1 flat races in the UK across 12 race days, including four of the five 'classics', the 2,000 and 1,000 Guineas, the Oaks and the Derby. Five of the World's Top 100 Group 1 Races for 3yos and upwards are hosted by Jockey Club Racecourses.

The Jockey Club's mission is to act for the long term good of British horseracing in everything we do and the vision is to create a thriving horseracing industry for all. Under its Royal Charter, The Jockey Club has no shareholders and does not pay dividends, re-investing all its profits back into the horseracing industry.

The Jockey Club has worked collaboratively and positively with the Hong Kong Jockey Club over many years, welcoming their representatives to our racecourses as we are similarly welcomed warmly in Hong Kong, most recently at FWD International Day in April 2023. In recent times, we were delighted to make our 2,000 Guineas Day at Newmarket and Oaks Day and Derby Day at Epsom Downs World Pool events in 2021 and 2022. In 2023, The Jockey Club was also proud to continue the World Pool partnership for 2,000 Guineas Day and Derby Day.

It has been a pleasure to work with the Hong Kong Jockey Club, the UK Tote and our media rights partner, Racecourse Media Group, to ensure we maximise the

1750 ♦ ONWARDS



opportunity offered by World Pool, truly a trailblazing initiative of which the Hong Kong Jockey Club should be very proud. It is a key driver in putting Hong Kong in a very prominent position on the international horseracing map where it belongs. It also helps to internationalise our sport and boost revenues to reinvest back into racing.

World Pool has displayed that the Hong Kong Jockey Club is a leader in the global horse racing industry. The Jockey Club understands and strongly supports the industry and financial benefits that World Pool commingling can create for horse racing in Hong Kong, the United Kingdom and around the world.

The reciprocal financial benefits that World Pool creates has a notable effect on the racing industry in both Hong Kong and the United Kingdom. It allows for increased investment into prize money which filters down to all racing participants. The current economic challenges being faced around the world are also being felt within the racing industry; therefore, avenues which increase revenue and prize money are extremely important. The additional revenue and prize money also has a positive effect on the bloodstock industry which helps futureproof the horse racing industry in the United Kingdom and also in Hong Kong. The benefits of World Pool will also be realised by participants who work for racing stables and are employed in the wider racing industry. This also assists in the sustainability and health of the industry globally into the future.

World Pool also benefits the racing fan around the world. Not only is the betting population able to bet into highly liquid markets, the commingling and simulcast also means fans are more frequently engaging with feature races in other jurisdictions globally. Horse racing has globalised significantly in the past decade and the World Pool initiative allows fans to wager on horses and jockeys internationally through legal betting channels.

It is with all this in mind that we would like to express our strong support for the Hong Kong Jockey Club's application to expand simulcast opportunities in Hong Kong. Specifically, to increase the number of international simulcast races taking place on the same day as local Hong Kong racing from 10 to 25 in a season and which may be run before, during or after the Hong Kong meeting. Further, to increase the maximum number of races which on an international simulcast day from 9 to 12.

1750 • ONWARDS



The Jockey Club thanks the HKSAR Government and the Hong Kong Jockey Club for the World Pool partnership to date and looks forward to the above proposals being approved to make World Pool and Hong Kong's position in international horseracing even stronger in future.

Kind regards,

A handwritten signature in black ink that reads 'Nevin Truesdale'.

Nevin Truesdale
Chief Executive Officer

11th August 2023

1750 • ONWARDS



香港青年聯會
HONG KONG UNITED YOUTH ASSOCIATION LIMITED

有關「香港賽馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次」之意見

香港賽馬會建議增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次，香港青年聯會對此表示支持。

香港賽馬會是香港主要的慈善機構，對社會發展作出重大的貢獻。馬會能夠回饋社會，有賴其獨特的綜合營運模式，透過賽馬及博彩業務所得收益，為社會帶來稅收及慈善捐款。香港賽馬會慈善信託基金資助多項針對香港弱勢社群、青少年及長者等的創新項目，以配合政府促進社會和諧的工作，為香港社會帶來莫大的益處。

香港青年聯會成立於1992年8月4日，主要以中華全國青年聯合會及各省市青聯的港區特邀委員為核心，由本港各界青年才俊、青年團體領袖及學界精英組成。自成立以來，憑著各會員卓越的執行能力及在政府部門及各義務組織的支持，每年均舉辦不同的大型活動，為香港青年人提供擴闊視野、自我提升的機遇，也為社會培養出一批又一批關心祖國、熱愛香港、敬業樂群的青年精英和精幹的義工隊伍。

香港賽馬會是香港青年聯會不可多得的合作夥伴，一直為本會重點的青年項目—「實踐科創·探知歷史」2023至2026實習與交流計劃持續提供資助。馬會的慷慨捐助令本會得以擴展我們的服務，如上述的實習及交流計劃讓更多香港學子感受中國式現代化進程，培養家國情懷以促進青少年發展。

非法賭博亦會令政府稅收及馬會的慈善捐款流失。馬會一直全力協助打擊非法賭博，並提高大眾對非法賭博問題的意識。香港賽馬會一直致力打擊非法賭博，並提高人們對問題的認識，特別是對青少年賭博和病態賭博的問題。為預防未成年人士參與賭博，馬會作為一個負責任的博彩服務營運者，一直致力提倡有節制博彩。

本會感謝委員會對青少年賭博的問題表示關注。我們相信提供合法渠道讓市民投注更多同步聯播賽事有助打擊非法賭博，亦可為政府帶來額外稅收，並預計對青少年的影響。因此，本會對馬會的建議表示支持。

香港青年聯會希望博彩及獎券事務委員會可以接納香港賽馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次的申請。



主席

楊政龍



副主席兼政策及培訓委員會總監

柯家洋

香港青年聯會

2023年8月18日



Secretariat to the Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tarnar Hong Kong

By email ha2@hyab.gov.hk

Iffezheim, 18.08.2023

The Hong Kong Jockey Club's Proposals of Additional Horse Race Setting Activities

Dear Madam/Sir,

Baden-Baden racecourse is proud to have been one of the first German racecourses to simulcast races to Hong Kong. On September 4th 2022 we broadcasted 3 races, including the prestigious Group 1 Baden-Baden Grand Prix. This will be repeated on September 3rd 2023, when bets on the same three races will be commingled in the World Pool under Hong Kong Jockey Club leadership.

We wholeheartedly support the Hong Kong Jockey Club's application for an increase in the number of simulcast races on local HK race days from 10 to 25 and for an increase in the number of simulcast races on simulcast days from 9 to 12, for the following reasons:

As all major sports, horse racing is becoming more international every year. Racing fans everywhere have an increased interest in following top horses from their country competing in other countries, as well as generally following the top horses and races in other countries. This enhanced international interest is borne out by the great success of the Hong Kong International Races. An increase in the number of simulcast races will satisfy a real demand and allows racing fans to better follow the sport they love and to make better informed wagering decisions.



The Hong Kong Jockey Club only forms simulcasting agreements on a reciprocal basis with legalised wagering operators recognised by their national racing authority. This has a number of important benefits:

- These wagering operators are legalised and comply to high standards of customer care, addiction prevention, youth protection and compliance thus mitigating the risk of social and personal problems as well as criminal activity.
- In addition, legalised and recognised wagering operators contribute to the improvement of the race program, equine welfare and integrity thus strengthening the health and sustainability of racing and wagering in their jurisdictions. When wagering takes place with unregulated or illegal operators, it is very likely that racing does not benefit at all or does not receive its fair share.
- We have been able to significantly improve the quality of our live TV production and broadcast. This would not have been viable with a national German pool alone. Simulcasting into an international pool with Hong Kong participation allows for a very high-quality production with production costs shared by many countries.

In summary, from an international perspective, an increased number of simulcast races will bring substantial benefits to customers as well as the sport of racing. It will also bring social benefits by reducing the amount of wagering activity in illegal or unregulated channels. We support this application without reservations.

Yours faithfully

Stephan Buchner

Managing Shareholder
Baden Galopp GmbH & Co. KG

Secretariat to the Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong.

By email ha2@hyab.gov.hk

Munich, 18 August 2023

Dear Madam/Sir,

The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

we are writing to you as Chairman and CEO of BGG mbH. BGG ist the German Racecourse Association representing the interests of all German racecourses.

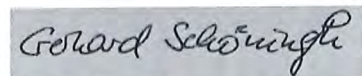
We strongly support the Hong Kong Jockey Club's application for an increase in the number of simulcast races. At the moment, the number of simulcast races in Hong Kong is extremely limited compared to the offering in nearly all other racing nations. This cuts off Hong Kong fans and bettors from enjoying top class races from all over the world, including some in which horses from HK compete.

It is our experience that this drives wagering into unregulated or even illegal channels, with many negative consequences. Racing suffers a loss of income, and these operators often pay less or no regards to the social consequences of excessive gambling.

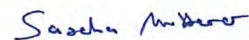
We believe that the HK fan experience as well as the economic benefits to racing and governments both in Hong Kong and in the jurisdictions of the commingling partners will be much improved. Possible harmful social consequences will be better controlled by offering a well-regulated and legalised channel such as the HKJC.

For this reason, we are in full support of the application.

Yours sincerely



Gerhard Schoeningh
Chairman



Sascha Multerer
CEO



Secretariat to the Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

By email ha2@hyab.gov.hk

Background of Auckland Thoroughbred Racing Inc. (Ellerslie).

We have had a long and fruitful relationship with the Hong Kong Jockey Club (HKJC). Not only have we had a strong business relationship, but there have also been times when HKJC jockeys have ridden at Ellerslie. To name a few; Olivier Doleuze rode Zabeat to second in the Auckland Cup in 2006, Zac Purton rode Corporal Jones to second in the 2010 NZ Derby and Douglas Whyte has also ridden a winner on Derby Day.

Pre Covid restrictions, we had HKJC track team members come over for a one week visit to work with our track team, something that we would like to start again since restrictions on travel have been removed.

To give context to the quest of the HKJC taking more simulcast races, the last two years of coverage simulcast by the HKJC there was total turnover for one race (The NZ Derby) of:

2022 Turnover - \$5,140,047 (NZD)

2023 Turnover - \$6,350,479 (NZD)

With our track out of action, undergoing a major reconstruction (with the installation of a StrathAyr surface), this will allow for even more confidence from the HKJC betting members and public in taking more races from Ellerslie.

This affords the HKJC to allow their betting public to place bets, under their control, without those people being able to place bets through other illegal means. Thus, the Club can receive commission and therefore grow their share.

Our support is specifically aligned to the below. We support the Hong Kong Jockey Club in their quest to:

- Increase the number of simulcast races (on the same day as their local HK meeting) from 10 to 25 in a season, of which they may occur before, during or after their meeting.
- To also increase the number of maximum races on a simulcast day (which they are allowed 37 in one season) from 9 to 12 for greater flexibility to take a full card and / or more multi days.

- Simulcast reciprocity is a system that allows horse racing operators to share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations via legalised wagering channels.
- It allows operators to offer a more comprehensive wagering menu to their customers and wagering customers are able to access a wider variety of races and betting pools, and it also provides a way for horse racing operators to increase their revenue by attracting new customers.
- Simulcast reciprocity agreements can benefit operators in several ways. It can help to build relationships between tracks and foster cooperation within the racing industry, and to reduce the costs associated with producing and broadcasting live racing signals, as operators can share the costs of production and distribution.

Kind regards,

A handwritten signature in cursive script, appearing to read 'Paul'.

Paul Wilcox
Chief Executive
Auckland Thoroughbred Racing



Mr Yip Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman - Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

21 August 2023

Dear Mr Yip,

The Hong Kong Jockey Club Charities Trust (HKJCCT) has been one of Food Angel's key sponsors since 2013. Throughout the years, we have received donation from the HKJCCT for our Food Rescue and Food Assistance programme. This programme is crucial in supporting our production of nutritious meals for free distribution to underprivileged elderly and families in Hong Kong.

HKJCCT's unwavering support has enabled us to turn over 7,000 tons of rescued food into over 5 million meals and 700,000 food packs for serving those in need. In addition, HKJCCT has supported Food Angel to launch various assistance programmes to help address the community needs during the pandemic. Together, we have developed and deployed the first automatic food dispenser in the social service field in an innovative manner to relieve the financial burden of those who have been affected by COVID-19. Over 2 million meals have been served via these automated food dispensers.

We would like to express our heartfelt gratitude for HKJCCT's support over the years, offering essential and timely funding for fulfilling our mission of "Waste Not · Hunger Not · With Love".

Yours sincerely,

Gigi Tung
Founder of Food Angel



To: [HA2/HYAB](#)
Subject: HKJC Submission
Date: 2023年8月21日 13:43:08
Attachments: [image002.png](#)

To: Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P., Chairman, Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong
(Attention: Secretariat to the Betting and Lotteries Commission)

Submission on The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

Dear Mr YIP,

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows;

I submit these comments both as the CEO of a National Sports Association that is heavily focused on working with young people in our community, as a recipient of HKJC financial support, and also as a previous Hong Kong police officer with some knowledge of illegal gambling activity in our city.

I firmly support the HKJC's belief that the proposed additional activities will help make legal betting more attractive by increasing choice and thereby to some small degree stemming the flow of cash to illegal betting and organised crime, and all the detrimental impact that has across society.

I also appreciate that there is a direct correlation between the level of revenue for the HKJC and the amount of funding they are able to invest back across the community through all their support for charities and NGOs like ourselves – just in terms of our own sport-for-development programmes there are thousands of boys and girls from the marginalised sectors of our city who have benefitted from HKJC funding.

Finally, having worked in organisations with a youth focus for more than 30 years I am confident that the proposed additional activities will have a minimal impact on the behaviour of youth.

Name : Robbie McRobbie

Representing organisation (if applicable) : Hong Kong China Rugby

Date : 21/8/23

Signature :  _____

Robbie McRobbie | CEO | Hong Kong China Rugby





21 August 2023

會長
President

孫騰章
Brian Sun

副會長
Vice Presidents

陳湛文
Simon C.M. Chan
會員事務委員會
Membership Committee

馬博文
Josiah P.M. Ma
賽事委員會
Racing Committee

鄧偉業
Leslie W.Y. Tang
康樂活動委員會
Social Committee

楊存洲
Thomas C.C. Yeung
慈善委員會
Charity Committee

義務秘書(行政事務)
Hon Secretary-Admin.

鞠祿龍
Lawrence L.L. Kook

義務秘書(賽馬事務)
Hon Secretary-Racing

羅揚駿
Ronald Y.C. Lo

義務司庫
Hon Treasurer

王經緯
Kirk K.W. Wong
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費志恩
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Patrick H.C. Kwok

蕭煒忠
Danny W.C. Siu

曾向得
Raymond H.T. Tsang

王文揚
Ryan M.Y. Wong

王賢訊
Vincent Y.S. Wong

Mr YIP Chun-to, Adrian BBS MH JP
Chairman
Betting and Lotteries Commission
Home Affairs Bureau
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

Dear Mr Yip

The Hong Kong Jockey Club's proposal to increase the maximum number of simulcast races per racing season and increase the maximum number of overseas races per simulcast day

I am writing on behalf of The Hong Kong Racehorse Owners Association ("HKROA") to express our strong support for The Hong Kong Jockey Club's ("HKJC") proposal to increase the maximum number of simulcast races per racing season and the maximum number of overseas races per simulcast day.

As a key stakeholder in Hong Kong racing, we would like to offer our perspectives for your thoughtful consideration.

Established in 1978, the HKROA serves as the formal body representing racehorse owners in Hong Kong. Our primary goals revolve around fostering the well-being of our members and promoting horse ownership within the framework of the HKJC's Rules of Racing. Our Association provides a platform for owners to address and discuss issues concerning horse ownership in Hong Kong, as well as those of mutual interest with the HKJC.

Hong Kong racing enjoys a distinguished reputation globally, and the HKJC's world-class operations, unwavering commitment to integrity, and dedication to the betterment of our society have been key drivers of this success. Hong Kong owners invest significantly to source highest quality racehorses from around the world. As a result, the horse population in Hong Kong is of exceptional class and our races are competitive, and of immense interest to local and international fans. As of July 2023, 4 of the top 10 racehorses in the Longines World's Best Racehorse Ranking come from Hong Kong.

With racing being an international sport, Hong Kong owners not only have a chance to enjoy winning local races, but also the opportunity to compete against the world's best and experience glorious moments by participating prestigious races overseas.



We therefore believe that increase in simulcasting races is important to horse owners in several ways:

1. By granting Hong Kong fans legal access to simulcasts of top races, we open up numerous opportunities for fan engagement and enjoyment. As owners, we are eager to watch and wager on these big international races, including those featuring our Hong Kong-based horses, owners, trainers and jockeys. It therefore provides extra incentives for Hong Kong owners to continue investing in high-quality racehorses and sending them to race overseas. This is a core element to supporting and strengthening the quality of the racing product in Hong Kong;
2. At the same time, simulcasting can help to increase the visibility and marketability of young horses which run overseas and facilitate potential buyers and future owners in purchasing the right horses to run in Hong Kong;
3. It is very important to reward and encourage Hong Kong owners to maintain a high level of racehorse ownership interest, as well as to ensure our elite races are attractive to world-class overseas competitors. As a result, additional revenue streams created by the increase in simulcasting will help support the HKJC's prizemoney strategy, which has been critical to maintaining Hong Kong's racing quality as one of the best in the world.

We truly believe that the HKJC's simulcast proposal will lead to significant benefits for horse owners and the industry at large, and we fully support it. We respectfully request that the Commission considers the HKROA's views in its deliberations.

Thank you for your consideration.

Yours sincerely

Brian Sun
President
The Hong Kong Racehorse Owners Association



4 RACING (PTY) LTD

August 16, 2023

Secretariat
Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong.
(Sent via email to ha2@hyab.gov.hk)

SUBJECT:

Proposals of Increasing the Maximum Number of Simulcast Races per year and Increasing the Maximum Number of Non-local Horse Races per Simulcast Day Submitted by The Hong Kong Jockey Club to the HKSAR Government

Background

4Racing was established in May 2020 after Phumelela Gaming and Leisure was placed under business rescue earlier in February 2020. The implication of a complete liquidation would have been an industry facing a complete collapse/demise and dire consequences not only for the remaining racing operators, the tote product, breeders, and the entire workforce (jockeys, trainers, grooms, work riders, etc.). This would have been a huge blow given that South African racing is globally recognized for its quality.

Mary Oppenheimer Daughters (MOD) stepped in and a new operator, 4Racing was established with the following objectives:

- Create a sustainable industry to protect the workforce, in particular the most vulnerable in the form of grooms.
- Create strong and strategic partnerships.
- Focusing on growing the tote and increasing tote revenues - which fund the business of horse racing. All profits are channelled back into the industry, especially the lower levels - to improve lives.

4Racing, after receiving the required licenses from authorities, started officially operating on 1 Dec 2021. 4Racing is licensed as a tote operator across 7 provinces within South Africa, and has 3 racing centres, with a racing calendar that spans over 180 race days of which 8 are Group 1 races, 4Racing is the largest operator within South Africa. Similarly, with a span of over 200 stores/agencies, this makes 4Racing the largest retail operator. We have a strong Africa partnership model and are looking to promote the tote and racing across the continent. All these presents a compelling rational and a number of potential options for World Pool events.

The Need for Simulcast/World Pools

Since coming into operation, one of the biggest challenges we have faced is the growth of illegal betting and tote derivative products and as a result the liquidity of tote pools have come under pressure.

The World Pool concept is one of the most effective ways to combat illegal betting and these tote derivative products. Channelling global fans into one legal pool is the best alternative to the illegal scourge. A further consideration is that liquidity begets liquidity and therefore has a snowball effect on tote revenues.

World Pools also help encourage global partnerships between legal operators. This in turn facilitates the sharing of ideas and upliftment of every one's offering to the Fans and stakeholders to be worthy of a World Pool event.

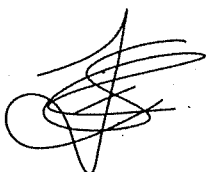
Globally it's typically the Tote Operators who are responsible for sustaining the horseracing industry and the many related jobs associated with such a labor-intensive industry. Simulcast reciprocity (the forerunner for world pools), a system that allows racing operators to share their pictures with each other and very importantly reduces the costs of producing and broadcasting live racing as operators can share the costs of production and distribution while at the same time allowed racing fans to enjoy and wager on races from different locations via legal wagering channels.

In conclusion, we cannot over emphasise the support in the sustainability and protection of the Tote these simulcast and especially world pool events provide. In a world where alternative betting products, often illegal, are becoming more and more prevalent it is critical that Racing and Tote operators offer the most comprehensive product offering to their customers and fans have access to these opportunities from all around the globe.

Licensed/Legal Operators also are required to have extensive responsible gambling measures in place and these measures are well regulated. Increased world pool events on a sport that requires a fair measure of skill and knowledge will therefore not unduly increase the risk of excessive gambling.

Lastly, we cannot escape the fact the illegal operators that step into any vacuum or opportunity make no contribution to taxes, charitable causes, the community and the sustainability of industry.

Yours faithfully



FUNDISWA SITHEBE
CHIEF EXECUTIVE OFFICER
4RACING PROPRIETARY LIMITED

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及(ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

本會同意馬會建議書中提出增加聯播賽事，一來可令政府稅收增加，令政府可將更多資源投放給有需要的地方，改善市民生活，二來馬會增加的博彩及獎券收入，部份除投放於慈善的用途上照顧有需要的市民，同時，亦可將一些收入直接支持各項體育發展。本會一直是馬會的受惠機構，亦一向致力培育單車運動人才及向市民大眾推廣單車運動，與馬會的理念一致，基於此原則，本會支持馬會所提出的建議。

姓名： 梁鴻德

所屬機構（如適用）： 中國香港單車總會有限公司

日期： 21/8/2023

簽署： 

註：請細閱後頁個人資料收集聲明。

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

Please refer to the enclosed letter.

Name : Wendy Tsang

Representing organisation (if applicable) : Hong Kong Youth Arts Foundation

Date : 16 August 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.

16 August 2023

Secretariat to the Betting and Lotteries Commission
13/F, West Wing, Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong

Attention: Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.,
Chairman, Betting and Lotteries Commission



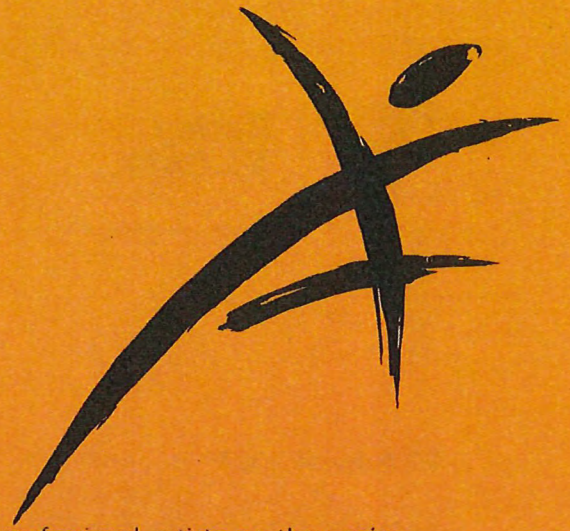
Dear Mr Yip,

Re: Hong Kong Jockey Club's Proposal of Increasing the Number of Simulcast Days

The Hong Kong Jockey Club is a strong supporter of the Hong Kong Youth Arts Foundation (HKYAF). Without the Jockey Club's support, we would not be able to achieve our mission of providing inclusive and inspirational art projects for youngsters of all cultures, backgrounds, languages and abilities.

Since 2010, the Jockey Club has generously funded over HK\$70 million for 12 of HKYAF's large-scale community art projects, allowing us to engage with over 662,000 youth participants. These projects include *Hong Kong Jockey Club Pointe to Pointe Site Specific Project 2009, 2010 and 2011*, the *Jockey Club Community Arts Biennale (Visual Arts and Performing Arts) 2013, 2015 and 2016*, *"Melodia" Theatrical Experience and Outreach Arts Education Programme 2016*, the *Jockey Club Community Project Grant 2017 – 2020, 2020 – 2023 and 2023-2026* the *Jockey Club "Project Sliver" Intergenerational Arts Project 2019 – 2023* and the *Jockey Club Community Sustainability Fund 2020 – 2021*.

The funding enables HKYAF to provide free-of-charge opportunities and educational online workshops for participants to explore the topics of bullying, climate change, age inclusivity and creative ageing. The projects also empower youths to enhance their creativity and self-confidence and develop important life skills, including communication, team building, management and leadership. Furthermore, these projects focus on inspiring creativity among our communities where we have worked with the elderly, ethnic minorities, refugees, students and teachers, at-risk youths and individuals with long-term illnesses and special needs. Aside from conventional exhibition spaces and theatres, our projects and events have also ventured into hospitals, public spaces, local schools, youth and community centres, parks and social service and elderly care centres.



HKYAF has enriched the lives of many youngsters and professional artists as they gain experience, learn from and are inspired by local culture and their communities through these projects. We have also worked with members of the public and help cultivate social inclusion through the arts. Undeniably, the support from the Jockey Club has been tremendous in helping us expand our reach in Hong Kong.

The Jockey Club's unique business model enables surplus funds to go towards numerous charitable organisations and projects. And the way the funds are distributed across multi-year projects allows HKYAF to grow and develop sustainable programmes that have greater long-term impacts and effects.

The Jockey Club is one of HKYAF's largest sponsors as well as one of Hong Kong's largest community benefactors. The funding made available not only helps to improve society in the aforementioned ways but also provides opportunities for arts and creativity to grow and thrive in our society. This helps to boost the city's cultural capital, which in turn helps to advance Hong Kong on the global cultural map.

For all reasons mentioned above, we fully support Jockey Club's proposals on the new arrangements for horseracing.

Yours faithfully,

Wendy Tsang

Director



D006 2023-24



22 August 2023

Secretariat to the Betting and Lotteries Commission
13/F, West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Via email: ha2@hyab.gov.hk

Dear Sir/Madam,

Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

Racing Victoria Limited (RVL) is the governing body for thoroughbred horse racing in the State of Victoria, Australia. RVL, including via its subsidiaries Racing.com Media Pty Ltd (RDCM) and RVL Media Pty Ltd (RVLM), has a significant and valued relationship with the Hong Kong Jockey Club (HKJC). This relationship has produced great benefit for both parties, their respective racing industries and the wider economy and community.

Central to this relationship are the following key arrangements:

1. *Broadcast Rights Arrangement*: an arrangement to broadcast all Hong Kong thoroughbred racing across our free to air, pay television and digital platforms within Australia; and
2. *International Distribution Arrangement*: when the HKJC is able to operate the World Pool, or co-mingle with the Victorian Pool (for example the Melbourne Cup) for Victorian thoroughbred races, arrangements to enable both the simulcast of Victorian thoroughbred racing into Hong Kong and the commingling of our racing into that World Pool.

The RVL group has been in discussions with the HKJC regarding its proposal to include several Victorian thoroughbred race meetings within its World Pool offering in 2023 and is excited to support the HKJC in its proposal, which we believe will be beneficial to both the Victorian racing and Hong Kong racing industries, as well as the broader community and economies in both jurisdictions who benefit directly and indirectly via these arrangements.

We have received a copy of the Betting and Lotteries Commission's notice with respect to the HKJC's proposal to:

- (i) increase the maximum number of simulcast races per year from 10 to 25; and
- (ii) increase the maximum number of non-local races per one simulcast day from nine to 12;

starting from racing season 2023/24.

We provide this letter in support of the HKJC's proposal as described above.

Our arrangements with the HKJC are particularly valuable in that the simulcast reciprocity they engender enables racing enthusiasts in Australia and Hong Kong access to high quality, highly competitive and tightly regulated horse racing which can only grow the mutual interest in, and integrity of, our sport.


For RVL and its subsidiaries, having the ability to showcase Hong Kong racing across our channels strengthens the connection with our audience base by providing a world class racing product to complement our own racing here in Victoria. This is also particularly true given the comparable and complimentary time zones and "days of racing" that exist between our two jurisdictions. Conversely, having our premium meetings broadcast into Hong Kong enables us to showcase our product into one of the most powerful racing jurisdictions in the world with which Victoria has always had such a strong and enduring relationship.

To support this vision, we also need to provide a competitive wagering product capable of attracting wagering investment via legalised wagering channels. The comingling of the Tabcorp-operated VICTAB and the HKJC totalisator pools for HKJC meetings broadcast into Australia means that our customers can not only enjoy watching the races but they can also bet into strong regulated parimutuel pools offering true value for their wagering investment. The introduction of the World Pool by HKJC has elevated this co-mingled wagering offering to a new level by creating a level of liquidity in a global pool which ultimately benefits wagering customers (via better wagering returns), wagering operators (via higher betting pools) and Racing Clubs (via higher income from wagering activity on their product). For the racing industry to meet the challenges of increased competition from other sports and leisure activities, the benefits accruing from simulcast reciprocity are becoming increasingly important.

This shared interest in promoting and growing racing in both Hong Kong and Australia via simulcast reciprocity has had the additional benefit of developing a close working relationship between our jurisdictions. To ensure concepts such as World Pool and broadcast simulcasts are successfully managed and cost efficient requires a high level of joint co-operation. The recent success of the Lightning Stakes World Pool Day in February 2023 in Melbourne, where RDCM and RVL were able to work with the HKJC, Tabcorp and the Victoria Racing Club to create a highly successful World Pool meeting is evidence of the value of such arrangements for all involved. The Lightning Stakes World Pool Day delivered significant financial and promotion gains for all parties involved and we look forward to continuing and growing our valued relationship with the HKJC via future arrangements.

Each of the under-signed would willingly speak to this submission if asked, and trust that the consideration which is currently before the Betting & Lotteries Commission is regarded favourably.

Yours sincerely



Andrew Jones
Chief Executive Officer
Racing Victoria Limited



Peter Campbell
Chief Executive Officer
Racing.com Media Pty Ltd

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

I support both proposals. Key reasons are:

1. The market, the needs are there. If we / HKJC doesn't do this formally and legally, there are so many open market and ways to do illegally without control anyway.

2. With HKJC to increase simulcast races in number and per one simulcast day, this can help to formalize a portion of the bet and redirect the resources to finance social impact projects — much better than loose to other illegal operators.

3. If I can add, it's good to add limitation to youth.

Name : Anders Leung

Representing organisation (if applicable) : Run Our City Foundation Ltd.

Date : Aug 22, 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及(ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

本港在世界賽馬產業一直處於領導地位，賽馬業對香港的經濟發展及慈善業務亦相當重要。

我們相信，隨著現今資訊科技發達，尤其在疫情後市民大眾對互聯網的应用，都會令香港馬迷對非本地知名賽事的興趣日增，但在缺乏合法投注渠道的情況下，只會令馬迷轉投非法途徑，因此本會絕對支持馬會建議，不但可以打擊非法博彩，亦可進一步令香港賽馬業與世界接軌，同時可以增加收入及慈善捐款。馬會透過稅款多年來一直成為是文化界最大的贊助人，本團的「獅子山傳奇－一口子歷史戲劇計劃」就是由馬會贊助，透過邀請18區共三百多位耆翁，以不同形式的表演和展覽，走進學校、社區，分享他們的生命故事，受益至今已超過130,000人，更重要是改變了不少耆翁的人生，在舞台上給他們第二生命，讓他們重拾自信。如果馬會可以增加收入來源，相信將會有更多這類優秀藝術項目可以在充足的資源下開展。

姓名

: WONG YEE MUN, GLADYS

所屬機構（如適用）

: CHUNG YING THEATRE COMPANY LTD.

日期

: 22/8/2023

簽署

: 

註：請細閱後頁個人資料收集聲明。



香港遊樂場協會

HONG KONG PLAYGROUND ASSOCIATION

Our Ref.: ADM-COR-23-028
Your Ref.:

Patron 贊助人

The Honourable John KC LEE,
GBM, SBS, PDSM, PMSM
The Chief Executive
Hong Kong Special Administrative Region
People's Republic of China
中華人民共和國香港特別行政區行政長官
李家超先生, 大紫荊勳賢, SBS, PDSM, PMSM

President 會長

Mr. Victor Hui Chun Fui, GBS, MBE, JP
許晉奎, GBS, MBE, JP

Managing Vice President 常務副會長

Dr. Lam Hoi Ham, LLD, JP
林海涵博士, LLD, JP
Mr. Pang Sung Yuen, SBS, CSDSM
彭詢元先生, SBS, CSDSM

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Prof. Herman Hu, GBS, JP
胡曉明教授, GBS, JP

Chairman 主席

Mr. Sin Yat Kin, SBS, CSDSM, JP
單日堅, SBS, CSDSM, JP

Vice-Chairman 副主席

Mr. Arthur K. C. Li
李傑之先生

Hon. Treasurer 義務司庫:

Ms. Fiona Lam
林靄欣女士

Hon. Legal Advisor 義務法律顧問:

Mr. Kong Churk Hoi Billy, BBS, MH, JP, LL M
江焯開, BBS, MH, JP, LL M

Auditors 核數師:

Fan, Chan & Co. Limited
范陳會計師行有限公司

Executive Director 總幹事:

Dr. Wan Lap Man
溫立文博士

香港添馬添美道 2 號政府總部西翼 13 樓
(博彩及獎券事務委員會秘書處收)

Email: ha2@hyab.gov.hk

民政及青年事務局
博彩及獎券事務委員會
葉振都主席:

就香港賽馬會增加賽馬博彩活動的建議 香港遊樂場協會提供以下意見

本會是根據香港法例第 1061 章《香港遊樂場協會條例》成立的慈善團體，主要透過分佈全港各區的青少年中心，場館，營地和服務單位提供不同類型的體育文化活動以及社會工作輔導培育香港青少年。

高危青少年服務是協會其中一個服務重點，我們透過協會各區的地區青少年外展隊，深宵外展隊，社區支援服務計劃(輔導接受警司警誡青少年)，接觸和輔導大量有偏差和高危行為的青少年，其中不少涉及違法活動。參與及協助非法賭博對高危青少年有頗大影響，現時不法分子透過互聯網招攬年青人參與其中賺取報酬，或藉此控制青少年參與違法活動。

就香港賽馬會增加賽馬博彩活動的建議增加同步聯播賽事以及轉播非本地賽馬賽事場數上限，本會同工根據這建議，在衡量增加轉播賭博賽事與賭博納入正規化的利害後，本會贊同香港賽馬會的有關建議，原因如下：

- 1. 賽事資訊流通:** 香港市民和青少年現時可以透過互聯網隨時接觸世界各地賽事並參與網上賭博，即使否決有關建議仍然不能阻止青少年和市民觀看有關賽事。
- 2. 打擊本地非法賭博:** 由於上述賽事市民容易接觸卻沒有合法途徑參與賭博，本地不法分子透過營運外圍賭博網站提供非法賭博途徑，增加合法轉播場數反而能夠減少非法賭博經營空間。



香港遊樂場協會

HONG KONG PLAYGROUND ASSOCIATION

Our Ref.: ADM-COR-23-028

Your Ref.:

Patron 贊助人

The Honourable John KC LEE,
GBM, SBS, PDSM, PMSM

The Chief Executive
Hong Kong Special Administrative Region
People's Republic of China

中華人民共和國香港特別行政區行政長官
李家超先生, 大紫荊勳賢, SBS, PDSM, PMSM

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許晉奎, GBS, MBE, JP

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單日堅, SBS, CSDSM, JP

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Dr. Wan Lap Man

溫立文博士

- 3. 減低青少年被不法分子利用機會:** 非法賭博經營者因為沒有經營限制, 為增加利潤會不擇手段吸引年青人參與或協助非法賭博。青少年因參與非法賭博欠下債務, 更有可能被不法分子利用作出違法事情。
- 4. 加強博彩監管:** 由於香港賽馬會在營運博彩業務上受法例監管, 既然上述賽事已經在社區和民眾間流行, 由香港賽馬會營運反而可以加強博彩監管, 加強政府的控制。
- 5. 增加回饋社會:** 博彩業盈利豐厚, 每年香港賽馬會就博彩收入撥出一定比例支持本地社會服務, 增加賽馬博彩活動一方面能滿足市民需要同時能夠有更多資源支持本地社會服務, 回饋社會造福大眾。



香港遊樂場協會

2023/8/23

就博彩及獎券事務委員會（博獎會）公眾諮詢

香港青年協會提交之意見

本會作為本地的非牟利志願服務機構，一直接受不同慈善機構提供之財政資助，香港賽馬會即為其中之一。作為受助機構，對於該會在博彩事務以外，肩負慈善功能與推動創新角色，體會甚深。本會謹以過去工作經驗為基礎，陳述有關意見。

（一）長久而明確的慈善策略

香港賽馬會一直推動本地慈善事務發展，更位列全球十大慈善捐助機構。在長達 3 年的疫情，該會迅速採取多項措施，大力支援社區抗疫。在 2021/22 年度，該會的慈善信託基金已審批捐款為 66 億港元，遠高於基金近兩年的 45 億港元恒常年度捐款¹，資助本地非政府機構、社會組織、學術團體的慈善及社區計劃，惠及香港社會各個群體與階層。

單以 2021/22 年度為例，該會所作之 66 億港元慈善捐款，惠及 292 個慈善及社區項目²。在 2022/23 年度，社會福利署為本地非政府機構提供的經常性資助約為 233 億港元³；香港公益金則撥款逾 2.7 億港元，予 168 個會員機構⁴。香

¹參考香港賽馬會《2021/22 年報》

https://corporate.hkjc.com/corporate/common/annualreport/pdf/HKJC_AR2022_Full.pdf

² 同上

³ 參考社會福利署網站資料 https://www.swd.gov.hk/tc/index/site_pubpress/page_fact/

⁴ 參考香港公益金網站資料 https://www.commchest.org/zh_hk/projects/current-year-allocation

港賽馬會是繼政府以外，全港最大型提供資助的慈善機構；對本地慈善事業發展影響深遠。

相對於社會福利署及香港公益金，香港賽馬會以獨特的綜合營運模式，結合體育、博彩與慈善事業，每年透過捐款及繳納稅項，將 77% 的收入回饋社群⁵。其撥款資助慈善事業數額之大，涵蓋服務範疇之廣，均是其他慈善機構難以取代的。

(二) 支持創新與青年服務，主動辨識及解決社會問題

根據我們的經驗，香港賽馬會的慈善工作十分重視創新和成效，對青少年發展尤其關注。一些具前瞻性的長遠發展項目，對香港持續發展、促進社會文明進步，均甚具意義。其中新猷包括：推動青年與社工聯手創新的「賽馬會 21 世紀綜合青少年服務中心計劃」、以跨界別方式聯同六間非牟利機構和香港大學推行的「平行心間計劃」、為青少年提供網上情緒支援的文字輔導平台「Open 喻」，以至捐助各類長者、健康社區、人才培育和體育文化相關的慈善項目，均是顯著例證。

⁵ 參考香港賽馬會《2021/22 年報》

https://corporate.hkjc.com/corporate/common/annualreport/pdf/HKJC_AR2022_Full.pdf

此外，馬會長久以來為內地的馬匹運動發展作出卓越貢獻，以今年即將舉辦之杭州亞運會為例，一方面為馬術項目提供技術支援，另方面為本地青年義工提供培訓，包括學習馬術競賽知識，以及參與國際大型賽事的機會，讓青年義工於亞運會同出一分力，有助培育他們國際視野和團隊合作精神。

(三) 為本港非政府服務機構提供穩定財政資助

香港賽馬會積極投放資源，為本地非政府機構、社會組織及學術團體提供財政資助，並致力推行創新服務模式，為社福界引進新思維，同時加強慈善工作的效益，該會致力協助業界提升服務水平，增強捐款受助機構及受益人士的知識及營運能力。

以本會服務為例，在 2021／22 及 2022／23 年度，香港賽馬會慈善信託基金資助本會的開支，是繼政府津貼、活動收入、個人或機構贊助以外的主要來源。基金特別支持本會發展多個重要項目，照顧青年身、心、社、靈不同方面需要，包括 21 世紀綜合青少年服務中心的工程(逾 9,000 萬港元)、成立數碼技能轉型中心(逾 1,200 萬港元)、推廣義工服務的眾心行善義工推廣校園夥伴計劃(逾 3,800 萬港元)、防止自殺的「網上危機支援服務」(逾 3,200 萬港元)、以及支持跨代樂融 Hub 計劃(逾 650 萬港元)等。

總括而言，香港賽馬會對本地慈善公益事業的重要性毋庸置疑。透過不同形式的捐獻，結合慈善及社區貢獻的綜合營運模式，為社區創造經濟及社會價值，致力建設香港成為一個更美好的社會。該會的穩定收入，對其繼續發揮上述慈善功能十分重要。我們期望這個經長久建立的有效功能得以持續，為本地福利服務提供創新空間和提升的機會。

我們認為，馬會作出有關新安排的同時，政府當局必須採取有效的博彩監管措施，加強打擊線上線下非法賭博活動和嚴厲執法，以保障市民、尤其青少年的身心健康發展。社會各方亦應致力避免青少年受到賭博誘惑，加強提供並支持有益身心的正向活動。此外，政府亦應持續推行公眾教育，並製作相關影片，協助各階層加深認識賭博禍害，防止他們沉迷賭博。同時，當局必須為賭博失調者及受影響人士提供全面的輔導支援和治療，以免造成深遠的個人及社會問題。

— 完 —

2023年8月22日

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

Jockey Club CADENZA Hub ("JCCH") established in 2009, located in Tai Po, managed by the Faculty of Medicine of The Chinese University of Hong Kong. JCCH provides one-stop, diversified and integrated health services with our multidisciplinary team aiming at raising health literacy and awareness of community dwelling people. The core services of JCCH include day care services for the elderly, rehabilitation programs and wellness-focused primary care programs etc. In the past 10 years or so, over 350,000 attendances have been reached through our services. We are supportive of the proposal of the Hong Kong Jockey Club to increase the maximum number of simulcast races from 10 to 25 per year and non-local races per one simulcast day from 9 to 12 ("the Proposal"). We believe that the additional betting venue generated from the Proposal would benefit the society of Hong Kong in terms of additional charitable donations to the development of the forward-looking Projects. We anticipate no adverse impact of the Proposal on our society.

Name : Florence Ho

Representing organisation (if applicable) : Jockey Club CADENZA Hub

Date : 22nd August 2023

Signature :  _____

Note: Please read the Personal Data Collection Statement on the next page.



By Email: ha2@hyab.gov.hk

18th August 2023

Mr. Adrian Yip Chun To
Chairman
Betting and Lotteries
Commission c/o Home
13/F West Wing
Central Government offices
2 Tim Mei Avenue
Tamar, Hong Kong

Dear Mr Yip

We are writing to support the Hong Kong Jockey Club's (HKJC) application for increased international simulcast opportunities. On HKJC's proposal of increasing the maximum number of simulcast days per year by 15 and increasing the maximum number of non-local horse races per simulcast day, Ascot Racecourse's comments are below.

Ascot's own parimutuel betting operation, "Bet With Ascot," bets into the Hong Kong Worldpool, working alongside the UK Tote. This happens at Royal Ascot in June, at the King George Meeting in July and on British Champions Day in October, with significant shared benefits.

The opportunity to expand this international collaboration would be most welcome as standing still might otherwise limit the project's development.

Ascot Racecourse is proud to be a long-term partner of the Hong Kong Jockey Club. Regularly horses that race at Ascot compete in the two major international meetings staged at Sha Tin and we have, in turn, often welcomed horses trained in Hong Kong to our major international meeting, Royal Ascot.

For example, Wellington (currently one of the best sprinters in Hong Kong), participated in the Group 1 Queen Elizabeth II Jubilee Stakes at Royal Ascot this year. In addition, Hong Kong jockey Matthew Chadwick rode in the Shergar Cup team jockeys' competition at Ascot this month so our interaction is both equine and human.

Ascot is also a partner with HKJC in the relatively new digital venture, World Horseracing, which operates on various social media channels. Other partners include the VRC in Melbourne, Goodwood in the UK and Breeders' Cup in the US.

All such activities are interlinked with the racing itself, which is important for ongoing engagement with the sport's customers, new and future.

There are many Group One races and racedays around the world not currently included in Worldpool. The worthy aspiration of HKJC is to include as many of the top 100 races as possible, as assessed in the globally ratified and International Federation of Horseracing Authorities-backed Longines World Rankings.



Further collaboration through more simulcast opportunities would enable Hong Kong racing fans to enjoy more high quality horse racing events from around the globe on a more regular basis. One day, we hope that this may expand to our own international team jockeys' competition, the Shergar Cup, in which Hong Kong jockeys regularly compete.

In summary, we support the proposals submitted by HKJC and believe that the opportunity to extend Worldpool is something very much in the interests of the business of world racing, the HKJC and its considerable charitable beneficiaries and fans in Hong Kong.

Yours sincerely

Felicity Barnard
Commercial Director

Nick Smith
Director of Racing and Public Affairs

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

Jockey Club Centre for Positive Ageing is a non-governmental organisation operating on self-finance basis devoting to serving people with dementia and their formal and informal caregivers in Hong Kong. We are one of the numerous beneficiaries of The Hong Kong Jockey Club Charities Trust ("The Trust") that we receive charitable donations from The Trust to develop innovative interventions and services that have long-term impact and benefits to the dementia community in Hong Kong. While we would not like to comment on the potential impact of the Proposal, we fully support the philanthropic achievements of the Hong Kong Jockey Club

Name : Professor Timothy Kwok

Representing organisation (if applicable) : Jockey Club Centre for Positive Ageing

Date : 23 August 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.



香港添馬添美道2號政府總部西翼13樓
博彩及獎券事務委員會
葉振都主席

葉主席：

有關「香港賽馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次」之意見

香港賽馬會建議增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次，香港弦樂團對此表示支持。

香港賽馬會是香港主要的慈善機構，對社會發展作出重大的貢獻。馬會能夠回饋社會，有賴其獨特的綜合營運模式，透過賽馬及博彩業務所得收益，為社會帶來稅收及慈善捐款。香港賽馬會慈善信託基金資助多項針對香港弱勢社群、青少年及長者等的創新項目，以配合政府促進社會和諧的工作，為香港社會帶來莫大的益處。

香港弦樂團以「培育年青音樂家，傳遞音樂的快樂」為宗旨，透過培養本地年輕音樂精英，實現他們成為專業音樂家的夢想。同時透過給予他們舞台演出機會，將音樂的歡樂傳遞到香港每一個角落，及促進本港音樂文化發展。

香港賽馬會是香港弦樂團不可多得的合作夥伴，一直為本樂團重點的青年項目「賽馬會音樂能量+計劃」持續提供資助至今七年多。馬會的慷慨捐助令本樂團得以為600多名基層兒童提供免費弦樂訓練，以促進青少年發展。

非法賭博亦會令政府稅收及馬會的慈善捐款流失。馬會一直全力協助打擊非法賭博，並提高大眾對非法賭博問題的意識。香港賽馬會一直致力打擊非法賭博，並提高人們對問題的認識，特別是對青少年賭博和病態賭博的問題。為預防未成年人士參與賭博，馬會作為一個負責任的博彩服務營運者，一直致力提倡有節制博彩。

本樂團感謝委員會對青少年賭博的問題表示關注。我們相信提供合法渠道讓市民投注更多同步聯播賽事有助打擊非法賭博，亦可為政府帶來額外稅收，並預計對青少年的影響。因此，本會對馬會的建議表示支持。

香港弦樂團希望博彩及獎券事務委員會可以接納香港賽馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次的申請。



姚珏
香港弦樂團藝術總監
2023年8月17日*



Kong String Orchestra Limited
香港弦樂團有限公司

To: [HA2/HYAB](#)

Subject: HKJC

Date: 2023年8月23日 9:20:26

Dear Sir/Madam

Greetings

We have been supported by the HKJC on a number of projects which have been providing timely support to young people and older adults.

If the additional resources can generate more resources for the social services without any adverse impact, it shall be supported.

Thank you for your attention.

Paul Yip

Director, HKJC Centre for Suicide Research and Prevention

Chair Professor, Department of Social Work and Social Administration

Associate Dean (Knowledge Exchange and Development), Faculty of Social Sciences

The University of Hong Kong

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

The Chinese University of Hong Kong (CUHK) is in support of the Proposals of HKJC of increasing the maximum numbers of (i) simulcast races and (ii) non-local races per one simulcast day.

The HKJC Charities Trust has been renowned as one of the world's top ten charities donors, and a long-standing staunch supporter of the University since the 1960s. The University has benefited from the Trust in various areas; ranging from campus development, scholarships, education, healthcare to community service projects. Some of the visionary initiatives of the University that are supported by the Trust and widely recognised by the public include the Jockey Club School of Public Health and Primary Care, Jockey Club Museum of Climate Change, Jockey Club Institute of Ageing, CUHK Medical Centre, and CUHK Jockey Club AI for the Future Project. For the past decades, the Trust also has devoted conscientious efforts in providing solutions to societal issues which are priorities of the Government.

In light of the significant contributions of HKJC to the Hong Kong society, we believe that the aforesaid Proposals would bring in additional revenue to HKJC and hence enhance the long-term sustainability of its Charities Trust in continuing its diversified philanthropic portfolio. Aside from the raise in revenue, the Proposals would further generate a substantial amount of betting duty of about \$279M per racing season for the Government and create job opportunities for Hong Kong citizens.

On the international front, the Proposals would also help tackle the issue of illegal betting by steering the betting demand for non-local horse races to the legal betting channel of HKJC; and maintain the status of Hong Kong as a world leader in horse racing industry by improving reciprocity to and partnership with overseas jurisdictions on Commingling and World Pool. All in all, our city would benefit from the increase in taxable income, and the growth of internationalisation of horse racing brought by the Proposals of HKJC.

Name : Professor Anthony Chan, Pro-Vice-Chancellor/Vice-President

Representing organisation (if applicable) : The Chinese University of Hong Kong

Date : 23 August 2023

Signature

: 

Note: Please read the Personal Data Collection Statement on the next page.



Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman
Betting and Lotteries Commission
Home Affairs Bureau
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

By email: ha2@hyab.gov.hk

16 August 2023

Dear Mr Yip,

Re: Hong Kong Jockey Club proposal to increase the maximum number of simulcast races per racing season and the maximum number of overseas horse races per simulcast day

We are aware that the Betting and Lotteries Commission is currently considering the Hong Kong Jockey Club's (HKJC) application to increase the maximum number of simulcast races per racing season and the maximum number of overseas horse races per simulcast day.

The International Federation of Horseracing Authorities (IFHA) would like to express its support for the HKJC's application. Simulcast of racing is vitally important for our global sport, and plays a key role in addressing some of the major challenges being faced by the international racing industry.

IFHA

By way of background, the IFHA is the global leader for the international sport of thoroughbred racing. It seeks to promote all facets of racing; protect the welfare of the equine and human athlete; and protect and grow its global social and economic significance for current and future generations. The IFHA's members are predominantly national racing authorities across the globe which stage thoroughbred races, and include the HKJC.

The IFHA's key objectives include, amongst other things:

1. identify, develop and promote best practices;
2. protect the welfare of horses and riders through promotion and co-ordination of standards;
3. promote and develop horse racing and thoroughbred breeding worldwide;
4. promote the integrity of horse racing, breeding, and aftercare standards;
5. develop, set and promote global standards in thoroughbred racing;
6. pursue and promote the marketing and commercial opportunities of horse racing worldwide; and

7. promote international competition.

It follows that the IFHA has a strong interest in assisting racing to continue to expand internationally, supporting international competition and networks, and identifying measures to enhance the commercial sustainability and success of racing into the future.

Importance of expansion of opportunities for global simulcasting

Over the years, racing has developed into a truly global sport – with intensified travelling of horses and jockeys across continents to participate in international racing events, and attracting a global interest. This development, which continues to gather pace, serves the modern fan, who can now enjoy not only strong local racing but the best of what the world has to offer, year round.

However, with significant advancements in technology and rapid digitalisation (facilitated by globalisation and accelerated during the pandemic), the racing industry faces major challenges, including changing consumer preferences and habits, alternative wagering technology and products, and huge growth in illegal betting markets.

Accordingly, the IFHA has recognized the importance of identifying ways to attract new fans and develop new revenue streams for the racing industry. These will be critical for the industry to fund core activities to meet key objectives, including in relation to strengthening of racing integrity (e.g. anti-doping and anti-illegal betting) and improving horse and human welfare. Amongst other things, driving growth through simulcast (and commingling) is a strong focus of the IFHA as it presents an unprecedented growth opportunity for the sport, which will assist in ensuring the long term sustainability of racing and its huge participant base worldwide. The expansion of opportunities for global simulcasting will also help further promote horse racing as a global sport, with world-class races in different countries more accessible to racing fans around the world.

The HKJC is recognised as one of the world's leaders in providing top-class racing. It also performs a critical role in promoting racing as a global sport, and has led the development of global simulcast and commingling, including through its establishment of the World Pool (which enables racing fans around the world to enjoy and bet legally into a single pool on the world's best racing events). The IFHA is of the view that by allowing the HKJC to increase the maximum number of simulcast races per racing season and the maximum number of overseas horse races per simulcast day, the HKJC will be able to attract more and new racing fans, and broaden the sport's appeal both in Hong Kong and globally. These increases will also enable the HKJC to strengthen its well-established simulcast wagering product and further expand commingling and World Pool event opportunities. With additional revenue derived from increased simulcasting, the HKJC will be in a position to continue to make significant contributions to the Hong Kong community, as well as to help the global racing industry pursue its important objectives.

Conclusion

The IFHA believes it is fundamental to the ongoing success of racing globally that racing fans are able to regularly watch and legally bet on races held in different jurisdictions. This is a major reason why we strongly support the advancement of mutually beneficial simulcasting arrangements worldwide.

As one of the world's leading racing jurisdictions, increasing the maximum number of simulcast races per racing season and the maximum number of overseas horse races per simulcast day in Hong Kong would greatly benefit the promotion of racing as a global sport.

The IFHA is grateful for the Commission's consideration of its submission, and we would welcome the opportunity to answer any queries in relation to it.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'B Kavanagh', with a long horizontal line extending to the right.

Brian Kavanagh
Vice-Chair
IFHA



23 August 2023

Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman
Betting and Lotteries Commission
Home Affairs Bureau
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

By email: ha2@hyab.gov.hk

Dear Mr Yip,

Re: HKJC proposal of increasing the maximum number of simulcast races per racing season and increasing the maximum number of overseas horse races per simulcast day

The Asian Racing Federation (ARF) understands that the Betting and Lotteries Commission is in the process of considering an application by the Hong Kong Jockey Club (HKJC) to increase (i) the maximum number of simulcast races per racing season, and (ii) the maximum number of overseas horse races per simulcast day. We would like to offer our views in support of the HKJC's proposal for consideration by the Commission.

The ARF – of which the HKJC is a full member – is a regional federation comprising 28 national racing authorities and racing-related organisations from across Asia, Oceania, Africa and the Middle East. The ARF is formally linked with the International Federation of Horseracing Authorities (IFHA).

Key objectives of the ARF include:

- to promote horse racing and breeding, and the integrity of the sport;
- to encourage and develop mutually beneficial objectives and strategies between racing organisations to aid the development of horse racing; and
- to encourage, promote and support international competition.

The ARF believes that, if implemented, the HKJC proposal would help in the fight against illegal betting within the ARF footprint, and also assist in promoting racing in the region and globally.

Tackle illegal betting by channeling demand to legal operators

The ARF's Council on Anti-Illegal Betting and Related Financial Crime (the Council) has published extensive research, including through a White Paper: Illegal Betting in an Asian

Context¹ (published in September 2018), which considered illegal betting in six jurisdictions (Australia, Hong Kong, New Zealand, Singapore, South Africa and South Korea) and highlighted existing and future threats posed by the rise of illegal betting.

This White Paper found that *“illegal betting is large and growing in every jurisdiction, with illegal profits of at least USD 4.2 billion a year across all six. The size of the illegal market is also growing faster than its legal counterpart in every jurisdiction.”* The White Paper concluded that illegal betting is a “huge cost to society”, and observed as follows:

“These costs can be divided into direct and indirect costs: the direct economic cost can be measured in lost tax revenue, duties and other payments which legal betting operators provide...plus the costs of treating gambling disorder caused by illegal betting.

Indirect costs include harm to society from gambling disorder-related issues, blows to the integrity of financial markets from money laundering, the funding of other criminality, and damage to reputation and sporting culture from match-fixing.”

Amongst the threats posed by illegal betting in the Hong Kong context, the White Paper found that Hong Kong bettors are targeted by a huge range of offshore and local illegal operators, many of which are linked to or directly run by organized crime.

Further, in the report entitled “A Report of Illegal Betting Growth During the COVID-19 Pandemic”² published by the Council in May 2021, it was noted that illegal betting profits in Hong Kong increased by 10-20% during the pandemic. This equates to an increase of between HKD 2 to 3 billion in illegal betting profits from Hong Kong with illegal betting operators, which is on top of the previously estimated HKD 12.5 billion in profits made by illegal betting operators in Hong Kong annually.

The ARF is concerned that the trend of strongly growing illegal wagering will continue throughout the ARF footprint, and indeed it appears to have expanded through the global pandemic. The offer of illegal wagering is particularly attractive to Hong Kong racing fans as they have no legal alternative means for placing bets on the major horse races around the world.

By allowing increases in the maximum number of simulcast races per racing season and the number of overseas horse races per simulcast day in Hong Kong, the HKJC will be better placed to recapture betting demand for international races from illegal operators. This will help divert funds away from the illegal market and back to the HKJC, where it can make valuable contributions to improving Hong Kong society and the domestic racing industry.

Promoting racing regionally and globally

The ARF is also of the belief that increases in simulcasting of major international races in Hong Kong will be highly beneficial for the promotion of racing both within the ARF

¹ The White Paper: Illegal Betting in an Asian Context can be accessed [here](#).

² “A Report of Illegal Betting Growth During the COVID-19 Pandemic” can be accessed [here](#).

footprint and across the globe. By providing consumers with more opportunities to watch and bet (legally) on high quality races from around the world, it is likely that more will become fans of racing. We see this as vitally important for the continued growth of racing, which is an increasingly global sport, with ever-growing movements of horses, jockeys and trainers.

Conclusion

In our view, increased simulcast of overseas races in Hong Kong is highly desirable in circumstances where it will likely:

- assist the HKJC in recapturing betting demand for international races from illegal operators, which will result in greater financial contributions to the Hong Kong community and the Hong Kong racing industry; and
- assist in promoting racing as a global sport both within Asia and internationally.

Thank you for your consideration of the ARF's submission. If you have any queries, or would like any clarification on the issues we have raised (particularly in relation to illegal betting in Hong Kong), please contact us.

Yours sincerely,



Greg Nichols
Vice-Chairman

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

We have carefully read this proposal and feel it reasonable and fair, reasons listed as below for your kind reference:

1. HKJC has been acting as the authority of betting in HK, their rich experience of regulating this industry is absolute.

Their well-designed internal control guidance and regulations has been ensuring the right trail and channel for betting activities. According to many news reports about peripheral gambling and illegal betting activities, it is obvious that the needs on betting activities of the public has been underestimated. So that if HKJC can add more betting activities, it may effectively reduce some of the illegal betting activities.

2. Based on past published data, HKJC has brought a lot of tax income to HK and has benefited various industries, the public community, and non-profit making organizations. As one of beneficiaries of HKJC charity fund we have been working with its charity team for many community-benefiting projects, and we have experienced their professional working attitude and felt their sincerity of caring the whole community. Not to mention the job opportunities that HKJC has provided and will provide.

Therefore, we would like to express our supportive comment on this proposal and wish a positive final result would be approved towards this new initiative.

Name : Joaquin TAM

Representing organisation (if applicable) : The Football Association of Hong Kong, China

Date : 17 Aug, 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.



CAPE RACING

17 August 2023

The Chairman
Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

Dear Mr Adrian Yip

HONG KONG JOCKEY CLUB REQUEST FOR ADDITIONAL SIMULCAST RACES/MEETINGS

Phumelela Gaming and Leisure managed Kenilworth Racing Propriety Limited ("Kenilworth Racing") until May 2020, and currently, Kenilworth Racing has assigned its broadcast rights to 4Racing Proprietary Limited ("4Racing") until 31 December 2024. For many years, Kenilworth Racing enjoyed a positive relationship with the Hong Kong Jockey Club ("HKJC"), the first South African racing operator to have its content simulcast by the HKJC in 2018. Over the last three years, Kenilworth Racing's premier race meeting of the racing season (The Cape Town Met) has formed part of the "World Pool" events.

The relationship between the HKJC and South African racing operators was established in mid-2008. At the time, the South African racing market faced challenges that led to an increase in the import of additional foreign content to help grow revenue to sustain the racing industry. This situation was not unlike similar challenges worldwide, where additional content was procured to prevent its residents from betting illegally.

Currently, many global racing jurisdictions rely on reciprocal simulcast arrangements to assist with the sustainability of their respective racing jurisdictions. The reliance on foreign simulcast products became a lot more prevalent during the COVID-19 pandemic when racing industries were forced to shut down; however, racing operators were given a lifeline by offering betting opportunities on foreign content to sustain a portion of their industry. The imported simulcast content business model is far more cost-effective than incurring the associated costs of staging the event and supplements the racing jurisdiction's income, which also benefits worthy social causes. These Community Service Initiatives ("CSI") form part of license conditions in certain South African Provinces.

Kenilworth Racing has benefitted by being part of the "World Pool" calendar for the last 3 years and has participated in other simulcast events since its inception. This concept initiated by the HKJC has assisted significantly worldwide in combatting illegal gambling activities. The HKJC richly deserves all accolades for their innovation, commitment, and initiative for developing this concept that offers simulcast races combined with consistent dividends by merging bets from several jurisdictions globally into a common pool and attracting new customers.



CAPE RACING

The National Horse Racing Authority of Southern Africa ("NHRA") governs the integrity of South African horseracing. It is a member of the Asian Racing Federation and the International Federation of Horseracing Authorities, both chaired by the HKJC. Through the membership of these two important racing bodies, the NHRA has maintained the integrity of the South African horseracing industry.

Kenilworth Racing and the other two South African racing operators simulcast all HKJC meetings throughout its season and participate in the World Pool meetings hosted by the HKJC.

Kenilworth Racing supports the HKJC's application to increase the number of simulcast races. Hopefully, this initiative will further strengthen the HKJC's position as the global leader in the horseracing industry.

Yours faithfully

Greg Bortz
Chairman



The Secretariat
Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

Via email ha2@hyab.gov.hk

22 August 2023

Dear Secretariat

Hong Kong Jockey Club's Proposals for Additional Simulcast Races

We are writing in relation to the proposal submitted by The Hong Kong Jockey Club (HKJC) regarding proposed changes to the regulations for the simulcast of non-local racing.

Firstly, introducing ourselves as Arena Racing Company (ARC), the largest racecourse owned group in the United Kingdom and alongside Racecourse Media Group represent UK racing globally.

As well as owning 16 racecourses, 5 greyhound stadia and 2 golf resort hotels, ARC is a leading racing media and betting rights organisation which returns significant investments which go back to fund our sporting industry and more than 4,000 people are employed in our company. Testament to our rich heritage in racing, ARC also holds the oldest classic event in the world, The St Leger at Doncaster each September.

There are several areas in which we believe that HKJC's proposal is of critical importance to the development of horse racing around the globe:

1) Internationalisation

HKJC's initiative in developing World Pool for simulcast has been a key strategic development in the internationalisation of horse racing.

Due to the nature of horse racing it has a now recognised world championship to provide a platform for internationalisation of the sport. This, compared to other sports, has been an inhibitor to the growth and development of the industry. However, HKJC's innovation with the World Pool has for the first time created a platform that links in a single product to the world's leading races, horses and jockeys. This provides a powerful proposition for the sport to become more internationalised and grow global reach.

Not only does internationalisation help grow consumer interest, it also assists the growth in the traffic of high quality racehorses between territories and thus provides added interest to the events.

2) Illegal Betting

As the rightsholder, we are very cognisant of the high level of illegal and offshore betting that takes place in the Far East on UK racing content and which denies funding to our industry.

Accordingly, we believe that HKJC's initiative to increase the simulcast of important and high quality races will provide racing fans with a legitimate route to bet on these races and which will thus help reduce the volume of illegal offshore betting.

We believe strongly that one of the key mechanisms for reducing illegal betting is to provide horse racing fans with high quality and legitimate access to betting as a better alternative to illegal offshore sites.

3) Development

The additional revenues generated by World Pool simulcast races is an important driver of incremental revenues which are re-invested by our racecourses to develop the quality of horse racing and which helps deliver sustainable development for the horse racing industry.

4) Consumer Proposition

The development of World Pool means that racing fans around the world are now able to be provided with a high quality schedule of international races alongside an innovative betting product that for the first time aggregates large betting pools. This will help widen interest in horse racing and will support the sustainable development of the sport.

5) Reciprocity

Simulcast reciprocity benefits operators in a number of ways. It helps build relationships between racecourses around the world and fosters cooperation within the racing industry, whilst reducing the costs associated with producing and broadcasting live racing telecasts, as operators can share the costs of communications, production and distribution.

We are very supportive of HKJC's submission to you since we believe that this provides an important opportunity for World Pool to lead the next phase of development for the global racing industry.

We hope that you find this letter helpful in your assessment of HKJC's submission to you. Should you have any questions regarding this, please do not hesitate to contact me.

Yours sincerely



Martin Cruddace
CEO



WOODBINE™

August 23, 2023

Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong

Sent via email ha2@hyab.gov.hk

Attention: Secretariat to the Betting and Lotteries Commission

Dear Sir/Madam,

**Re: The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

With almost 150 years of horse racing history, Woodbine Entertainment Group ("WEG") is the founding pioneer and largest operator of professional horseracing in Canada. WEG's Woodbine Racetrack, located in Toronto, Ontario, is a premier Thoroughbred racetrack in North America and the largest and most successful racetrack in Canada. Woodbine Racetrack runs 133 race dates per year, including the King's Plate, Canada's most prestigious championship Thoroughbred race and the 1st leg of the Canadian Triple Crown. The King's Plate is the longest-running race in North America; the 164th King's Plate took place on August 20, 2023.

In addition, WEG owns and operates Woodbine Mohawk Park, North America's premier Standardbred racetrack and home of the 2022 Breeder's Crown. WEG holds the pari-mutuel wagering license for the province of Ontario, and conducts the simulcast wagering for almost the entire racing product across Canada.

On September 1, 2021 WEG entered into a joint venture agreement for pari-mutuel wagering with the Hong Kong Jockey Club ("HKJC"). The agreement permits WEG to conduct pari-mutuel wagering on HKJC races in Canada; however, to date HKJC remains unable to wager on WEG's premier racing product.

As the Commission is aware, simulcast reciprocity is a system that allows horse racing operators to share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations via legalised wagering channels. It allows operators to offer a more comprehensive wagering menu to their customers, and wagering customers are able to access a wider variety of races and betting pools. It also provides a way for horse racing operators to increase their revenue by attracting new customers.

Simulcast reciprocity agreements can benefit operators in several ways. It can help to build relationships between tracks and foster cooperation within the racing industry, and to reduce the costs associated with producing and broadcasting live racing signals, as operators can share the costs of production and distribution.

Should HKJC be able to offer simulcast wagering on WEG races, this will not only permit HKJC's customers access to WEG's prestigious and popular racing product, but will also foster global racing business



WOODBINE™

development. WEG looks forward to entering into a reciprocal relationship with HKJC whereby the companies may combine their efforts to enhance and promote international horse racing.

Please don't hesitate to contact me directly should you wish to discuss this matter further.

Yours truly,
Woodbine Entertainment Group

DocuSigned by:

Chris Lush

77708EA5299A4CC...

Chris Lush

Chief Innovation, Technology & Wagering Officer

cc Jessica Ho, HKJC

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

ImpactHK Limited, a registered NGO supporting individuals experiencing homelessness, is very grateful for the support we have been given over the past few years from HKJC. On the streets, we have seen a dramatic rise in the numbers of individuals sleeping rough. We have also witnessed a greater deal of serious mental health disorders.

Without the support of HKJC, we would not be able to do what is needed to help the community and therefore we are supportive of this proposal.

Name

: Jeffrey Ralmeyer


Representing organisation (if applicable)

: ImpactHK Limited

Date

: 24/8/2023

Signature

: 

Note: Please read the Personal Data Collection Statement on the next page.



香港洛士文基金
Hong Kong Rosamond Foundation Company Limited



有關「香港賽馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次」之意見

香港賽馬會建議增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次，香港洛士文基金對此表示支持。

香港賽馬會是香港主要的慈善機構，對社會發展作出重大的貢獻。馬會能夠回饋社會，有賴其獨特的綜合營運模式，透過賽馬及博彩業務所得收益，為社會帶來稅收及慈善捐款。香港賽馬會慈善信託基金資助多項針對香港弱勢社群、青少年及長者等的創新項目，以配合政府促進社會和諧的工作，為香港社會帶來莫大的益處。

香港洛士文基金於2019年由多位來自不同行業的愛國愛港有心人成立，採用宋慶齡名譽主席英文名字 Rosamond 命名，宗旨是致力推進教育，讓年輕人增進多方面的知識，並推動香港兩岸四地的青年交流，培育青年成材，未來貢獻社會。


香港賽馬會是香港洛士文基金不可多得的合作夥伴，一直為本會重點的青年項目粵港澳大灣區青少年公益年會持續提供資助。馬會的慷慨捐助令本會得以繼續推動兩岸四地青少年的交流和合作，促進青少年發展和成長。

非法賭博亦會令政府稅收及馬會的慈善捐款流失。馬會一直全力協助打擊非法賭博，並提高大眾對非法賭博問題的意識。香港賽馬會一直致力打擊非法賭博，並提高人們對問題的認識，特別是對青少年賭博和病態賭博的問題。為預防未成年人士參與賭博，馬會作為一個負責任的博彩服務營運者，一直致力提倡有節制博彩。

本會感謝委員會對青少年賭博的問題表示關注。我們相信提供合法渠道讓市民投注更多同步聯播賽事有助打擊非法賭博，亦可為政府帶來額外稅收，並預計對青少年的影響。因此，本會對馬會的建議表示支持。

香港洛士文基金希望博彩及獎券事務委員會可以接納香港賽馬會增加同步聯播賽事及增加同步聯播日中的賽馬賽事場次的申請。

香港洛士文基金創會會長


胡曉明 敬啟

二零二三年八月十六日

HOPPEGARTEN

RACING BERLIN

Secretariat to the Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

By email ha2@hyab.gov.hk

Hoppegarten, 18.08.2023

Dear Madam/Sir,

The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

Berlin-Hoppegarten racecourse is proud to have been the first German racecourse to simulcast two races to Hong Kong on 14 August 2022, including the prestigious Group 1 Berlin Grand Prix. This was repeated on 13 August 2023, when bets on the same two races were commingled in the World Pool under Hong Kong Jockey Club leadership.

We wholeheartedly support the Hong Kong Jockey Club's application for an increase in the number of simulcast races on local HK race days from 10 to 25 and for an increase in the number of simulcast races on simulcast days from 9 to 12, for the following reasons:

- As all major sports, horse racing is becoming more international every year. Racing fans everywhere have an increased interest in following top horses from their country competing in other countries, as well as generally following the top horses and races in other countries. This enhanced international interest is borne out by the great success of the Hong Kong International Races. An increase in the number of simulcast races will satisfy a real demand and allows racing fans to better follow the sport they love and to make better informed wagering decisions.

- The Hong Kong Jockey Club only forms simulcasting agreements on a reciprocal basis with legalised wagering operators recognised by their national racing authority. This has a number of important benefits:

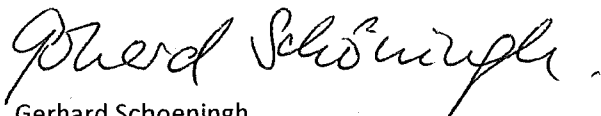
- These wagering operators are legalised and comply to high standards of customer care, addiction prevention, youth protection and compliance thus mitigating the risk of social and personal problems as well as criminal activity.

- In addition, legalised and recognised wagering operators contribute to the improvement of the race programme, equine welfare and integrity thus strengthening the health and sustainability of racing and wagering in their jurisdictions. When wagering takes place with unregulated or illegal operators, it is very likely that racing does not benefit at all or does not receive its fair share.

- We have been able to significantly improve the quality of our live TV production and broadcast. This would not have been viable with a national German pool alone. Simulcasting into an international pool with Hong Kong participation allows for a very high-quality production with production costs shared by many countries.

In summary, from an international perspective, an increased number of simulcast races will bring substantial benefits to customers as well as the sport of racing. It will also bring social benefits by reducing the amount of wagering activity in illegal or unregulated channels. We support this application without reservations.

Yours faithfully

A handwritten signature in black ink, reading "Gerhard Schoeningh". The signature is written in a cursive style with a large, sweeping initial 'G'.

Gerhard Schoeningh
Owner and Chairman
Berlin-Hoppegarten Racecourse

敬啟者：

香港賽馬會增加賽馬博彩活動 意見書

東冬地區聯會（下稱本會）於 2014 年成立並於 2020 年成為獲豁免繳稅的慈善機構，本會自成立起一直致力關注離島區內的弱勢社群，並透過一系列的扶貧及教育工作，支援離島區內的基層家庭，現在區內擁逾 2000 會員。

對於馬會建議把每年同步聯播賽事由 10 場增加至 25 場；及每個同步聯播日的非本地賽事場數上限由 9 場增至 12 場，本會支持馬會建議，意見如下：

改善非法外圍投注問題

本會與政府一貫的賭博政策精神一致，即不鼓勵賭博，但同時明白市民大眾對賭博活動有需求。本會在接觸及服務區內基層家庭時，深明市民參與非法外圍投注只會帶來更嚴重的高利貸問題，甚至因而成為病態賭徒，影響工作和與家庭關係。對於馬會增加賽馬博彩活動，相信可有助引導參與非法外圍投注者至合法的投注途徑，同時因馬會只接受現金及戶口投注，不接受市民透過信用卡投注及提供借貸，能確保投注者不因而欠下巨債。

增加地區就業機會

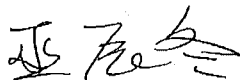
面對東涌新市鎮逐步發展，更多公共屋邨相繼落成，區內就業機會對基層家庭來說至關重要。馬會除了是全港最大的慈善資助機構外，亦是最大的僱主之一。本會知悉馬會現在離島區內設 3 間投注站，亦在鄰近大嶼山的青衣及荃灣區開設電話投注中心，不少東涌及離島區居民在馬會任兼職幫補生計，增加賽馬博彩活動預計可以為東涌居民及周邊地區的居民提供更多就業機會。

為庫房帶來額外收入回饋社區

本會過去在疫情期間與馬會合作，向離島區弱勢社群派發抗疫物資，緩解了不少基層家庭的需要。本會了解馬會現行的營運模式是把所得盈餘透過慈善捐款及稅款，資助各項慈善及社區發展計劃，同時因應馬會未來 5 年須額外繳交共 120 億元稅款，故馬會今次申請，有助拓展收入來源，同時亦可為庫房帶來額外收入，有助馬會持續支持各項社區活動。

總括而言，本會認為增加賽馬博彩活動效果正面，希望局方接納。本會同時亦促請政府持續打擊非法賭博，推行嚴厲的執法行動，減低對社會造成的不良影響，尤其是對基層家庭的危害。

東冬地區聯會副主席
巫辰冬 謹啟



2023 年 8 月 14 日



長春社 Since 1968

The Conservancy Association

13/F, West Wing,
Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong
(Attention: Secretariat to the Betting and Lotteries Commission)
Fax: 2591-6002
Email: ha2@hyab.gov.hk

Attention to Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P., Chairman, Betting and Lotteries Commission

Re: The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from 9 to 12, my comments are as follows:

I support the proposal submitted by the Hong Kong Jockey Club. The reasons are:

1) Betting Duty (Amendment) Bill 2023:

As a member working in the social service sector, even though I agree on the Betting Duty (Amendment Bill) for the annual special football betting duty, which is an important income for the HKSAR Government to support its public services, the impact of reducing the funding of the Charities Trust of HKJC still a great worry to the social sectors or other potential grantees. The current proposals by HKJC can help maintain sufficient financing of the Charities Trust to support diversified social services for the benefit of Hong Kong.

2) Significant social impacts:

The Charities Trust of HKJC is not just a crucial funding source to NGOs, but it also proactively looks into the needs of NGOs and provide strategic and timely supports, for example tailor made IT development and emergency funding during the pandemic. Those supports are particularly essential to small and medium-scale NGOs, which always lack the resources and knowledge to look into their longer-term development. Sufficient resource for the Charities Trust to maintain their supports to the NGO sector can improve the quality of the NGOs' operations and their services to the community in long run.





3) Providing stable employment opportunities:

As a part-time staff of HKJC during my undergraduate study 25 years ago, I appreciate that HKJC provides stable part-time job opportunities for youth and others to support their studies or living. The summer break of the race from July to August affects the sustainability of the incomes of the part-time staff. The proposed additional horse races, particularly those during the summer breaks can provide a more stable employment opportunity.

Given the insignificant negative impact as explained in HKJC's proposal and considering the potential positive impacts above. I support the proposal.

Should you have any questions, please contact me by phone at _____ or by email at _____

Name : SO Kwok-yin
Post : Chief Executive
Representing organisation : The Conservancy Association

Date: : 24 Aug 2023

Signature :





和譜之家
HARMONY HOUSE LIMITED

August 24, 2023

Hon. Life Patron
Mrs. Betty Tung

Board of Directors
Chairperson
Dr. Chak Wah Kam

Vice Chairperson
Ms. Daisy C. Y. Chui

Treasurer
Ms. Jean C.L. Chan

Directors
Ms. Hing Chun Wong
Mrs. Anna C. M. Koo
Mrs. Penny S.P. Crosbie-Walsh
Mr. Alexander H.S. Leung
Dr. William W.H. Chui
Ms. Louisa W.Y. Wong
Professor Janet Y.H. Wong
Ms. Deanna W.M. Wong
Ms. Caroline K.L. Leung
Dr. Dora C.W. Ho
Professor C.M. Lam

Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.,
Chairman, Betting and Lotteries Commission
Secretariat to the Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong

Dear Chairman Yip,

On behalf of Harmony House, I would like to support The Hong Kong Jockey Club's proposals of increasing the maximum number of simulcast races per year and increasing the maximum number of non-local horse races per simulcast day.

Harmony House is an ongoing grantee from The HK Jockey Club Charities Trust on helping the families and children of domestic violence. The donations we received is a key source of funding to fill up service gaps including male victims of intimate partner violence, men supportive services, outreaching emotion education for primary students by a special purpose van and self-compassion parenting education for suspected child abuse cases, etc. The Trust donations support significant gaps that Government or other funding sources cannot fully cover.

Hence, the stability of The Trust income is critical to its funding allocation for non-subsented services and pilot service projects in the future. The increasing simulcast races should lead to increase in business, which in turn will translate into more donation to the social sector for the benefit of the needy community groups and tax revenue to the Government. We hope our views can meet your consideration to the proposal from The Hong Kong Jockey Club. Thank you.

Yours sincerely,

Doris Lee
Executive Director
Harmony House



24 August 2023

13/F, West Wing
Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong
(Attention: Secretariat to the Betting and Lotteries Commission)
(E-mail: ha2@hyab.gov.hk)

Dear Sirs/Madams,

The Hong Kong Sports Institute Limited (“HKSIL”) would like to express its support for the Hong Kong Jockey Club (“HKJC”). As one of the major contributors to community support through the HKJC Charities Trust, the HKJC has long been a key supporter of the Hong Kong Sports Institute (“HKSI”) and elite athletes in Hong Kong.

The HKSI and the HKJC are aligned in their values regarding the importance of a strong sports culture in the community. Participating in sport has the potential to be a positive transformative experience for participants not only in terms of physical health but also psychological and social wellbeing.

Long term stable funding support is central to the development of a sustainable sport culture and the HKJC has earmarked Sport as one of its key strategic themes for support. Therefore the HKSIL supports HKJC initiatives which ultimately benefit the community, and add value to cross-sectoral efforts to promote active, healthy lifestyles and promote Hong Kong elite athletes’ opportunities to win sporting honours for Hong Kong.

Yours sincerely



Dr Trisha Leahy, SBS BBS
Chief Executive

UK TOTE GROUP

Secretariat
Betting and Lotteries Commission
13/f
West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong
ha2@hyab.gov.hk

Thursday 24th August 2023

To the Secretariat,

Hong Kong Jockey Club's submission to increase simulcast races

I am writing to you as Chairman of the UK Tote Group in support of the Hong Kong Jockey Club's (HKJC) submission to the Betting and Lotteries Commission to increase the maximum number of simulcast races per year from 10 to 25, and also to increase the maximum number of non-local races per one simulcast day from nine to 12 for the 2023/24 racing season.

By way of background, the UK Tote Group has been the owner of the UK Tote, the UK's leading pool betting operator, since October 2019. The UK Tote has been a core part of British horseracing since 1928, when it was established by an Act of Parliament to provide the public with a safe way to bet while also securing vital funds for the sport. These are principles we continue to operate under today.

Alongside the Hong Kong Jockey Club, the UK Tote is proud to be a founding member of the World Tote Association, with our Chief Executive, Alex Frost, co-chairing the organisation in 2023-24. Through the World Tote Association, all members are working together to increase international collaboration between racing nations, create the highest levels of integrity and standards in global betting markets, and improve the betting experience for customers.

UK TOTE GROUP

The UK Tote Group is a key strategic partner of the Hong Kong Jockey Club and in June both parties signed a new five-year agreement which commits us to work together to develop and grow pool betting for the betterment of customers and horseracing.

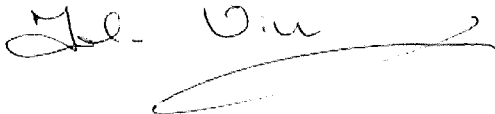
Working together through simulcast racedays is one of the most important areas of cooperation between the Hong Kong Jockey Club and the UK Tote Group. By allowing horseracing operators to share their live racing signals with each other both our organisations can enable racing fans to watch and wager on races from different locations via legal and regulated wagering channels, which make a financial return to horseracing to support a sustainable future for the sport.

At a practical level, simulcast reciprocity helps drive cooperation and efficiencies between operators as costs associated with producing and broadcasting racing can be shared. It therefore ensures each Tote operator can offer their customers a wider variety of races to bet on, which has greater appeal to existing and new customers, thus increasing revenues over time and the subsequent investment that can be returned to the sport through pool betting in the coming years. Developing and expanding this model is vital to the long-term health of the sport in all major racing nations, including Hong Kong and the UK.

The UK Tote Group is in full support of the Hong Kong Jockey Club's submission to the Betting and Lotteries Commission.

If you would like any further information about the UK Tote Group, please feel free to contact me via the email at the top of this letter.

Yours sincerely,



John MM Williamson
Chairman
UK Tote Group



2 August 2023

Secretariat to the Betting and Lotteries Division
13/F, West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Sent via Email: ha2@hyab.gov.hk

Dear Secretariat,

By way of introduction, the Thoroughbred Owners of California (TOC) is the organization that has approval rights of all wagering agreements between California racetracks and any other racing associations, other racetracks, off-track betting operators and advance deposit wagering companies. The TOC also serves as the organization that advocates for the horse racing industry on all issues impacting Thoroughbred owners before the California Horse Racing Board, the California Legislature, and the United States Congress.

This letter on behalf of the TOC provides written support of The Hong Kong Jockey Club request to increase the number of simulcast races, to be scheduled on the same day as local Hong Kong race meetings, from the current number of 10 per season to the newly proposed limit of 25 per season. In addition, the TOC supports the proposed increase on the maximum number of races which may occur on a "simulcast day" from nine to 12 to allow for a better customer experience as these are the world's premier race days.

Hong Kong is the home of many of the world's best races and horses, and this achievement is widely recognized across the globe. Horse racing is a global sport, with top-level racing in countries such as America, Great Britain, France, Ireland, Japan, Australia, and many others. For example, the Breeders' Cup World Championships will be held here in California in 2023 and 2024 at Santa Anita Park and Del Mar Thoroughbred Club, respectively, and will be held at Churchill Downs, home of the famed Kentucky Derby, in 2025. Major racing events such as these and other prestigious race days across the world serve as the foundation to simulcast reciprocity whereby major horse racing operators offer their live racing signals so that horse racing fans across the world can channel their high level of interest through legal wagering channels.

This allows racing operators the opportunity to present a better platform to watch and wager on these mega racing events, channeling gaming demand responsibly, through a sensible wagering menu and making these races available to a wider audience across the world. It also serves to increase revenues to all which benefit, including government, and an opportunity to retain and attract customers.

From my past experience, I am very familiar with the good work of The Hong Kong Jockey Club and its standing in the community, high level of integrity and its longstanding commitment to contribute in a meaningful way to local charities. It is important from a wagering and sporting perspective that the upper echelon of races and race meetings are permitted to leverage these unique opportunities when horse racing is at its very best.

The TOC enthusiastically supports the proposed increases in the number of days and the number of races. Please feel free to call on me if there is anything further you may need.

Yours sincerely,

William A. Nader
TOC President & CEO

22nd August 2023

Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.,
Chairman,
Betting and Lotteries Commission

**Subject: Support for HKJC's Proposal of Increasing Simulcast Races and Non-Local
Horse Races per Simulcast Day**

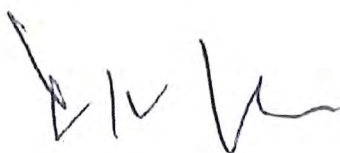
Dear Mr. YIP,

We are writing in our capacity as a governing body of sport in Hong Kong, to express our support for the Hong Kong Jockey Club's proposal to increase the maximum number of simulcast races per year and the maximum number of non-local horse races per simulcast day. We believe that this proposal holds significant potential to benefit multiple sectors within Hong Kong's community.

First and foremost, the Hong Kong Jockey Club's Charities Trust plays an essential role in supporting a wide range of charitable and other community projects and activities across the city. The Trust's contributions have had a profound impact on healthcare, education, social welfare, sports and other essential sectors. By increasing the number of simulcast races as proposed, it is reasonable to expect that the resources generated for the Charities Trust will also increase, allowing for the Trust's ongoing support to be extended towards important community initiatives.

Thank you for considering our support for this proposal. I trust that the Betting and Lotteries Commission will carefully evaluate the potential benefits and make decisions that will continue to strengthen our community and uphold the rich legacy of horse racing in Hong Kong and the support this brings to so many people.

Yours sincerely,



NG Kong Wan,
Chairman,
Hong Kong, China Rowing Association



**Hong Kong, China
ROWING ASSOCIATION
中國香港賽艇協會**

Passion to go beyond 熱愛·無限

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Anthony ROGERS, GBS, KC, JP
David SORTON

President
Mike TANNER, BBS, MH

Chairman
NG Kong Wan

Vice Chairmen
Ajmal Victor SAMUEL
YEUNG Yuk Man, Vick

Director of Finance
Thuan Gia TRAN

Directors
CHEUNG Ming Hang, Keith
LEUNG Ka Cheong
LUI Kam Chi
NG Wing Ning, Victor
Dr. Isa SCHEUNPFLUG
Mark WELLES
WONG Man Wai, Benjamin

Company Secretary
YEUNG Chun Wa, Ron

榮譽副會長
羅傑志先生, GBS, KC, JP
蘇俊偉先生

會長
鄧勳先生, BBS, MH

主席
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副主席
施杰浩先生
楊玉汶女士

財務總監
Thuan Gia TRAN 先生

總監
張銘恒先生
梁嘉昌先生
呂錦志先生
伍永寧先生
Isa SCHEUNPFLUG 博士
魏理思先生
王文偉先生

秘書
楊振華先生

A company limited by guarantee.
Affiliated to Fédération Internationale des
Sociétés d'Aviron, Sports Federation &
Olympic Committee of Hong Kong,
China and Hong Kong Water Sports
本會乃社團註冊之有限公司及國際賽艇
聯合會、中國香港體育協會暨奧林匹克
委員會及香港水上運動議會之屬會

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

VolTra has a longstanding relationship with the Hong Kong Jockey Club, working together on projects that focus on youth development through local and international volunteering service. Our combined efforts have led to the creation of innovative volunteering opportunities that have positively impacted the community at large. The Betting and Lotteries Commission's proposals to increase the maximum number of simulcast races per year and the maximum number of non-local horse races per simulcast day resonate with our shared vision of fostering economic growth and community support. The increase in betting activities is more than a commercial endeavor; it signifies a strategic alignment with global trends that ensures Hong Kong's continued competitiveness in the international betting arena. Moreover, it offers a regulated and responsible framework that reflects our mutual commitment to ethical conduct. The additional revenue generated through these proposals can be redirected to further charitable causes, including the empowering and transformative experiences we provide to the youth through volunteering. In recognizing the Jockey Club's significant contributions to various community initiatives, VolTra sees the proposals as a harmonious extension of our work. We believe that the integration of these changes into the existing framework will enhance the vibrancy of the local betting culture while upholding our shared values and dedication to community development.

Name : TANG Wai Wing, Bird

Representing organisation (if applicable) : VolTra

Date : 24 August 2023

Signature :  

Note: Please read the Personal Data Collection Statement on the next page.

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

Hong Kong Arts Centre (HKAC) would like to express our support for the HKJC's proposal.

We believe the potential revenue generated from this proposal will bring to a positive financial impact not only to the HKSAR Government, many organizations in the community, including HKAC will definitely benefit from the generous support through the donations by HKJCCT.

Since 1977, HKAC has been a platform for nurturing and supporting artists, and infusing art into everyday life. Its unique arts and educational programmes aim to make the arts accessible for all. Established over four decades ago, HKAC endeavours to bring arts to the people of Hong Kong – by presenting programmes for visual arts, performing arts, moving images and media arts, comics and animation. Other areas cover arts education, conferences, festivals, public art and community projects, all with the vision and mission of engaging and inspiring Creativity and inspiring creativity in the Hong Kong community. Over the years, HKJC has proven to be a valuable partner and their long-standing support for our initiatives has been exemplary.

Name

: REBECCA IP

Representing organisation (if applicable) : HONG KONG BETS CENTRE

Date

: 24 August 2023

Signature

: 

Note: Please read the Personal Data Collection Statement on the next page.

Personal Data Collection Statement

It is voluntary for any members of the public to provide his/her personal data as requested in this submission form. Any personal data provided will only be used by BLC for the purpose of understanding the views of members of the public on HKJC's proposals. If necessary, the submission and personal data collected may be transferred to the relevant Government bureaux or departments for the purpose of handling HKJC's proposals.

The written submissions received may be published to the media and the public. **If you do not wish your name / your representing organisation's name and / or your views to be disclosed, please specify in your submission.**

For access to or correction of personal data contained in your submission, please contact the secretariat in writing.

Address: 13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(Attention: Secretariat to the Betting and Lotteries Commission)
Fax No.: 2591 6002
E-mail: ha2@hyab.gov.hk

**Secretariat to the Betting and Lotteries Commission 28
July 2023**



BRISBANE RACING CLUB

25 August 2023

Mr Adrian Yip
Chairman of the Betting and Lotteries Commission
Betting and Lotteries Commission
13/F, West Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong.

Via Email: ha2@hyab.gov.hk

Dear Mr Yip

The Brisbane Race Club endorses the Hong Kong Jockey Club's application to increase the number of overseas races for simulcast at the Hong Kong Jockey Club venues.

As an introduction to the Brisbane Race Club, we believe the BRC has a strong connection with Hong Kong Racing including their current leading trainer John Size and leading jockey Zac Purton both commencing their careers in Queensland.

Leading Hong Kong stipendiary stewards such as Kim Kelly and Steve Railton began their careers at Brisbane tracks of Eagle Farm and Doomben, whilst Executive Director, Racing Andrew Harding held a prominent position in racing administration in Brisbane in his earlier career.

BRC members and directors have also regularly attended race meetings for many years and key racecourse management staff have travelled on scholarships to Hong Kong to learn best practice in racing and training management. The latter has been of tremendous benefit to the BRC in recent years with key learnings delivering very successful results for both the Eagle Farm course proper and the all-weather dirt training surface, both of which share similar management practices and climatic conditions.

The BRC makes the following submission in support of the request by the Hong Kong Jockey Club to the Commission in respect to increasing the number of overseas races for simulcast by the Jockey Club.

- An increase in the number of races simulcast by the Hong Kong Jockey Club will provide Hong Kong racing enthusiasts and potential new participants the ability watch and engage with more international racing.
- To date Hong Kong Jockey Club due to limitations has been unable to simulcast the Brisbane Race Club's premier racing carnival held during May and June (Stradbroke Season). To simulcast during the Stradbroke Season would open up new opportunities to continue with showcasing Australian Group racing consistently year-round.

EAGLE FARM & DOOMBEN

BRISBANE RACING CLUB LIMITED

- Simulcasting of Brisbane feature races and meetings affords opportunities for Hong Kong racing participants to follow horses and jockeys that may find their way in future for feature races.
- One race of significance is the Queensland Derby held at Eagle Farm each year, which has provided Hong Kong Derby winners and placegetters including Werther (second in 2015), Eagle Way (first in 2016) and Senor Toba (second in 2021).
- An increase would provide wagering opportunities on races which are not currently available to Hong Kong residents through the legalized wagering operators which provides increased integrity to the industry overall with such wagering operators being required to provide information in any Steward's on betting on all events.
- Simulcast of Brisbane meetings may also provide the opportunity for Hong Kong jockeys to ride at Brisbane meetings which would be a tremendous drawcard for our racing fan base, particularly if Zac Purton was return to where he claimed his champion apprentice title in the season of 2002/03.
- Simulcasting of Brisbane race meetings would be mutually beneficial to both jurisdictions for promotion of travel and attendance.
- As the Equestrian host for the 2008 Beijing Olympics, a relationship between both cities forged through racing would be of great benefit in the lead up to the 2032 Olympic Games for Brisbane and to the generation of aspiring athletes from Hong Kong.

In summary, the Brisbane Racing Club believes if the extension of non-local horse racing simulcast was increased from nine to twelve races (when our Group One meetings in May and June are held alongside northern hemisphere Group One meetings), it would provide a truly global offering for Hong Kong racing fans and the world pool customers. One opportunity across both hemispheres would be a combination of races from the Epsom Derby and Queensland Derby meetings on June 1 2024, which are of great significance as a prelude to the Hong Kong Derby the following March.

In addition, an increase of simulcast races from 10 to 25 would provide great opportunity for when Australian Group One races are held alongside local HKJC Saturday meetings.



Tony Partridge
Chief Executive Officer



Neville Bell OAM
Chairman

EAGLE FARM & DOOMBEN

BRISBANE RACING CLUB LIMITED

The Secretariat
Betting and Lotteries Commission
13/F, West Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong.

Via email: ha2@hyab.gov.hk

Dear Secretariat

I am writing to support of The Hong Kong Jockey Club's proposals to increase the number of simulcast races from 10 to 25 and lifting the maximum number of non-local races per simulcast day from 9 to 12.

By way of background, Tabcorp is the largest funder of the Australian Racing Industry through wagering by Australian customers via the TAB brand.

TAB customers have enjoyed wagering on HKJC events for almost two decades and is the only major wagering operator in Australia to have a contract with the HKJC to wager on **all** HK racing and other World Pool events.

Earlier this year, Tabcorp and the HKJC partnered to launch the first World Pool on Australian racing and secondly, linked all Australian totes operated by Tabcorp to co-mingle into The HKJC tote pools on HK racing.

Under the current simulcast reciprocal arrangements, there has been an imbalance between the low number of Australian racing events covered by the HKJC versus what TAB provides to its customers for coverage of HK racing.

At the same time, we are concerned with the level of illegal betting on Australian racing events not covered by the HKJC knowing that HK customers are engaged and follow the high quality of racing from Australia not covered by the HKJC.

These proposals, if approved, will make an inroad in addressing the reciprocity imbalance, aid in reducing the level of illegal betting and thirdly, provide additional funding to the racing industry.

For these reasons, we fully support the proposals and look forward to strengthening our great relationship with the HKJC.

Regards



Paul Carew
Chief Operating Officer
Tabcorp

The Secretariat
Betting and Lotteries Commission
13/F, West Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong.

Via email: ha2@hyab.gov.hk

Dear Secretariat

I am writing to support of The Hong Kong Jockey Club's proposals to increase the number of simulcast races from 10 to 25 and lifting the maximum number of non-local races per simulcast day from 9 to 12.

SKY Racing Australia (SKY) manages the broadcast and distribution of HK racing to customers in Australia as well as the international export media rights for the majority of racetracks in Australia and New Zealand. SKY's parent company is Tabcorp.

SKY has worked closely with the HKJC for almost two decades and now broadcasts HK racing across four channels including SKY 1, SKY 2, SKY Thoroughbred Central and SKY Racing Active. It also provides HK coverage to the TAB in Australia for display across all distribution channels including outlets, pubs, clubs, track and digital.

Conversely, SKY also manages the export of Australian Racing to HK, providing the broadcast for simulcast racing in HK. At the present time, there is an imbalance in simulcast reciprocity.

Simulcast reciprocity is a system whereby horse racing operators share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations via legalized wagering channels.

Simulcast reciprocity agreements can benefit operators in several ways. It can help to build relationships between tracks and foster cooperation within the racing industry, and to reduce the costs associated with producing and broadcasting live racing signals, as operators can share the costs of production and distribution.

Approval of both proposals would enhance the relationship between SKY and the HKJC and enable customers in HK to enjoy seeing more quality racing from Australia and reduce the level of illegal betting.

As such, we totally support both proposals.

Regards

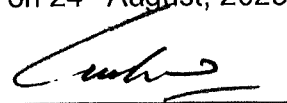


Adam Brownlee
General Manager
SKY Racing & International Media

Since its establishment in 1950, the Aberdeen Kai-fong Welfare Association Limited (AKA) is a non-profit organisation that actively provides integrated services, striving for excellence and developing a sustainable society. Throughout the years, The Hong Kong Jockey Club (HKJC) is an important stakeholder of AKA and has been facilitating the capacity building of AKA through the charitable donations of its Charities Trust, which benefits AKA services and enables the launching of new initiatives by AKA. In addition, HKJC's generous funding supports AKA to serve the disadvantaged people and improve the quality of life of many service recipients. Moreover, HKJC has funded the implementation of various modernisation works and projects that have upgraded the facilities of AKA. After consideration of HKJC's proposal, AKA supports the proposal with the following justifications: 1) According to the studies conducted by HKJC, we believe that if the Government approves the increase in the simulcast races and simulcast days, it can divert illegal betting demand to legal channel through increasing accessibility of legal betting. In addition, with the increase in legal betting channels, the public motivation to illegal betting shall also be decreased; 2) We believe that in view of numerous gambling counselling hotlines such as Ping Wo Fund hotline and hotlines by other NGOs as well as several counselling and treatment centres are in place, such as the Caritas Addicted Gamblers Counselling Centre and Tung Wah Group of Hospitals Even Centre, which offer gambling counselling by trained professionals and public education to the community and youths on prevention of gambling disorder, the proposal will unlikely lead to any significant increase in public participation in betting nor increase the risk of excessive betting, and have minimal impact on the youths; and 3) The proposal will generate additional revenue and sustain HKJC's contributions to social betterment, including returning its total betting revenue to the community through payment of betting duties and profits tax to the Government, donations to the community, contributions to the Government's Lotteries Fund and creation of job opportunities.

Prepared on 24th August, 2023

Authorized by



WAN Ngai-teck, Alice
Chief Executive
AKA

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把(i) 每年同步聯播賽事由10場增加至25場；及(ii) 每個同步聯播日的非本地賽事場數上限由九場增至12場，本人／機構意見如下：

本會同意及全力支持以上兩項建議，原因如下，

- 賽馬會慈善基金作為社會服務界的主要捐贈者有必要維持及增加穩定的收入來源，以應付香港在面對急速變化下社會服務的需要。
- 以本會為例，由馬會慈善基金支持的項目包括男士精神健康計劃、睡眠健康計劃、懷孕婦女支援計劃、社區精神健康支援計劃等，此類項目均為創新及填補政府不足的服務，正正需要基金的支持，並配合實證研究於日後推介予政府，使之普及化，並有更佳位向布可以得益。
- 以上兩項建議相信能增加基金收入，使業界能夠約五倍適用的社會服務同時亦能為政府增加稅收。

姓名

: 程志剛

所屬機構（如適用）

: 香港心理衛生會



日期

: 20-1-2023

簽署

: 程志剛

註：請細閱後頁個人資料收集聲明。

本函檔號：CSW/F/0829/2023

博彩及獎券事務委員會
葉振都主席

葉主席

政府批准香港賽馬會（馬會）舉辦規範化的賽馬活動，用以協助打擊非法賭博，而馬會從營運所得的盈餘也有效地用於推動慈善工作，支援有需要的弱勢社群。數十年來，香港賽馬會慈善信託基金（基金）審批眾多非政府機構申請資助的計劃書，提供資源推行創新服務，協助匱乏人士和家庭解決生活困境，香港明愛亦成功向基金申請贊助，開展未獲政府資助的服務，支援社會上有急切需要的社群。

近年，基金主動積極地發掘隱藏於社會的問題和被受忽略的社群，聯繫不同的非政府機構、社區團體及大專院校，合作推行多項前瞻性的先導計劃，目的是提供「及早預防」和「適時介入」的服務，以免社會問題日趨惡化或被受忽略的人士和家庭長期陷於困境之中。與此同時，基金更會資助個別機構之創新性計劃，以求滿足各項新服務需要，這些計劃包括為居於劏房戶人士而設的「三房兩廳開檯食飯」社醫共生計劃、服務專注力不足或過度活躍症學生的「喜躍悅動計劃」、支援失胎父母的「小足·福」失胎支援計劃、支援護老者的服務計劃、服務中、小學及社區人士的「源·點」家校心靈支援服務。香港明愛積極參與上述計劃，與各持份者協作，並透過結合實務經驗與大學的學術研究，建立嶄新的服務模式，共同解決社會的問題和回應社會需要。

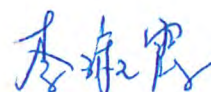
除了上述計劃外，於疫情期間，基金更額外撥款資助眾多非政府機構添置及改善設施，明愛康復服務及安老服務轄下之日間服務中心均為當中的受惠單位，得到額外資源以提升各項防感染措施、購置器材及電腦輔助設備以加強疫情下網上、視像活動的推行，令眾多留於家內，不能外出的服務使用者直接得益。

香港明愛雖然是基金的其中一個受惠團體，但這並不影響機構對賭博的立場。縱然有許多香港市民認為賽馬是一種體育、康樂和社交活動，但我們不能否認亦有不少人視賽馬為賭博。香港明愛不贊成賭博，亦不提倡任何推廣賭博的活動。除了「賽馬」之外，市民亦有以其他方式參與賭博：如足球博彩又或網上海外投注。故此，我們不能忽視賭博造成的不良影響。在此促請基金關注賭博為社會帶來的負面後果，並透過資助更多服務計劃，減低賭博帶來的危害和不良影響。



最後，期望基金能夠繼續對香港社會的長遠發展作出承擔，發揮正能量和關愛精神，支持更多服務計劃，讓最末後無靠、最卑微無助及最失落無救的弱勢社群得到適切的服務，舒解生活困境，開展豐盛人生。

社會工作服務部長



李淑霞女士 謹啟

二零二三年八月二十四日

Annex II

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

As one of the benefiting organizations funded by the HKJC we support their proposal to increase the number of simulcast races from 10 to 25 and ~~the~~ increase the maximum number of non-local races per one simulcast day from 9 to 12. We believe that by doing so more NGOs like us and our target vulnerable clients can be benefited from the proposals.

Name

: TSANG CHIN KWOK

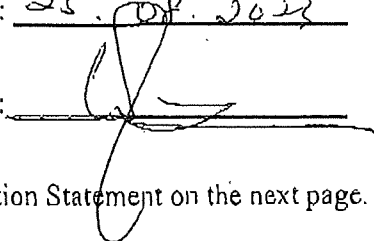
Representing organisation (if applicable)

: The Samaritan Befrienders Hong Kong

Date

: 25.08.2023

Signature

: 

Note: Please read the Personal Data Collection Statement on the next page.



La Directrice Générale

SECRETARIAT TO THE BETTING AND
LOTTERIES COMMISSION
13/F, WEST WING,
CENTRAL GOVERNMENT OFFICES,
2 TIM MEI AVENUE,
TAMAR, HONG KONG

Paris, 24 August 2023

By email: ha2@hyab.gov.hk

The Hong Kong Jockey Club 's Proposals of Additional Horse Race Betting Activities

Dear Members of the Betting and Lotteries Commission,

I'm writing on behalf of PMU to strongly endorse the Hong Kong Jockey Club's initiative to enhance its international racing offerings through an increased number of simulcast races. Our longstanding partnership with the esteemed Hong Kong Jockey Club since 2003 has been a source of great pride, reflecting the commitment to elevating global horse racing prominence.

As fervent advocates of industry excellence, we enthusiastically rally behind the Hong Kong Jockey Club's proposal to intensify simulcast races on local HK race days, expanding from 10 to 25, and to elevate the simulcast races on simulcast days from 9 to 12. This strategic approach aligns seamlessly with PMU's legacy, enhancing the wagering experience with a diverse array of races from various global jurisdictions, complementing our French events.

In cooperation with the Hong Kong Jockey Club, we have forged a synergistic strategy over the years, propelling French, and Hong Kong racing onto a heightened global stage with commingling on our respective pools. Simulcast reciprocity enables operators to offer a wider wagering variety, attracting new customers and fostering industry cooperation, while also reducing production costs and enhancing the overall vitality of the racing sector. The growing international flavour in horse racing underscores the importance of expanding simulcast races, allowing enthusiasts to engage more deeply with the sport and make informed betting choices. Moreover, this strategic expansion holds economic benefits for the racing sector, charities, and Hong Kong authorities, similar to the French horse racing sector.

The Hong Kong Jockey Club's exemplary reciprocal agreements with legalized wagering operators set high industry standards, elevating the racing program, equine welfare, integrity and contributing to the responsible industry expansion. These agreements also uphold stringent standards such as customer care, addiction prevention and compliance. Our endorsement of the Hong Kong Jockey Club's application is unwavering and unequivocal.

We are dedicated to elevating the Hong Kong Jockey Club's aspirations and fully support this application.

Sincerely yours,

A handwritten signature in black ink, consisting of a stylized, cursive script that is difficult to decipher but appears to be the name of the signatory.

Emmanuelle MALECAZE-DOUBLET
CEO PMU

25 August 2023

Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.,
Chairman,
Betting and Lotteries Commission,
c/o Secretariat to the Betting and Lotteries Commission,
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

By email (ha2@hyab.gov.hk)

Dear Mr Yip,

**The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities
Views from Business Environment Council Limited**

In response to the Hong Kong Jockey Club's proposals of increasing the maximum number of simulcast races per year and increasing the maximum number of non-local horse races per simulcast day, Business Environment Council Limited ("BEC") is writing to register our support.

With minimal impact on the youth and are unlikely to significantly increase public participation in betting, the proposals will generate additional betting duty that will be channelled to support charitable undertakings. As a beneficiary of the HKJC Charities Trust ("HKJCCT") with previous and ongoing projects on waste reduction, energy efficiency improvement and decarbonisation, BEC explicitly suggests more of the proceeds from the increased revenues due to the proposals should go towards supporting and expanding the sustainability / environmental works of HKJCCT, which will without doubt contribute to Hong Kong's carbon neutrality goal and other environmental targets, as well as enhancing the well-being of the Hong Kong community.

Yours sincerely,



Simon K W Ng
Chief Executive Officer
Business Environment Council Limited

Annex II

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

Horse Racing is one of the most popular sport items in Hong Kong. As a representative of a national sport association, supporting Hong Kong sport development is our responsibility. For increasing the maximum number of simulcast races from 10 to 25, it is an opportunity to promote some prestigious and popular non-local horse races to the public. The sport development in Hong Kong keeps growing, more athlete qualified to international matches. Simulcast international races is a way to increase the public supportive by watching the performance of our athlete in the international matches thought local legal channel. The schedule of international matches in different country may be held in the same day with different time, increase the maximum number of non-local races per one simulcast day can cover those matchdays. Public can increase the supportive for both horses and jockeys who have the matches in the same day by broadcasting both matches in the legal channel.

Name : Marina Tsui
Representing organisation (if applicable) : Volleyball Association of Hong Kong, China

Date : 25 August 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.

香港賽馬會增加賽馬博彩活動的建議

對於馬會建議把 (i) 每年同步聯播賽事由 10 場增加至 25 場; 及 (ii) 每個同步聯播日的非本地賽事場數由 9 場增至 12 場, 本人/機構意見如下:

香港賽馬會一直貫徹「取諸社會、用諸社會」的理念, 將由賽馬、有節制體育博彩及獎券的收入貢獻於慈善及社會, 當中, 為社會認識和認同的香港賽馬會慈善信託基金(下稱「基金」), 馬會每年將約百分之九十的稅後經營盈餘撥捐作基金, 於慈善福利醫療社會事務及社區發展上擔當十分重要角色。

新型冠狀病毒病肆虐期間, 馬會因疫情影響了不少賽馬及獎券等活動, 令其經營盈餘大減, 惟馬會仍然在疫情下, 撥捐了逾 20 億款項以支持抗疫工作, 例如成立「賽馬會新冠肺炎緊急援助基金」, 透過非牟利機構支援受疫情影響的市民、又為超過十萬名基層學生提供免費流動上網數據以支援網上學習; 向行動不便的長者、殘疾人士及低收入家庭派發關懷包; 為缺乏溫飽人士提供食物援助; 並為疫情下為首次求職的大專畢業生提供人才配對及發展項目。並捐贈支援「安心出行」智能手機連流動通訊服務預約 20,000 名基層長者。又聯繫非政府組織推出「賽馬會長新冠復康計劃」, 為 2019 冠狀病毒病康復者, 特別是弱勢社群, 提供全面復康支援。馬會在疫情期間收入減少, 但支援服務捐助有增無減。在 2021/22 年度, 馬會透過稅款及慈善捐款將 338 億港元的博彩及獎券收入直接回饋香港。

現時疫情穩定, 馬會為慈善工作的步伐沒有停下, 在基層醫療、減貧、運動推廣、學生交流等政府政策上, 不遺餘力, 並捐款推展多項嶄新的試驗計劃, 惠澤社群。

馬會一直有完善節制博彩措施, 防止增加過度博彩的風險。樂善堂支持馬會建議, 有助香港社會及慈善持續發展。

姓名: 劉愛詩 總幹事 MH

所屬機構: 九龍樂善堂

日期: 2023 年 8 月 25 日

簽署:



Secretariat to the Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tarnar
Hong Kong

By email: ha2@hyab.gov.hk

Dear Madam/Sir,

The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

I am writing to you as Managing Director of German Tote. German Tote is the betting company of German horse racing - shareholders of the company are the German non-profit horse racing clubs and the French PMU. The sole objective of the company is to support horse racing and horse breeding financially and in public perception. German Tote has been a partner of, among others, the Hong Kong Jockey Club for many years. German Tote was the first holder of a simulcast and comingling license in Germany, granted in 2015.

We strongly support the Hong Kong Jockey Club's request to increase the number of simulcast races from 10 to 25 and an increase in the number of races per simulcast race day from 9 to 12.

Like all major sports, horse racing is becoming more international every year. Racing fans all over the world have an increased interest in watching the top horses from their country compete in other countries, but also in general the top horses and races in other countries. This increased international interest is confirmed by the great success of the Hong Kong International Races.

Increasing the number of simulcast races will meet a real demand and allow racing fans to better follow the sport they love and make more informed betting decisions.

Expanding the range of simulcast races is of great importance to horseracing. It enables us to offer punters a much expanded betting offer with a greater number of races and significantly higher and more extensive betting pools. This brings a significant increase in revenue for the horse racing operators and also the possibility of gaining new betting customers through the aforementioned measures.

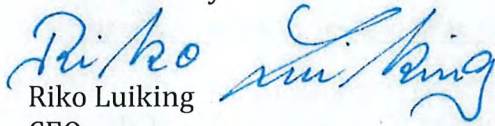
The simulcast agreements concluded on a reciprocal basis make a decisive contribution to expanding relations between the racecourses and promoting cooperation within the racecourses in different countries, here in particular between the Hong Kong Jockey Club and German racing clubs. The first cooperations last year and this year were successful.

The betting operators involved are legalised and meet high standards of customer care, addiction prevention, youth protection and regulatory compliance, thereby reducing the risk of social and personal problems and criminal activity.

In addition, legalised and accredited betting operators contribute to the improvement of the racing programme, horse welfare and integrity, strengthening the health and sustainability of racing and betting in their countries. If betting takes place with unregulated or illegal operators, it is very likely that racing will not benefit at all and addiction prevention issues will not be taken into account.

We believe that both the benefits to racing fans in Hong Kong and the economic benefits to racing and the state will be much greater both in Hong Kong and in the racing countries where the betting operators are based. Potential harmful social consequences can be better controlled by providing a well-regulated and legalised channel such as the HKJC. For this reason, we fully support the motion. Yours sincerely

Yours Sincerely


Riko Luiking
CEO



25 August 2023

FAO Secretariat to the Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

By email only: ha2@hyab.gov.hk

Dear Sirs,

Hong Kong Jockey Club's ("HKJC") Proposals of Additional Horse Race Betting Activities

I am writing on behalf of the British Horseracing Authority ("**BHA**") in response to your notice inviting views on the HKJC's proposals of increasing the maximum number of simulcast races per year and increasing the maximum number of non-local horse races per simulcast day (the "**Proposals**").

The BHA is responsible for the governance, administration and regulation of horseracing and the wider horseracing industry in Great Britain. The BHA leads on the development and growth of British racing and prioritises the health and welfare of the sport's human and equine participants. The BHA represents British racing on the international stage and is an active member of both the International Federation of Horseracing Authorities ("**IFHA**") and the European & Mediterranean Horseracing Federation.

The BHA invests heavily in its world-class regulatory functions to ensure that the sport is safe, clean, and fair giving investors and customers in Britain and Hong Kong confidence in our integrity and welfare standards. British racing, including the BHA, its licensed racecourses, participants, and media rights partners, share a close and collaborative relationship with the HKJC. In 2019, the first World Pool international commingling raceday took place in Britain and since then the expansion of simulcasting and, in turn, the World Pool meetings has afforded us with the opportunity to showcase our prestigious, high-quality racing product to horseracing fans in Hong Kong.

Simulcasting of international races plays an important role in driving engagement and investment in the sport globally and generates a significant revenue stream to governments, the HKJC and its international partners. The continued globalisation of the sport is essential to ensure there is appropriate international recognition and participation of both our human and equine athletes, whilst enabling racing fans to wager on races from different locations via legalised channels. The BHA is working alongside the HKJC, and other members of the IFHA, to ensure there is increased international harmonisation on key Rules of Racing to maintain a global, professional, and consistent approach to raceday regulation.

We recognise and share the HKJC's concerns around the continued proliferation of illegal betting threats and continue to collaborate with the HKJC, through our membership on the Asian Racing Federation Council on Anti-Illegal Betting & Related Financial Crime, to foster and enhance international cooperation to better combat these. The Proposals can help the HKJC, in partnership with other jurisdictions and regulators, to further mitigate such risks to the integrity of the sport by stabilising betting turnover in the legal market, contribute to increased government betting duty and promote sustainable development of a world-class racing programme.

The BHA wishes to express its support for the Proposals, and we are optimistic that through increased simulcasting of international races in Hong Kong, and British racing's continuing investment in its world class racing and regulatory functions, our commercial and regulatory partnerships with the HKJC will continue to develop and flourish.

We would welcome the opportunity to answer any queries in relation to this submission.

Yours faithfully,

Julie Harrington.

Julie Harrington
Chief Executive

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, our Organisation's comments are as follows:

We are the Music Children Foundation, a grantee of the Hong Kong Jockey Club (HKJC), which positively impacts the lives of thousands of children from underprivileged families by providing them with free-of-charge music training. We are writing to express our support for HKJC's proposals, which we believe will benefit charitable causes and the community.

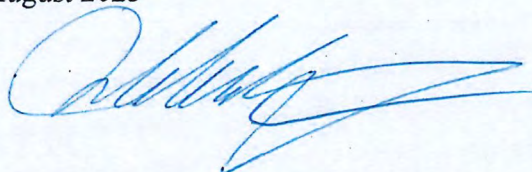
We realise that there are concerns about the risk of excessive betting. But we also know that the number of HK people betting illegally on non-local horse racing has increased by around 3.5 times over the past eight years. Opening wider channels for non-local racing managed by HKJC will undoubtedly bring more positives through a legal option to bettors with good governance and regulations, including policies against underage betting, rather than negatives like increasing the risk of excessive betting. We also believe that a better-regulated legal option will help fence off a wide range of highly addictive bet types and products, helping to avoid serious personal, family and social problems.

HKJC has a long-standing tradition and brilliant record of supporting philanthropic initiatives; the proposed increase in simulcast races would provide additional resources to support these worthy causes through its collaborations with various charitable organisations supporting causes such as children and youth development, sports, art and culture, positive ageing and elderly care, talent and sector development, poverty alleviation, etc. On the other hand, the government can also benefit from the increased revenue through taxes and other forms of financial contribution, enabling it to fund essential projects and services that benefit the wider community.

Name : Leung Wing Hang, Michael
Representing organisation : Music Children Foundation Limited

Date : 25 August 2023

Signature :



Note: Please read the Personal Data Collection Statement on the next page.



Mr YIP Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman
Betting and Lotteries Commission
Home Affairs Bureau
Hong Kong

25 August 2023

Re: Proposals to increase the maximum number of simulcast races per racing season and increase the maximum number of overseas horse races per simulcast day

Dear Mr Yip,

It has come to the attention of the World Lottery Association (WLA) that the Betting and Lotteries Commission is considering an application from the Hong Kong Jockey Club (HKJC), a WLA Member, to increase the maximum number of simulcast races per racing season and increase the maximum number of overseas horse races per simulcast day.

As a means of assisting the Commission in its assessment, we write to underscore the importance of the proposals with regard to combatting illegal betting and the potentially negative consequences that may result from such activities in Hong Kong and its diverse communities.

The World Lottery Association (WLA) is an international, member-based organization of state-authorized lotteries and suppliers to the global lottery industry. We strive to meet the highest standards and ethics for our industry, as we help our members to reach their goals of raising money for good causes in a responsible way.

The state-authorized lottery and betting sector is an essential driver of economic good in communities around the globe. WLA member lotteries support good causes in their respective jurisdictions through the sale of responsible, ethical, and entertaining gaming products. In 2022, WLA Member Lotteries generated revenues of USD 283 billion and returned USD 93.2 billion to good causes.

We work continually to gain a better understanding of the size and complex nature of the illegal betting market, and to maintain the integrity of betting on sport and horse racing, so that we may better assist our members and the greater sports and horse racing ecosystems.



To this end, our Illegal Lotteries and Betting Committee has developed a database that provides country fact sheets with an overview of the legislative, judicial and commercial situation regarding of known illegal lottery and betting operations, for over 30 countries. We also provide trainings and seminars, with diverse global partners, pooling expertise on this topic to raise awareness of the different issues that arise from illegal betting.

Indeed, WLA collaborates closely with different stakeholders around the world who are united in the fight against illegal betting and maintaining the integrity in sport and horse racing.

We also work extensively with the United Lotteries for Integrity in Sport (ULIS), which unites legal lotteries and sports betting operators, sports organizations, law enforcement agencies and sports monitoring bodies, who share intelligence and expertise, as well as raise awareness of the issues illegal betting and match fixing, with the ultimate goal of maintaining integrity in sport.

In recent years, online sports betting has flourished around the world, as more jurisdictions legalize online betting, and advances in technology enable the rapid growth of online betting products and services. Unfortunately, the global illegal sports betting industry has also boomed, facilitating access to, and payment for betting products and services that may be unavailable through legal channels.

For these reasons, the WLA strongly believes that as horse racing continues to grow, it is paramount to enable customers in Hong Kong, to be able to watch and/or bet on different races using through increased simulcast arrangements with legal betting operators, as per the proposals of the HKJC.

We believe this initiative would contribute towards levelling the playing field between legal and illegal betting operators, and help to reduce the loss of fans and customers to illegal operators. Moreover, it would be another positive step in the global fight against illegal betting, which may also inspire other authorities to follow suit.

In closing, we hope that the HKJC's proposal will result in a positive outcome and remain at your disposal.

Yours sincerely,

A handwritten signature in blue ink, which appears to read 'Luca Esposito'.

Luca Esposito
WLA, Executive Director



致：博彩及獎券事務委員會

關於馬會增加轉播海外賽事場次建議

本會支持香港賽馬會增加賽馬博彩活動的建議：

1. 非法賭博的禍害影響深遠，並引致多種嚴重的個人、家庭及社會問題。本會相信馬會的建議可以有效地令馬迷轉投合法投注渠道，將有助進一步加強打擊非法賽馬博彩。
2. 馬會作為本港重要的慈善機構，以其獨特的綜合營運模式，透過賽馬及博彩業務所得收益，為社會帶來稅收及慈善捐款。本會認為是次建議可以增加馬會的收入，創造更多就業機會，亦可為社會帶來更多稅收及慈善貢獻，有助支援社區發展，直接回饋香港。
3. 本會希望馬會日後可以繼續資助更多社區及慈善活動，幫助社會上有需要人士，惠澤社群。

但同時，本會亦認為馬會應持續推行有節制博彩措施，加強宣傳和教育。

如有垂詢，請與葵涌動力秘書處陳先生聯絡(電話：5399-7088)。

葵涌動力秘書處

2023年8月22日

致：博彩及獎券事務委員會

有關：馬會增加轉播海外賽事場次建議

就馬會向政府建議把每年同步聯播賽事的上限由 10 場增加至 25 場；並把每個同步聯播日的非本地賽事場數上限由 9 場增至 12 場。

本會表示支持馬會增加轉播境外賽馬博彩活動，原因如下：

- 1) 馬會的業務一直為社會帶來龐大的博彩稅收及慈善捐款，透過對慈善機構和社區的捐贈，致力服務社會上有需要的人。馬會增加同步聯播賽事的場數上限有助增加其收入，促進世界及本地賽馬事業發展之餘，亦使馬會能夠繼續為香港社會作出貢獻。
- 2) 香港賽馬會慈善信託基金是全球十大慈善捐助機構之一，致力與政府、非政府組織及社區機構攜手改善港人生活質素，對民生及社會有全面的貢獻，當中對支持青少年及教育方面的工作更是不遺餘力。
- 3) 由於參與賽馬博彩的馬迷需要具備一定程度的投注知識水平，而且數據指出青少年對海外賽馬的參與度低。本會相信馬會的建議對導致公眾參與博彩以及未成年人賭博的情況甚微，因此並不會增加過度博彩的風險。

另外，本會相信馬會的建議可以有效地令馬迷轉投合法投注渠道，將有助進一步加強打擊非法賽馬博彩。

但與此同時，本會亦認為馬會應持續推行有節制博彩措施，加強宣傳和教育。

如有垂詢，請與香港青年學生動力基金秘書處譚先生聯絡



香港青年學生動力基金秘書處

2023 年 8 月 24 日



HAMBURGER RENN-CLUB e.V.

Secretariat to the Betting and
Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong
By email: ha2@hyab.gov.hk

Hamburg, 27. August 2023

Dear Sirs,

on July 2nd this year we had the honor to present the German Derby 2023 in Hong Kong. It was the first German race for which bets were combined in the 'World Pool' under the supervision of the Hong Kong Jockey Club. Not only due to the diligent planning and execution by both sides we were extremely pleased to see that no issues were observed, neither on the sportive, nor on the technical side.

The German Derby, being the most important race and absolute highlight of the German racing calendar, has been run in Hamburg since 1869, this year for the 154th time. In recent years we have always been able to present the maximum number of twenty starters in this special race.

We fully and without reservation support the Hong Kong Jockey Club's request to increase the number of simulcast races on local Hong Kong race days from the previous 10 to 25 and to increase the number of simulcast races on these days to 9-12 races.

This extended cooperation is of great importance for gallop racing in Germany and creates invaluable opportunities allowing us to offer customers expanded betting offers with an expanded number of races and significantly higher and more extensive betting pools. This not only brings a significant increase in revenue for the horse racing industry, but also the opportunity to retain existing and attract new customers through the aforementioned measures.

The simulcast agreements also plays a crucial role in strengthening the relationship between the racecourses and promoting cross-border cooperation amongst racecourses in different countries, here in particular between the Hong Kong Jockey Club and German racing clubs. The first collaborations last year and this year have already shown to be very successful.



The Hamburg Racing Club handles all its betting activities exclusively on the basis of government permits. The same applies to all other German racecourses. Thus, the Hong Kong Jockey Club will be contracting exclusively with state-approved betting providers in the context of these simulcasting agreements. Accordingly, full compliance with all applicable regulations is monitored by the public institutions and national supervisory authorities.

The Hamburg Racing Club is not only licensed to accept horse bets for races in Hamburg, but has also been granted an exclusive governmental approval to accept and forward bets to foreign totalizators/ pools for the entire territory of the Federal Republic of Germany. This authorization has also been expressly granted for the forwarding of bets from Germany to the Hong Kong Jockey Club betting pool.

An increase in the number of simulcast races would bring significant benefits to racing in the international arena for customers and the organizers of horse races. We therefore fully support this request without any reservations.

Yours sincerely,


Hans L. Matthiessen

President

Hamburger Renn-Club e.V.

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

1. Legal entertainment as a potential channel to curb the mental health risks associated with debts and addiction common in illegal betting. Since the pandemic, the Hong Kong population has experienced a significant reduction in stress outlet and healthy leisure activities; as society recovers, renewed efforts in addressing entertainment needs are welcomed. These efforts should be monitored, to ensure that the new entertainment opportunities are indeed addressing otherwise unfulfilled needs (e.g., diverting citizens from illegal channels), with effective promotion of responsible gambling.
2. Ensuring population mental health benefits from increased gambling income. On top of the economic and financial implications listed, donations of the HKJC Charities Trust have been a major resource for mental health promotion, including the JC JoyAge project, which supports older people at risk of depression territory-wide. Given the link between gambling and mental health problems, the Trust should make mental health a priority area of donation, to offset any risks the proposal may introduce to society.

Name : Gloria Wong

Representing organisation (if applicable) : JC JoyAge, HKU

Date : 28 August 2023

Signature : 

Note: Please read the Personal Data Collection Statement on the next page.



August 27, 2023

Via Email to ha2@hyab.gov.hk

Secretariat to the Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong

Re: The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

I am writing on behalf of Monarch Content Management, LLC, which is the simulcast representative for fourteen (14) racetracks as well as several online wagering platforms in the United States. Monarch is a division of 1/ST Racing, one of the leading horse racing operators in the United States. Our member racetracks include the prestigious racetracks Gulfstream Park (home of the Pegasus World Cup), Del Mar, Santa Anita Park and Pimlico Racecourse (home of the Preakness Stakes, the second jewel of the American Triple Crown).

In our representation of our member racetracks, Monarch imports and exports simulcast signals with other racetracks throughout the world, including Europe, South America, Africa, Asia, and Australia. Monarch has imported the simulcast signal of the Hong Kong Jockey Club into the United States since 2014, and we appreciate the opportunity to offer HKJC's premier racing to our wagering customers.

Regarding HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, Monarch's comments are as follows:

- Simulcast reciprocity is a system that allows racetracks to share their live racing signals with each other, enabling racing fans to enjoy and wager on races from different locations through legal wagering channels.
- Reciprocity allows operators to offer a more comprehensive wagering menu to their wagering customers who are able to access a wider variety of races and betting pools. It also provides a way for horse racing operators to increase their revenue by attracting new customers.

- Simulcast reciprocity agreements can benefit operators in several ways. It can help to build relationships between tracks and foster cooperation within the racing industry, and to reduce the costs associated with producing and broadcasting live racing signals, as operators can share the costs of production and distribution.
- Increasing the number of races simulcast by HKJC will enable HKJC to increase its premier position in international racing by forging stronger ties with the international racing community.

Should the number of simulcast races be increased, Monarch would be very interested in working with HKJC to offer the Pegasus World Cup and Preakness Stakes, which are both major international races, to HKJC's wagering customers.

Very truly yours,



Jack A. Jeziorski
Executive Vice President



Moonee Valley Racing Club

28 August, 2023

The Secretariat of the Betting and Lotteries Commission
13/F West Wing, Central Government Offices
2 Tim Mei Avenue, Tamar, HONG KONG

By Email: ha2@hyab.gov.hk

To The Secretariat,

RE: The Hong Kong Jockey Club's Proposal of Additional Horse Race Betting Activities

On behalf of the Moonee Valley Racing Club (MVRC), I submit this Letter of Support in relation to the Hong Kong Jockey Club's proposal of additional Horse Race Betting Activities.

As the home of Australia's Best Race, the WS Cox Plate, the MVRC shares an established relationship with the HKJC. An alignment of world-class racing product and internationally acclaimed black-type races and global pathways reflects the complement that exists between the HKJC and the MVRC.

This year, champion Hong Kong galloper, Romantic Warrior (IRE) headlines the nominations for the 2023 Ladbrokes Cox Plate, commanding an exceptional cross-promotional opportunity for both jurisdictions in the midst of the Melbourne Spring Racing Carnival.

Simulcast reciprocity allows horse racing operators to share live racing signals; enabling racing fans to enjoy and wager on races from different jurisdictions via legalised channels. It also allows operators to offer a more comprehensive wagering menu to customers; giving them access to a variety of races and betting pools and providing a way for horse racing operators to increase their revenue by attracting new customers.

Further benefits associated with simulcast reciprocity agreements include enhancing relationships between tracks; fostering cooperation within the racing industry; along with reducing the costs associating with producing and broadcasting live racing (by way of sharing costs of production and distribution).

The MVRC hereby strongly supports the HKJC's additional Horse Race Betting Activity proposal with a view to growing both the customer wagering experience and jurisdictional relationships.

Yours sincerely

Charlotte Mills
Head of Racing





香港青少年服務處

HONG KONG CHILDREN & YOUTH SERVICES

香港添馬添美道 2 號政府總部西翼 13 樓
(博彩及獎券事務委員會秘書處收)

博彩及獎券事務委員會
葉振都主席：

對香港賽馬會建議增加賽馬博彩活動的意見書

香港青少年服務處為一間多元化社會服務機構，除恆常獲得社會福利署資助外，亦是香港賽馬會慈善信託基金受助機構之一，獲贊助推行多個具創意及前瞻性的慈善項目，讓兒童及家庭、青少年及長者受惠，得到更適切和及時的幫助，有助弱勢社群改善生活及促進身心健康發展。

對於是次香港賽馬會增加兩項聯播活動建議，本處表示不反對。

原因如下：

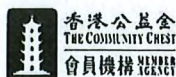
1. 由馬會同步聯播賽事，可轉移賽馬博彩需求至合法渠道，有助打擊非法博彩活動，從而減少大眾養成參與非法賭博的習慣及防止其引起之禍害。
2. 是次建議可增加政府稅收及慈善貢獻，有助解決社會需求。

若是次建議獲得批准，香港賽馬會收入隨之增加，希望馬會繼續肩負社會責任，透過香港賽馬會慈善信託基金，與政府及非政府組織合作，適時投放資源，開展更多福利項目，補足福利需要的縫隙，回應社會發展所需，造福社群。



李婉心 謹啟
香港青少年服務處 總幹事

二零二三年八月二十八日





C 康 mfort
C 明 re
C 會 ncern

康明會

THE COMFORT CARE CONCERN GROUP

Mr. Adrian Yip, B.B.S., M.H., J.P., Chairman,
Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong

28 August 2023

Re : Support for the HKJC's Initiative to Increase the Number of Racing Events

Dear Mr. Yip,

Thank you for your attention. I am writing to express my support for the Hong Kong Jockey Club's (HKJC) initiative to increase the number of racing events in Hong Kong. Our Group mainly deliver services to the terminally ill patients and the bereaved families. Specifically, I believe that expanding the simulcast races will not only boost business for the HKJC but also result in increased donations to the social sector and generate additional tax revenue for the Government.

First and foremost, it is important to acknowledge the significant role played by the HKJC Charities Trust's donations as a key source of funding for the social sector. The donation amount provided by the HKJCCT is substantial, and its impact is felt throughout various charitable organizations in Hong Kong. Moreover, the donations fill crucial gaps that may not be adequately covered by the Government or other funding sources, particularly in areas such as non-subsidized services and pilot service projects.

By increasing simulcast races, the HKJC will likely attract a larger audience and generate more business. This revenue will have a direct positive impact on the funds available for donation to the social sector. The additional donations will enable charitable organizations to continue their invaluable work and provide essential services to the community. Furthermore, the increase in business will also result in higher tax revenue for the government, contributing to the overall economic growth of Hong Kong.

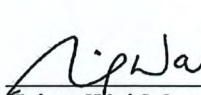


It is worth emphasizing that the HKJC has a strong track record of responsible gambling practices and maintaining the integrity of the sport. With appropriate measures in place to ensure the well-being of participants and promote responsible betting, the expansion of racing events can be managed in a responsible and sustainable manner.

In conclusion, I firmly believe that increasing the number of simulcast races is a beneficial step for the HKJC, the social sector, and the Government. The boost in business will lead to increased donations to the social sector, supporting vital services and projects that may otherwise face funding limitations. Additionally, the resulting tax revenue will contribute to the overall financial health of the Government. I fully support the HKJC's efforts in this regard and trust that they will continue to prioritize the welfare of the community and the integrity of the sport.

Thank you for your consideration and for supporting initiatives that strengthen the social fabric of Hong Kong.

Yours Sincerely,
The Comfort Care Concern Group



Tsing Wai Man
Director



August 28, 2023

Our Ref: LL1277

Secretariat to the Betting and Lotteries Commission
13/F, West Wing, Central Government Offices,
2 Tim Mei Avenue,
Tamar, Hong Kong

BY EMAIL ONLY: ha2@hyab.gov.hk

Dear Sir/Madam,

The Hong Kong Jockey Club's Proposals of Additional Horse Race Betting Activities

We refer to the submissions made to the Betting and Lotteries Commission (BLC) by the Hong Kong Jockey Club (HKJC) in regard to changes that the HKJC have proposed to permit betting on an increased number of non-local races falling on local race days (*simulcast races*) and betting on an increased number of simulcasts occasions on non-local race days (*simulcast days*).

We note that in summary, HKJC has submitted a proposal to:

- (i) increase the maximum number of simulcast races per year from 10 to 25; and
- (ii) increase the maximum number of non-local races per one simulcast day from nine to 12;

starting from racing season 2023/24.

('the Proposal')

We note that the BLC has invited members of the public to submit views on the Proposal.

Racing Queensland Board (RQ) as a Statutory Body formed by the Queensland State Government for the purpose of regulating and administering the commercial and operational aspects of all thoroughbred, greyhound and harness racing in Queensland.

RQ has a close relationship with the wagering operators who facilitate betting transactions on Queensland races.

RQ derives the majority of its operating revenue from a combination of:

- A. A flow through of 80% of the tax revenue derived by the State Government from its Point of Consumption / Betting Tax; and
- B. Race Field Fees that RQ charges wagering operators for the use of Queensland Race Information (ie. race calendar information, race fields, jockeys, etc).

RQ have developed a good relationship with the HKJC in regard to implementing a number of collaborations and industry initiatives which have benefited the racing industry, including:

- 1. Jockey exchange/jockey apprenticeship program;
- 2. Media rights deal to include international broadcast rights of Queensland race meetings to audiences in Hong Kong.



Jockey exchange/jockey apprenticeship program

RQ is the conduit between the HKJC and Queensland based Trainers, to facilitate the placement of two apprentice jockeys for international riding experience.

To expedite the process, the Trainers who were already approved sponsors of international jockeys, were invited to express their interest in participating in a pilot program as a precursor to potentially expand the program to further apprentice jockeys and trackwork riders.

The racing industry in Queensland is experiencing acute labour shortages for stablehands, trackwork riders, and jockeys, especially in regional areas.

RQ continues to focus on, and invest in, recruitment, training, and retention strategies to foster a wider and sustained pool of domestic workers for racing industry roles. However, despite our concerted efforts, demand continues to outweigh supply.

The HKJC pilot program affords RQ with an alternative and immediate solution to address the jockey shortages within Queensland, through the placement of apprentice jockeys with Qld based Trainers, especially in regional Queensland areas.

International broadcast rights

In 2020, RQ entered a long-term Media Rights partnership with Sky Racing through to 2030. This partnership grants all of RQ's International Media Rights to Sky Racing throughout this time. We understand that Sky Racing already provides simulcast coverage to HKJC through its Sky World service, and that if QLD races and/or meets were to be granted simulcast privileges, this would be facilitated through Sky Racing and the Sky World feed.

Queensland is home to iconic and globally recognised horse racing events such as the Magic Millions Carnival, Doomben Cup and the Stradbroke Handicap. RQ envisages that the HKJC would be eager to broadcast these Queensland race meetings as part of their proposed increased in the number of permitted broadcasts for non-local/international events.

Simulcast Reciprocity

RQ notes that Sky Racing currently broadcasts race meetings from HKJC controlled venues to Australian viewers and that Australian citizens can bet on Hong Kong race meetings through authorised wagering operators.

RQ is supportive of simulcast reciprocity. However as Sky Racing has the exclusive rights to broadcast Queensland race meetings to international audiences and it is Sky Racing who has a direct commercial relationship with HKJC in regard to simulcast reciprocity.

RQ are aware that Sky Racing will be providing their own letter of support for the HKJCs proposal.

Benefits of HKJC's proposal

RQ has considered HKJC's proposal in detail and we are fully supportive of HKJC's proposed changes to increase the number of simulcast days to maximise exposure of Queensland racing, facilitate additional legal wagering in Hong Kong and support further liquidity in the global totalizator pools, as further described below.

Increased exposure of Queensland Racing Product

RQ oversees the running of a number of high-profile race meetings throughout Queensland each year, conducted by the various Clubs licensed by RQ. Some of these major events include:

1. In 2024, The Star Gold Coast Magic Millions Carnival will include total prize money of \$14.25 million (AUD), highlighted by the \$3 million Magic Millions Two-Year-Old Classic and \$3 million Three-Year-Old Guineas. The Magic Millions Carnival is one of the most lucrative days on the Australian racing calendar and is the only raceday in the Southern Hemisphere to stage eight million-dollar plus races on the one card; and
2. The Queensland Racing Carnival features more than 50 Black Type races including eight Group 1s with more than \$25 million (AUD) in prize money. Marquee racedays include the \$3 million Stradbroke Handicap and the \$1 million Doomben Cup with seven million-dollar plus races throughout the Queensland Racing Carnival.



Increased legal wagering on international races and increased global totalizator pools.

As HKJC referred to in its submissions, if the BLC was to allow HKJC to broadcast and take bets on an increased number of international race meetings (including the above mentioned Queensland racing carnivals), it would facilitate legal betting on these international races and alleviate or reduce the risk of Hong Kong residences using illegal and unlicensed wagering operators to place bets on international race meetings, which also results in the loss of betting tax revenue to the HKSAR Government.

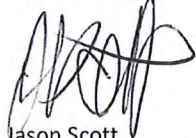
Reciprocal arrangements regarding increased broadcasting and betting on international races will also result in an increase in the value of tote and tote derivative betting pools, including the World Pool. An increase in the amount of prize money in these tote pools would also logically increase legal betting on these global totalizator pools.

The sustainability of racing in Hong Kong and other jurisdictions globally is highly dependent on a flourishing totalizator market. Further, the increased leakage of turnover from legitimate gambling channels to illegal bookmakers threatens returns to participants, industry and governments across the world. As such, RQ commends HKJC for recently increasing the eligible World Pool coverage in FY23. A subsequent increase in simulcast days is a logical next step to further strengthen the commingling opportunities that exist through that mechanism.

In summary, the proposed changes requested by the HKJC are in the best interests of all participants in the racing industry and should be accepted by the BLC on this basis.

Should you have any queries in relation to this letter please contact myself at

Yours sincerely,



Jason Scott
Chief Executive Officer



Submission of views on the Hong Kong Jockey Club's proposals of additional horse race betting activities

From: The Dragon Foundation

The Dragon Foundation is a non-profit, charitable organization that has been receiving financial support from various charitable organisations, including the Hong Kong Jockey Club (HKJC). We fully understand its operating business model.

The Hong Kong Jockey Club (HKJC) has been actively supporting local NGOs, social services, and academic institutions to promote better social welfare, and is committed to implementing innovative service models for disadvantaged groups and enhancing the effectiveness of its charity work.

Since the global Covid-19 health crisis, the HKJC has offered funds and emergency relief to help underprivileged to get through the critical times. HKJC has also made significant donations to support different cultural exchange initiatives such as the annual young Chinese leaders exchange programme (Dragon 100) and the upcoming Youth High-Speed Rail Trip of our Foundation.

It is undeniable that HKJC plays a significant role in local charity endeavours. Through various forms of donations and a philanthropical model that combines charity and community building, the HKJC creates economic and social value for the community, especially the younger generation, to build a better Hong Kong. HKJC's steady revenue is a cornerstone to ensure the charitable endeavours mentioned above are implemented with quality. We look forward to the continuation of this long-established and effective philanthropic contribution.

We support HKJC's proposed new arrangement of simulcast days to combat illegal gambling both online and offline, but also believe the government must conduct necessary regulations and interventions for safeguarding the physical and mental health of the public, particularly young people. Different sectors of the community should join hands and use programmes and activities to promote positive thinking and prevent young people from being tempted by illegal gambling.

At the same time, the authorities must provide comprehensive counselling support and treatment to persons with gambling disorders and those affected by them, in order to avoid further social issues.

Thank you for your kind attention.

Yours sincerely,

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

Gary Tang
Secretary General

28th August 2023

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

The Hong Kong Jockey Club (HKJC) has been a driving force in Hong Kong's society, committed to using its betting revenue for charitable donations and the betterment of the community. To maintain its competitiveness and maximize its potential for channelling revenue from the illegal market, the HKJC proposes to increase the maximum number of simulcast races and non-local horse races per one simulcast day. This move is not only logical but also essential for the HKJC to fulfill its philanthropic goals.

Firstly, increasing the maximum number of simulcast races and non-local horse races would enhance the HKJC's competitiveness. In today's digital age, where information and entertainment are readily available at one's fingertips, it is crucial for the HKJC to provide diverse and captivating betting options to attract customers. By offering a wider range of races to bet on, the HKJC can stay ahead of the illegal market that seeks to exploit the gambling desires of Hong Kong residents. This increased competitiveness would not only generate more revenue for charitable donations but also ensure that the HKJC remains at the forefront of legal betting.

Secondly, by increasing the number of simulcast races and non-local horse races, the HKJC can tap into new markets and encourage betting from a broader demographic. Some individuals might be more inclined to bet on races happening outside Hong Kong, either due to personal interests or connections to the locations involved. By offering a diverse range of races, the HKJC can cater to the preferences of these individuals, attracting new customers and expanding its reach. This will ultimately lead to higher betting revenue and, consequently, increased funds for charity.

Lastly, to counter the allure of the illegal market, the HKJC must continuously adapt and evolve. With technological advancements allowing for convenient access to illegal platforms, the HKJC needs to provide a compelling alternative that overcomes the convenience factor. Increasing the number of simulcast races and non-local horse races is a strategic move that provides variety, ensuring that bettors can find excitement and entertainment within the legal boundaries set by the HKJC. By capturing the attention of potential customers through legitimate means, the HKJC can direct revenue towards charitable initiatives and make a tangible and positive impact on society.

In conclusion, the HKJC's proposal to increase the maximum number of simulcast races and non-local horse races is essential for maintaining its competitiveness and maximizing its ability to channel revenue from the illegal market to charitable donations. By offering a wider range of betting options, attracting new customers from prestigious non-local races, and countering illegal platforms, the HKJC can continue to fulfill its philanthropic mission and make significant contributions to the betterment of Hong Kong's society.

Name : Nicole Wong

Representing organisation (if applicable) : World Wide Fund For Nature Hong Kong

Date : 28 August 2023

Signature : _____



Note: Please read the Personal Data Collection Statement on the next page.



Mr. YIP Chun-to, Adrian, B.B.S., M.H., J.P.
Chairman, Betting and Lotteries Commission
13/F, West Wing, Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

28 August 2023

Dear Mr. Yip,

The Hong Kong Jockey Club's Proposals of Additional Horse Betting Activities

I refer to your Notice dated 28 July 2023 regarding the captioned.

Please find below and enclosed our comments on HKJC's proposals in the submission form at Annex II.

The Hong Kong Jockey Club (HKJC) has been a driving force in Hong Kong's society, committed to using its betting revenue for charitable donations and the betterment of the community. To maintain its competitiveness and maximize its potential for channelling revenue from the illegal market, the HKJC proposes to increase the maximum number of simulcast races and non-local horse races per one simulcast day. This move is not only logical but also essential for the HKJC to fulfil its philanthropic goals.

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together possible™

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Lastly, to counter the allure of the illegal market, the HKJC must continuously adapt and evolve. With technological advancements allowing for convenient access to illegal platforms, the HKJC needs to provide a compelling alternative that overcomes the convenience factor. Increasing the number of simulcast races and non-local horse races is a strategic move that provides variety, ensuring that bettors can find excitement and entertainment within the legal boundaries set by the HKJC. By capturing the attention of potential customers through legitimate means, the HKJC can direct revenue towards charitable initiatives and make a tangible and positive impact on society.

In conclusion, the HKJC's proposal to increase the maximum number of simulcast races and non-local horse races is essential for maintaining its competitiveness and maximizing its ability to channel revenue from the illegal market to charitable donations. By offering a wider range of betting options, attracting new customers from prestigious non-local races, and countering illegal platforms, the HKJC can continue to fulfill its philanthropic mission and make significant contributions to the betterment of Hong Kong's society.

Should you have any questions, please contact Mr. Kenny Chan at _____ or by email at _____

Yours sincerely,



Nicole Wong
Chief Executive Officer
WWF-Hong Kong
Encl.

**The Hong Kong Jockey Club's Proposals of
Additional Horse Race Betting Activities**

On HKJC's proposals of (i) increasing the maximum number of simulcast races from 10 to 25 and (ii) increasing the maximum number of non-local races per one simulcast day from nine to 12, my / the Organisation's comments are as follows:

Kadoorie Farm and Botanic Garden and the Hong Kong Jockey Club have been long-term partners, collaborating on environmental matters of Hong Kong. KFBG is grateful for the support received from the HKJC over many years which has helped in safeguarding nature in Hong Kong. We hope that our partnership will thrive into the future and that the HKJC will continue to support KFBG's work.

We acknowledge the challenges that the HKJC is facing in a changing world, where technology is eroding its unique position. And with this acknowledgement, we hope that the Hong Kong Government, the regulators and HKJC will find new arrangements, with adaptation to the changing world, that will enable the continued support that is provided to local organizations, many of which are indispensable for the civil society of Hong Kong.

Name : Mr Wander Meijer

Representing organisation (if applicable) : Kadoorie Farm and Botanic Garden Corporation

Date : 28 August 2023

Signature : 



Note: Please read the Personal Data Collection Statement on the next page.

Personal Data Collection Statement

It is voluntary for any members of the public to provide his/her personal data as requested in this submission form. Any personal data provided will only be used by BLC for the purpose of understanding the views of members of the public on HKJC's proposals. If necessary, the submission and personal data collected may be transferred to the relevant Government bureaux or departments for the purpose of handling HKJC's proposals.

The written submissions received may be published to the media and the public. **If you do not wish your name / your representing organisation's name and / or your views to be disclosed, please specify in your submission.**

For access to or correction of personal data contained in your submission, please contact the secretariat in writing.

Address: 13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(Attention: Secretariat to the Betting and Lotteries Commission)
Fax No.: 2591 6002
E-mail: ha2@hyab.gov.hk

Secretariat to the Betting and Lotteries Commission
28 July 2023



W.

Réf. EDR-28-08-003

**Mr. YIP Chun-to, Adrian, B.B.S., M.H.,
J.P.**

Chairman

Secretariat to the betting and lotteries
Commission

13/F West Wing

Central Government Offices

2 Tim Mei Avenue

Tamar

HONG KONG

Paris, 27th August 2023

Sent by e-mail: ha2@hyab.gov.hk

Subject: Hong Kong Jockey Club proposal to increase the maximum number of simulcast races per racing season and the maximum number of overseas horse races per simulcast day

Dear Mr Yip,

France Galop has been informed that the Hong Kong Jockey Club (HKJC) has made an application to increase the maximum number of simulcast races per racing season and the maximum number of horse races per simulcast day.

France Galop is a non-profit association which governs horse racing in France under the umbrella of the Ministry of Agriculture, the Interior Ministry and the Ministry for the Budget and is one of the two shareholders of the PMU which, in France, has a monopoly on horseracing betting shops and is the main online horseracing betting operator. The PMU is also an online sport and poker betting operator.

France Galop has organized more than 5.000 simulcast races in France in 2022 from 7 to 12 races per day.

Some of the best races in the world take place in France like the Qatar Prix de l'Arc de Triomphe which has been crowned the best race in the world in 2015, 2017, 2018, 2019 and 2021.

French racing has put in place a very high level of integrity of racing as all the stakeholders are subjected to a police enquiry performed by the Racing and Gaming Police of the Interior Ministry - before being registered by France Galop. Then a registration can be withdrawn based on public order reasons and on request of the Racing and Gaming Police. Moreover, since 1st January 2020, doping cases can end up not only to disciplinary decision but also to criminal prosecutions.

France Galop and the HKJC have put in place a simulcast cooperation since several year now and French racing seems to be very appealing to Hong Kong customers as they know some French stakeholders competing during the Hong Kong International Races or French jockeys who came riding in Hong Kong with a permanent or a temporary license.

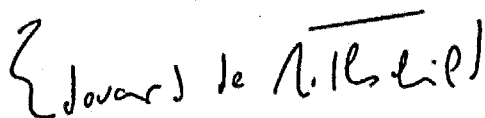
Having said that, the HKJC is one of the best organizations in terms of quality and integrity of the races.

.../...

Based on the French experience, we consider that increasing the number of simulcast races and the number of races per simulcast day in a legal environment will higher the number of racing fans and will concur to make racing a global sport.

France Galop stays at the disposal of the Betting and Lotteries Commission to give some more information or clarification if necessary.

Yours sincerely,

A handwritten signature in black ink, reading "Edouard de Rothschild". The signature is written in a cursive style with a horizontal line above the name.

Edouard de ROTHSCHILD

Chairman

To: [HA2/HYAB](#)
Subject: Hong Kong Jockey Club Proposal on horse race betting activities
Date: 2023年8月28日 16:08:29

Dear Sir

I write in support of the above proposal of July 2023 for

Increase the maximum number of simulcast from 15 to 25 per year

And

To increase the maximum number of non local horse race per one simulcast day from 9 to 12 races.

We hope that the Jockey Club will continue its effort in increasing charities support and also antigambling treatment

Dr. Edward Leung
President
Hong Kong Association of Gerontology



自由黨就《香港賽馬會增加賽馬博彩活動的建議》公眾諮詢
意見書

2023年8月28日

自由黨支持香港賽馬會（下稱：馬會）向特區政府的建議，將每年同步聯播賽事的上限由 10 場增加至 25 場；並把每個同步聯播日的非本地賽事場數上限由 9 場增至 12 場。

財政司司長陳茂波在今年《財政預算案》中建議自 2023／24 年度起，在《博彩稅條例》下向香港賽馬會徵收每年 24 億港元的「額外足球博彩稅」，為期 5 年，而原有博彩稅稅率不變，這樣既可增加政府短期收入，又不影響市民贏波的派彩金額，從而維持足球博彩的競爭力，更不會影響馬會每年撥予慈善機關的善款。

過去馬會因受制於同步聯播日的場數上限，而無法轉播部分有本港賽駒及騎師參與的非本地賽事，實在十分可惜，馬迷或因此而轉投非法博彩渠道下注。自由黨認為，馬會增加非本地賽馬日的聯播賽事，既可以增加博彩稅收，減少「額外足球博彩稅」對馬會所造成的影響，亦可以減少市民參與非法博彩的誘因，因此對此表示支持。

長遠而言，自由黨認為，政府應容許馬會增加博彩項目，從而增加庫房稅收。現時非法博彩對馬會營運造成重大威脅，政府可以考慮讓馬會增加的「足球博彩」項目款式，以增加馬會對外圍的競爭力，並有助打擊非法博彩。

此外，政府應考慮針對受歡迎的體育賽事增加博彩項目，容許馬會開辦更多合法的體育賽事博彩項目，例如：F1 賽車及 NBA，以增加博彩稅收入，提升庫房收益。政府亦可容許馬會擴大「全球匯合彩池」，透過越洋轉播及受注，吸引各地人士參與本港賽馬博彩。