

Written submissions from
organisations

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

團體意見書

*(不包括九份表示不願意公
開的意見書)*

Annex II e

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

Please refer to Appendix 1. te

Name e : CHOW Kei-chung e

Representing organisation (if applicable) : Aberdeen Kai-fong Welfare Association Limited

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

Views on Increasing the Number of Simulcast Days

On behalf of Aberdeen Kai-fong Welfare Association Social Service (AKA), we write **to express our support to the proposal of increasing the number of simulcast days** proposed by the Hong Kong Jockey Club (HKJC) with the following justifications:

1. Evidences show that Hong Kong bettors go for illegal / offshore operators during the local race summer break. Increasing the number of simulcast days on non-local race is an effective way to combat the illegal channel and bring the Hong Kong bettors back to legal during the summer break.
2. The increase of 14 simulcast days will generate additional resources which benefit Hong Kong society, including an increase of government betting duty, creating job opportunities and revenue for HKJC Charities Trust.
3. Noting that the increase of simulcast days in the summer break may bring about negative impacts on young people; yet, gambling disorder and addiction is a complicated social problem with multi-dynamic factors. Over the past 10 years, the Government and NGOs have supportive services for the pathological gamblers to abstain from gambling. We cannot simply associate the simulcast days to these complicated social phenomena. To make a benefit-risk evaluation on the increase of simulcast days in the summer break, the potential social and economic benefits mentioned in point 2 far outweigh its side effect and potential risk.



By Email: hab3@hab.gov.hk

11th November 2020

Mr. David Fong Man-Hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F West Wing
Central Government offices
2 Tim Mei Avenue
Tamar, Hong Kong

I am writing to support the Hong Kong Jockey Club's application for increased international simulcast opportunities. On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, Ascot Racecourse's comments are below.

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, in June.

Ascot is a partner with the Hong Kong Jockey Club 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.

Ascot's own parimutuel betting operation, "Bet With Ascot," bets into the Hong Kong Worldpool at Royal Ascot and on British Champions Day in October, with significant mutual benefits. The opportunity to expand this international collaboration would be most welcome which might otherwise be hindered in its development.

Interest in international racing has never been higher around the world and we hope very much that approval will be given for more of our premier fixtures to be shown in Hong Kong, including Europe's mid-season championship race, the King George VI & Queen Elizabeth Stakes in July.



I would like to draw your particular attention to our agreed plan (Covid permitting) in 2021 to welcome a team of jockeys representing the Hong Kong Jockey Club to participate in the prestigious and unique Shergar Cup team competition in August. Both parties are excited to see Hong Kong's best compete at Ascot and this is something both we and the Hong Kong Jockey Club particularly feel the fans in Hong Kong will embrace on a wagering and sporting level.

We believe both these opportunities would enable Hong Kong fans to enjoy quality and competitive thoroughbred horse racing during Hong Kong's summer break season.

Given the break in Hong Kong racing in our summer, the opportunity to fill that gap and extend Worldpool is something we hope that you will agree is very much in the interests of the business of Hong Kong Jockey Club, its considerable charitable beneficiaries and fans of this global sport in Hong Kong.

Yours sincerely

Guy Henderson
Chief Executive Officer

Nick Smith
Director of Racing and Public Affairs

Australian Turf Club

ROYAL
RANDWICKROSEHILL
GARDENSCANTERBURY
PARKWARWICK
FARM

20 November 2020

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

hab3@hab.gov.hk

Dear David,

RE: INTERNATIONAL HORSE RACING SIMULCAST DEVELOPMENT

On behalf of the Australian Turf Club we 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 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 fans, 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 allowable 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.

With the globalization of racing in mind and the challenging circumstances presented by Coronavirus there are discussions in many racing jurisdictions about the appropriateness of simulcast reviews in 2021 and the future flexibility provided 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 assessments of the number of simulcast opportunities exchanged and for the most relevant regulations to be reflected in these agreements.

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 and potential benefits for both 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 throughout July and August;
- facilitating simulcast and commingling development among HKJC and other racing jurisdictions;
- encouraging participation of HK connections in overseas races and over the longer term facilitate the awareness that drives future participation from international connections in Hong Kong

In these extraordinary times international cooperation is most important, in particular between those jurisdictions still racing. With so many changes affecting the global racing calendar during this 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.

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 to 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 2021 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



Matt McGrath
Chairman



Jamie Barkley
Chief Executive Officer

Annex II

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

As per the current COVID-19 pandemic situation around the world, many industries' business model has changed to cope with the significant decreasing income. HKJC is the biggest charity donor and supporter in Hong Kong and has the worldwide reputation to support the society to fill-in the service gaps in different social services. Their sustainability of income and donations to the community is crucial to many people in needs.

As this changes is not affecting any legal implications in the law of Hong Kong and would benefit many of the people in needs. I would support this initiative. We trust the HKJC will have equal and even more commitment to those gambling abused and addicted.

Name : Walter Tsui Yu Hang

Representing organisation (if applicable) : CareER Association

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

Annex II

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

We support HKJC proposal to increase the simulcast days to combat illegal gambling as well as to maintain a sustainable charitable fund to support various local charity projects. COVID-19 pandemic has imposed huge and adverse impact across all sectors, esp the disadvantaged and vulnerable groups. Their demand for services and support will be tremendously increased in coming years. HKJC's continued charitable contribution will be crucial in providing ongoing support to address the post-COVID-19 emerging needs.

Name : Cora Chu

Representing organisation (if applicable) : Dialogue In The Dark (HK) Foundation Ltd

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

EMHF

European & Mediterranean
Horseracing Federation

19th November 2020

By email : hab3@hab.gov.hk and post

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Dear Mr Fong,

The European & Mediterranean Horseracing Federation ("EMHF") writes in support of The Hong Kong Jockey Club's ("HKJC") application to increase its simulcast race days by 14, commencing in 2021.

As a regional Federation that is part of the International Federation of Horseracing Authorities ("IFHA"), we would like to share some insights into the benefits that simulcasting of races can bring for our sport around the globe.

Comprising 26 member authorities from across the region, the EMHF was founded to co-ordinate the promotion of Thoroughbred horseracing in Europe and the Mediterranean, to bolster the prestige of the sport of horseracing, to protect its integrity, and to develop relations between the organisations responsible for the running of the sport.

The HKJC is known as one of the most respected horseracing authorities globally, particularly for its uncompromising integrity and commitment to the betterment of Hong Kong society. The HKJC is also known globally for the competitiveness of its equine athletes and the world-class nature of its racing product. Horses and Jockeys from across EMHF jurisdictions travel to Hong Kong each December for a chance to compete in some of the world's best Group 1 racing, watched by fans internationally.

Tying into the HKJC's commitment to world-class class racing is the need for Hong Kong fans to have access to the best racing that other jurisdictions have to offer. With many of Europe's premier races held over July and August, the same time that Hong Kong has its annual break from racing, we are eager to highlight the benefits that could come from granting Hong Kong fans access to legal simulcasts of this top racing.

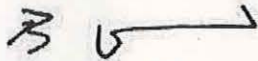
The opening of further simulcast opportunities during Hong Kong's summer break would provide exceptional opportunities for Hong Kong racing fans to watch some of Europe's best races, including some in which Hong Kong-based horses, owners and jockeys may participate. From a European perspective, to have Hong Kong fans able to enjoy our summer racing, just as fans from across EMHF jurisdictions enjoy Hong Kong racing from September to early July, would be both gratifying and hugely beneficial for our sport.

Simulcasting of top international races is a key to ensuring the continued growth and improvement of our beloved sport. By exposing all international jurisdictions to the top quality events that our sport has to offer, there is a natural incentive for domestic racing jurisdictions to continually improve their own racing product and to become more internationally competitive. There are also substantial financial benefits to all parties through commingling.

Simulcasting helps to keep fans engaged with our sport during the breaks from racing that are necessary in many jurisdictions, such as the summer racing break in Hong Kong. With Hong Kong fans unable to access legal means of wagering on many of Europe's most prestigious races over the summer, there is a real risk that those fans may be tempted to pursue illegal methods of wagering instead. This diverts money away from governments and has a negative impact on our sport's integrity. It can also lead customers to grow disappointed as they are denied access to wager on some of the world's best racing experiences, particularly from Europe. Continued fan engagement through legal wagering on our sport forms the cornerstone of horse racing's long term viability. As a result, denying fans access to legal forms of wagering and engagement will potentially drive them to illegal betting entities which seek to illicitly profit from our racing. This can only damage our sport's reputation and sustainability.

We hope that the Betting and Lotteries Commission will support the HKJC's application for more simulcast race days, as doing so would benefit horse racing in Hong Kong, Europe and beyond.

Yours sincerely

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

Brian Kavanagh
Chairman



FRANCE GALOP

Réf: OD-20-11-001

Boulogne, November 2nd, 2020

Le Directeur Général

Mr David Fong Man-Hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Dear Mr Fong,

We are aware that the Betting and Lotteries Commission is currently considering the application of The Hong Kong Jockey Club ("HKJC") regarding the increase of 14 simulcast days with the overwhelming majority to be implemented during the summer each year starting from 2021. I hoped that France Galop ("FG") can offer our views for the Commission's deliberations by providing an international perspective to the application.

France Galop

Funded by horse racing levy, France Galop is a non-profit organisation that oversees the thoroughbred horse racing industry in France.

France Galop rule racing in France on over 150 racecourses and operates itself five racecourses and encourages the breeding and training of racehorses by providing highly rewarding prize money and attractive premiums to owners and breeders. It runs the racing calendar for thoroughbred racing in France and organises some of the world's most famous races. It is also the authorising body for licensing owners and racing professionals such as trainers and jockeys. With the stringent racing rules and regulations, we uphold the highest racing integrity by forbidding prohibited substances in horses and implementing frequent laboratory tests to racehorses.

With the joint efforts of HKJC, FG commits to upholding the international standard of racing by complying strict rules and regulations. FG collaborates with HKJC to present the French Day in May each year at Happy Valley Racecourse, where two cup races Le French May Trophy and the France Galop Cup will be staged. In the context of its partnership with Longines as the official sponsor, and International Federation of Horseracing Authorities that promotes the international classifications of races, horses and jockeys, FG devotes to organising horseracing events that gains worldwide reputation.

Tendency and challenges on global racing

Global trend in horse racing

In fact, July and August is the peak season for racing overseas particularly top European races. Around 60 countries in the world are active in horse racing, each of them has their respective peak horse racing season based on climate, geographic or other social constraints. In France the highlight of summer racing is undoubtedly the Deauville racing festival which takes place every August. It offers 17 days of high class international racing including 5 Group 1 races. Of note, FG has enjoyed a successful partnership with HKJC during that festival, HKJC being the official sponsor of an important race in the French programme.

Unlike most racing jurisdictions where horse racing is year-round to meet local demand, Hong Kong has a summer racing break starting from mid-July to end of August, when HKJC is not allowed to offer simulcast to many of the prestigious overseas races. If Hong Kong is unable to keep pace with the world trend in simulcast, this could hinder Hong Kong's leading position in world racing.

Exploitation of illegal/offshore bookmakers during the summer break

This gap in Hong Kong's summer racing calendar has created loopholes for illegal and offshore operators, which are usually linked to organised crimes, to offer year-round betting opportunities to Hong Kong customers for placing bets on overseas races including our prestigious races in France through illegal platforms.

HKJC is well-recognized as one of the world's leaders in establishing top-class racing. The restriction that HKJC is not able to offer simulcast races during the summer racing break will certainly create barriers to HKJC to recapture betting demand from illegal back to legal channels. This overlook in local demand for betting will encourage illegal betting activities.

Advancement in technology

Technology advancement in internet-based betting applications enables illegal and offshore bookmakers to operate in lower cost, increasing speed and low regulation jurisdictions, even they are remote from their customers. These changes are challenging all racing jurisdictions internationally, not only in Hong Kong, but also Asian as well as European countries. Illegal betting activities create direct threat to governments and their revenues, they also put huge constraints in enforcing responsible gambling measures and placing integrity of racing and other sports at risk.

Conclusion

Aside from their important role in combatting illegal gambling, HKJC's betting operations also generate substantial community revenue to support charitable donations. Based on these circumstances, we sincerely encourage the Commission to give favorable consideration to HKJC's proposal.

Sincerely yours,



Olivier Delloye
CEO



German Tote Service- u. Beteiligungs GmbH // Marktsstraße 23 // D-31535 Neustadt a. Rbge.

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

By email : hab3@hab.gov.hk

Neustadt, 18.11.2020

Dear Mr Fong,

At German Tote, we are aware that the Betting and Lotteries Commission is currently considering an application from The Hong Kong Jockey Club ("HKJC") to increase the number of simulcast race days by 14, commencing in 2021. We are writing to support this application and we feel that as a major European wagering organisation, we can offer insights into the value that extra simulcast race days can bring to governments and racing bodies alike.

German Tote is a wagering operator, a technical service provider for betting shops and a marketer of horse racing in Germany. In 2015, the French wagering company Pari-Mutuel Urbain ("PMU") bought a controlling share in German Tote, with the minority share being retained by BGG Betriebsgesellschaft der Galopp Rennvereine mbH ("BGG"). PMU is the largest pool betting operator in Europe and the third largest provider of wagering on horse racing internationally. BGG's shareholders comprise 22 German gallop racing clubs.

As well as operating its own betting shops, German Tote operates approximately 70 betting shops under licence, and also runs Wettstar, an online wagering site. It also markets the live television broadcast of races held by German horse racing clubs to national and international partners.

Simulcasting of international races connects racing bodies and racing fans globally. For European racing fans, simulcast HKJC races offer Europeans access to one of the best racing experiences on offer globally. From the perspective of a wagering organisation, the simulcast events offered to our clients are a driver of revenue, especially during the winter off-season.

Like Germany, Hong Kong too has a break from racing - over the summer instead of the winter. Fortunately, the months of July and August represent the premier months of the European racing calendar, so increasing the number of simulcast days permitted by the HKJC at that time would grant racing fans access to some of Europe's leading racing events. Not only would fans benefit from such an arrangement, but the HKSAR Government would too - from bigger returns from legal wagering when they would otherwise experience a significant lull.

WETTSTAR.de

ist eine Marke von:



Understanding the needs of racing fans, German Tote believes that an annual break of almost two months between July and August - during which time Hong Kong customers are unable to access legal wagering channels on their favourite sport of horse racing - is a potent recipe for customer dissatisfaction, which may lead to undesirable outcomes.

Hong Kong racing fans do not lose interest in racing purely because local races are on break, so their desire to wager over the summer is unlikely to subside. With the best European horse races conducted over the summer, Hong Kong fans may turn to illegal, unregulated and untaxed channels to wager. In this situation, the only party to benefit is the illegal bookmaker who exploits the customer and pays no fees to racing bodies and no tax to the relevant government. Fans are harmed because illegal bookmakers have no obligation to ensure responsible wagering. The HKJC is also harmed as it is unable to offer its customers a legal alternative channel to wager. And the government suffers, as revenue is lost into unregulated hands.

There is a great many positives to the HKJC's application and feel that granting the Club the right to offer more simulcast race days over the summer would benefit racing fans and the government.

Kindest Regards

A handwritten signature in black ink, which appears to read 'Riko Luiking'. The signature is fluid and cursive.

Riko Luiking
Managing Director



HONG KONG AMATEUR SWIMMING ASSOCIATION

Ref. No.: 2020110021

23rd November 2020

By Email & Post

President

Mr. Ronnie Man Chiu WONG, B.B.S., J.P.

Vice Presidents

Dr. NG Kin Sun

Dr. David Tak Yeung MONG

Dr. Jimmy Chi Ho WONG, S.B.S., J.P.

Hon. Secretary

Ir. David Chin Hung CHIU

Hon. Treasurer

Ms. Aurora Ka Yi CHUI

Assistant Hon. Secretaries

Mr. SZETO Ping Hang

Mr. Wilson Kam Tat YEUNG

Executive Committee Members

Mr. Edward Ho Ming CHENG

Mr. CHING Hon Wai

Mr. Ambrose Kai Ip CHING

Mr. LAM Siu Tong

Mr. Steve Chi Kwong LEE

Ms. LEE Pui Ki

Mr. NG Yuk Kong

Mr. TANG Wing Hong

Dr. Howard Kai Hay WONG

Mr. YUEN Wai Pui

Mr David FONG Man-hung, BBS, 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. FONG,

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

Referring to the proposal from Hong Kong Jockey Club's
regarding to increase the number of simulcast days.

We write to express our support to the said proposal.

We noted that the revenue for charities donation will be
increased and 1,100 job opportunities will be created after the
proposal implemented. Due to the COVID-19, Hong Kong may
take time for economic recovery and the proposal will definitely
help the community and the underprivileged families to get over
the hard time.

Hong Kong Charities Trust is committed to improve the quality of
life of the people of Hong Kong, and provide relief to those in
need. The Trust has donated funds to Hong Kong Amateur
Swimming Association to organize Jockey Club Learn to Swim
Programme from 2016 to 2018, to provide swimming lessons to
primary one student for free, which received overwhelming
responses and positive feedback. After review, the new
programme will be co-organized with Ocean Park, targeted to the
under-privileged students, to be launched in 2021.

As one of the partners of HKJC, we are honour to corporate with
HKJC to help the community and underprivileged, and happy to
see the Trust to donate more funds to the organizations,
organizing different programmes to help people in needs in the
coming future.

Permanent Hon. President

The Hon. A. de O. SALES G.B.M., J.P.

Permanent Hon. Vice Presidents

Dr. WONG Yat Sun

Mr. TUNG Kam Sing

Mr. Arthur Siu Ming KWAN

Hon. Medical Advisor

Dr. Julian CHANG

Hon. Technical Advisor

Ms. GUO Jing Jing

Hon. Legal Advisor

Mr. Simon LAU



HONG KONG AMATEUR SWIMMING ASSOCIATION

Thus, we support the captioned proposal from Hong Kong Jockey Club.

President

Mr. Ronnie Man Chiu WONG, B.B.S., J.P.

Vice Presidents

Dr. NG Kin Sun

Dr. David Tak Yeung MONG

Dr. Jimmy Chi Ho WONG, S.B.S., J.P.

Hon. Secretary

Ir. David Chin Hung CHIU

Hon. Treasurer

Ms. Aurora Ka Yi CHUI

Assistant Hon. Secretaries

Mr. SZETO Ping Hang

Mr. Wilson Kam Tai YEUNG

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Mr. Ambrose Ka' Ip CHING

Mr. LAM Siu Tong

Mr. Steve Chi Kwong LEE

Ms. LEE Pui Ki

Mr. NG Yuk Kong

Mr. TANG Wing Hong

Dr. Howard Kai Hay WONG

Mr. YUEN Wai Pul

Yours sincerely,

Ronnie Man Chiu WONG, BBS, JP
President

Hong Kong Amateur Swimming Association

Permanent Hon. President

The Hon. A. de O. SALES G.B.M., J.P.

Permanent Hon. Vice Presidents

Dr. WONG Yat Sun

Mr. TUNG Kam Sing

Mr. Arthur Siu Ming KWAN

Hon. Medical Advisor

Dr. Julian CHANG

Hon. Technical Advisor

Ms. GUO Jing Jing

Hon. Legal Advisor

Mr. Simon LAU

Annex II

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

"Hong Kong Arts Centre (HKAC) is a statutory body dedicated to nurturing and promoting many varied forms of contemporary arts and culture through arts programming and education to the widest audience base in Hong Kong. The Hong Kong Jockey Club Charities Trust (JCCT) has been a generous and invaluable supporter of HKAC and their staunch support has enabled HKAC to bring real impact to Hong Kong societies through HKAC's sustainable arts and cultural programmes. HKAC deeply appreciates JCCT's support which includes the ifva everywhere, Jockey Club ICH+ Innovation Heritage Education Programme, and Jockey Club Pop-up Art Park, and believes that the sustainability of this funding body is critical to the continued growth and development of the arts and cultural scene of Hong Kong. HKAC supports HKJC's proposal to increase the maximum number of simulcast days per year by 14 (i.e. from 23 to 37 days) and allow such additional simulcast days to take place during the summer break starting from 2021."

Name : Connie Lam

Representing organisation (if applicable) : Hong Kong Arts Centre

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

To: Mr David Fong Man-hung, BBS, JP
Chairman, Betting and Lotteries Commission

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

E-mail: hab3@hab.gov.hk

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

On HKJC's proposal to increase the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my Organisation's comments are as follows:

The Hong Kong Jockey Club (HKJC), through its Charities Trust, has supported the Hong Kong Arts Festival (HKAF) for around 49 years. It has provided annual funding in a number of programmes to help and enable the organization to achieve its mission to serve Hong Kong by:

- Improving the quality of life in the city
- Providing high level, high quality artistic experiences for a wide cross-section of the public
- Introducing the world's great artists and ensembles to audiences and artists in Hong Kong
- Enabling creative talent in Hong Kong to perform alongside international talent
- Supporting local talents in new, original commissioned works
- Reaching out to students via arts education programmes
- Promoting arts inclusivity to the community

As mentioned in the proposal submitted by the HKJC, increasing simulcast days will create additional job opportunities, which we believe would benefit the society especially in difficult times. As a non-profit organisation which receives support from HKJC's Charities Trust, we also welcome the possibility that this will allow the club to generate additional revenue which will go towards funding more charitable contributions. The increase in taxes payable will also be helpful to Hong Kong as a whole.

HKJC has been very supportive towards projects organised by the HKAF. One of the main focuses of this partnership has been to address young people in underserved communities by providing quality arts education to enhance healthy, whole-person development. The HKJC Student Matinee Project, in particular, helps to broaden students' perspectives and experiences, and contributes to their all-round development, in line with the promotion of STEAM education in Hong Kong.

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 HKJC Contemporary Dance Series and the JC Local Creative Talents Series are not only beneficial to the participating artists, but also impact the entire sector as well as partners, stakeholders and audiences. Outreach and educational work, which are an integral part of this partnership, further extends the impact and benefit to students and youth.

The HKAF's latest partnership with the HKJC involves a special project "No Limits" which focusses on the special conditions of the disabled, in order to explore and promote inclusiveness and understanding in all populations. Comprising performances as well as a diverse range of outreach programmes, No Limits enables international and local artists of different abilities to perform at the highest levels both on stage and in public spaces around Hong Kong to exemplify what can be achieved despite various limitations, and to promote inclusiveness and understanding.

As a non-profit organisation that relies extremely heavily on sponsorship and donations, the HKAF would not be able to continue presenting high quality arts performances and activities for the Hong Kong community without the support from HKJC. Their support also enables HKAF to utilize the Government's Arts Development Matching Grants Scheme. Support of the HKJC is critical to our mission and purpose; without this support, it would be impossible for HKAF to help maintain this city's position and image as a vibrant, creative and cultured city. Therefore, the proposal to increase revenues as outlined is strongly supported.

In the past 49 years, Hong Kong society had witnessed many social and economic challenges. But even during the most difficult of times, HKAF was able to count on the support of our long partner HKJC, which has always been helpful and supportive of the Festival's work. HKAF firmly believes that with the extra revenue generated from increasing simulcast days, HKJC will be able to further contribute towards society and help charities and organisations like HKAF continue to flourish and develop.

Name : Tisa Ho

Representing organisation (if applicable) : Hong Kong Arts Festival

Annex II

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

The Hong Kong Association of Gerontology has been in partnership with The Hong Kong Jockey Club since 2001 in doing utmost for the well-being of the senior citizens in Hong Kong. Through the generous donations and contributions of the Club's Charities Trust, a number of meaningful projects was launched, which has raised the community awareness of giving respect to the elderly to enjoy their golden years with quality and dignity. We appreciate that the Club's surplus is earmarked for charitable causes to improve the quality of life of the people of Hong Kong, and providing immediate relief to those most in need. Our Association definitely supports HKJC's proposal, as the ultimate beneficiaries of the proposal would be vulnerable groups and the society as a whole.

Name : Dr. Leung Man Fuk, Edward

Representing organisation (if applicable) : Hong Kong Association of Gerontology

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

Annex II

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

We are in support of the Hong Kong Jockey Club (HKJC)'s proposal of increasing the maximum number of simulcast days.

We anticipate that if the HKJC were to offer simulcast betting during the summer break, it would help combat illegal betting operations, encourage bettors to switch back to a legal channel, and ultimately, reduce the negative impacts that illegal gambling is bringing to the society.

In addition, HKJC's betting operations has been donating generously over the years to its Charities Trust, which in turn, has acted continuously for the betterment of our society.

The donations made through the Charities Trust to charity and community projects has provided tremendous relief to those in need and to the community of the Higher Education. We believe that with the increase in simulcast days, HKJC and its Charities Trust will be able to further their devotion in charitable causes.

Name : Prof. Roland T. Chin

Representing organisation (if applicable) : Hong Kong Baptist University

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

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my Organisation's comments are as follows:

The Hong Kong Elite Athletes Association is established in 1996 by athletes who have represented Hong Kong before in Asian Games and above or equivalent level of competition. One of our key objectives is to promote sports to young people and the community, and the overall wellness of the society and more positive mindset.

We have been able to scale our Active School and Active Community programme in the last few years with the support of the HKJC Charities Trust donations. We are very supportive to the HKJC's propose to increase the number of simulcast days. Not only that it will discourage illegal betting, very importantly, it will increase the revenue for charities donations. This will ensure more sustainable support to community projects such as ours, with more young people benefit from participating in the programme.

Name: Malina NGAI, JP

Vice-President

Representing organisation: Hong Kong Elite Athletes Association



Hong Kong Equestrian Federation

Mr. David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

16 November 2020

Dear Mr. Fong,

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

We are aware that the Betting and Lotteries Commission is currently considering the application by The Hong Kong Jockey Club ("HKJC") to increase the number of simulcast days by fourteen starting from 2021. Further to the request for views on the proposal, as stated on your website, I write in support of this initiative.

The Hong Kong Equestrian Federation ("HKEF" and formerly known as Hong Kong Equestrian Society) was established in 1973 with the support of HKJC. HKEF is the only official body in Hong Kong representing equestrian sports at both the national and international level. As a member of the Federation Equestrian International, the international governing body for the equestrian sport, the HKEF works in close partnership with the Hong Kong Jockey Club in respect of a number of national and international events as well as in developing interest in the equestrian sport at all levels in Hong Kong.

It is because of this shared collaboration that public enthusiasm for equestrian sports has grown so substantially. This is most evident in the Club's support for riding schools, which are open to the public, but can also be seen through the Club's support for numerous equestrian-related activities for the Hong Kong public.

One of the HKJC's greatest contributions to equestrian sport was made in 2008 when they were the Outstanding Contributor in providing the venue for the 2008 Olympic and Paralympic Games to be staged in Hong Kong. Furthermore, HKJC sponsorship of Hong Kong riders through the Hong Kong Equestrian Plan, has enabled riders to receive world class training, and as a result to compete at the highest international level, winning medals in major international competitions.



Hong Kong Equestrian Federation

Between 2016 and 2022, the HKJC has committed investment of over \$250 million towards the Hong Kong Equestrian Performance plan, providing elite athletes with support, horse power and funding to enable them to win historic individual gold medal at the 2018 Asian Championships, as well as team gold in the 2019 FEI Asian Championships, as part of an overall medal haul of 5 medals. This investment has also helped two athletes qualify for the forthcoming Olympic Games and three athletes for the Paralympic Games in Tokyo 2021.

In addition to the support provided to our Hong Kong riders, the HKJC provides office accommodation, as well as equestrian venue and logistical support to enable the federation to achieve its aims and objectives.

Without the support from HKJC, our work would simply not be possible. Therefore, we very much support any responsible initiatives of the Club to increase its revenue by increasing the number of simulcast days. This initiative will generate additional revenue and ultimately sustain its charitable donations to social organizations such as ours and be for the benefit of the Hong Kong public.

HKJC is not a commercial body and is a responsible social organization which has been a staunch charitable donor in the past decades. We thus hope that the Betting and Lotteries Commission would give favorable consideration to HKJC's proposal to enable HKJC to operate on a sustainable basis.

Yours sincerely,

Mr. Michael Lee
President

Annex II

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

I am writing on behalf of Hong Kong Kidney Foundation. We are most fortunate to have received tremendous support from HKJC Charities Trust over the years for the needy patient on dialysis treatment. Many charitable organisations are in debt to HKJCCT for their kind support.

We support a formal and orderly increase in the Simulcast Days. It is a better option than the the current illegal betting during the summer time.

We believe HKJC is a responsible organisation and will uphold the proper management of betting for Hong Kong Citizen.

Name

: Dr. Lui Siu-Fai, BSS, MH, JP

Representing organisation (if applicable) : Hong Kong Kidney Foundation

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

25 November 2020

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

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



香港網球總會
Hong Kong Tennis Association

27 November 2020

By Email

Mr. David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

Dear Mr. Fong,

Re: Comments on Proposal of Increasing the Number of Simulcast Days Submitted by the Hong Kong Jockey Club to the HKSAR Government

I am writing to you on behalf of Hong Kong Tennis Association (HKTA) to submit comments on the proposal submitted by the Hong Kong Jockey Club (HKJC) of increasing the maximum number of simulcast days per year by 14 and to allow such additional simulcast days to take place during the summer break starting from 2021. HKTA, 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 (especially during the summer break) 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 introduction of additional simulcast days will lead to increased revenue for charities, which will benefit the local community through the donation of operating surplus to the HKJC Charities Trust.

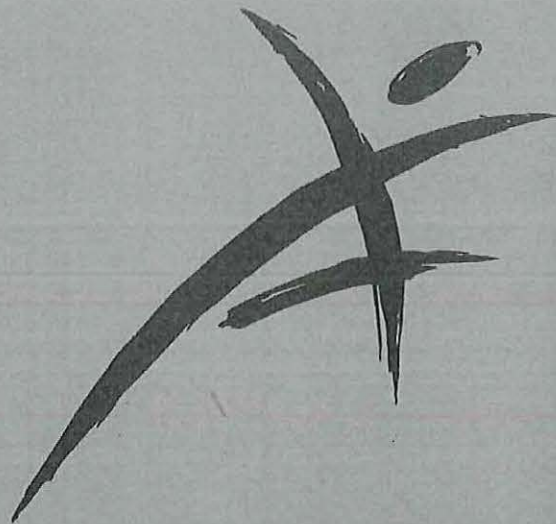
We hope the above comments will be useful in the Commission's evaluation of the proposal.

Yours faithfully,

Philip Mok
President, Hong Kong Tennis Association

23 November 2020

Mr David Fong Man-hung, BBS, JP,
Chairman, Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices
2 Tim Mei Avenue, Tamar, Hong Kong



Dear Mr Fong,

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\$60 million for 11 of HKYAF's large-scale community art projects, allowing us to engage with over 550,000 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 and 2020 – 2023*, 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



D016 2020-21

16th November 2020

By email : hab3@hab.gov.hk / post

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Dear Mr Fong,

Horse Racing Ireland ("HRI") is aware that the Betting and Lotteries Commission is considering an application of The Hong Kong Jockey Club ("HKJC") to increase the number of simulcast days by 14, mainly to take place during the summer each year starting from 2021. We are firm believers in the power of simulcasting for the development of our sport, and would like to offer our views for the Commission's consideration.

1. **Horse Racing Ireland – Background:** By way of background, HRI was formally established in 2001 and serves as the national authority for thoroughbred racing in Ireland. We are responsible for the governance, development and promotion of the racing industry in our country. HRI owns and operates four major racetracks in Ireland (Fairyhouse, Leopardstown, Navan and Tipperary Racecourses). We also assist with the development of racecourses, guarantee prizemoney, control bookmakers, and allocate the racing fixtures and race programmes. HRI receives a significant amount of its funding from the Horse and Greyhound Fund which is based on a levy on off-course betting. HRI represents Irish racing on the international stage, and is an active member of the International Federation of Horseracing Authorities.
2. **Irish Racing's Global Impact:** Ireland has deep roots in the long history of racing, and we are proud of our sustained contribution to all aspects of the sport and wider industry. We have a world-leading breeding industry, and our country produces thoroughbreds of the highest quality which go on to race around the world, including frequently in Hong Kong. Our participants are renowned, and regularly have impact at major race meetings across the globe, such as at the Hong Kong International Races in recent times when the world's leading trainer Aidan O'Brien has actively participated. As a racing authority, but also as a nation, we see much potential in the many opportunities that international racing brings.

3. **Impacts of the Global Pandemic:** The global pandemic has demonstrated how critical it is for racing authorities and governments around the world to work together for the benefit of our sport, its participants and its fans. By working together locally and globally, racing has had extraordinary success in keeping the sport going – and in keeping large numbers of people employed and businesses continuing. Through this process, we have all become more aware than ever of the vital importance of racing to our economies and societies.
4. The pandemic has challenged racing authorities to review their business and funding models, especially as racing was either suspended or as many race meetings were held behind closed doors for so long. We have had to ensure that our businesses are equipped to operate online – that customers are able to watch and wager via the internet, and that we can compete with other sports and emerging wagering products such as e-sports.
5. The pandemic has also demanded that we look forward at ways to expand our audience and customer base, and to build resilience and diversity in our revenue streams. Simulcasting is a perfect way to increase exposure to international markets in order to address challenges to, or gaps in, our revenue streams. Simulcasting expands the reach of our racing product around the world to a new and bigger base of fans, and it brings with it a wider and deeper pool of potential wagering customers.
6. **Simulcast as an additional income stream:** Where simulcast arrangements are complementary to the local racing product, they really act to provide a source of additional income to racing bodies and governments. As we have experienced during the pandemic, such additional income sources can play an important role in ensuring ongoing revenue to a local industry if it is temporarily suspended, as we were in Ireland for eleven weeks.
7. It is worth highlighting that some of Ireland's most significant race meetings are held during July and August, including the Irish Oaks. Like other major race meetings in Europe at this time, such meetings would profile well for an expanded simulcasting schedule in Hong Kong, particularly due to the high quality of horses, jockeys and trainers which compete. HRI believes that there would be excellent scope to work with the HKJC to satisfy the obvious demand for high quality racing during the Hong Kong off-season, especially for fans which are so accustomed to the top-class racing routinely hosted by the HKJC.

Summary

8. Whether it be through facilitating the participation of leading horses, jockeys and trainers at major race meetings around the world, or working to improve the international standards of integrity and safety, there are so many benefits for racing authorities and governments in working together to maximise the potential of our sport.
9. Expanding simulcasting throughout the world is an excellent way to increase and diversify both industry and government revenue sources and broaden our global fan base. Successful simulcasting undoubtedly represents a 'win-win' outcome for all, and accordingly, HRI endorses all appropriate steps to promote international simulcasting. We believe that the HKJC's proposal is such an appropriate step, and we throw our full support behind it.

Yours sincerely



Brian Kavanagh
Chief Executive

Mr David Fong Man-hung, BBS, JP
Chairman, Betting and Lotteries Commission

Simulcast racedays (IFHA)

Sent by email and posted, 10 November 2020

Ref 20-11-003

Dear Mr Fong,

We are aware that the Betting and Lotteries Commission is currently considering the application of The Hong Kong Jockey Club ("HKJC") regarding the increase of 14 simulcast days with the overwhelming majority to be implemented during the summer each year starting from 2021.

The International Federation of Horseracing Authorities ("IFHA") would like to offer our views for the Commission's deliberations by providing an international perspective to the application, in particular in relation to the importance of simulcast racing for our global sport, and in relation to addressing the threat of illegal betting in Hong Kong and elsewhere.

IFHA

By way of background, the IFHA is the global leader for the international sport of Thoroughbred racing. The IFHA's members include national racing authorities across the globe which stage Thoroughbred races. The HKJC is a member of the IFHA.

Amongst the IFHA's key objectives is the promotion and development of horse racing and thoroughbred breeding worldwide, including international competition; the promotion of the integrity of horse racing, including through supporting the fight against the use of prohibited substances and practices; pursuing, promoting, and protecting the commercialization of horse racing worldwide; and establishing quality control through grading of major races.

In pursuing its objectives, amongst various other things, the IFHA:

1. sets global standards for integrity, welfare and racing competition (particularly by establishing model rules, policies and guidelines through the IABRW to drive international good practice in all key areas of racing);
2. advocates on key racing policy and issues, both on behalf of IFHA members at a local level, and also, where appropriate, globally;
3. facilitates the sharing and exchanging ideas, information and expertise amongst IFHA members;
4. owns, administers and delivers the globally-accepted rankings for the World's Best Racehorse, World's Best Jockey and the Top 100 Group/Grade 1 Races; and
5. forms strategic partnerships with other global peak bodies to enhance international racing.

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

Trends and challenges in global racing

Global cycle in major horse races

Around 60 countries in the world are active in horse racing. Each has their respective peak horse racing season based on climate, geographic or other social constraints. Of particular note, the months of July and August are the peak season for racing in Europe (including in France, Ireland and the United Kingdom) and the United States (US), with many significant races held in those jurisdictions during that period. There are also highly important racing events held in other major racing jurisdictions, including, but not limited to, events in Canada, Japan, Singapore, South Africa and South America.

Unlike most racing jurisdictions where horse racing is year-round to meet local demand, Hong Kong has a summer racing break starting from mid-July to end of August, when the HKJC is not allowed to offer simulcast to many of the prestigious overseas races.

July and August represent months of high engagement, attention and focus for racing fans around the world, including in Hong Kong. During these months, there is strong demand internationally for fans to engage through wagering on European and US racing (amongst other jurisdictions), usually through simulcast arrangements which have grown over time.

Rise in illegal/offshore betting threats

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

The ARF's 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 ARF 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.

Illegal betting profits in Hong Kong in 2016 were estimated to be HKD 12 billion to HKD 13 billion (USD 1.6 billion at the midway point). By comparison, the HKJC's net margin (the amount left over after paying out winning bets and government duties) was HKD 11.45 billion in financial year 16/17. ...

As a not-profit, the Hong Kong Jockey Club returns its betting profits to society through tax, duty and charitable donations. In financial year 16/17, 79% of betting and lottery revenue was returned in this fashion. The HKJC is Hong Kong's largest single taxpayer and one of the world's 10 biggest charitable donors. Illegal operators, naturally, return none of their profits to society, and in fact use them to fund other criminality. It has been estimated that if illegal betting profits in Hong Kong could be diverted to legal channels, society would benefit to the equivalent of USD 1.2 billion a year.”

The IFHA is concerned that the trend of strongly growing illegal wagering will continue, and indeed, it appears to have expanded through the recent global pandemic. This expansion is being driven in large part by advancements in internet-based betting applications, which help illegal and offshore bookmakers to operate in lower cost, and low-regulation jurisdictions.

It is apparent that the summer break in Hong Kong's racing calendar has provided, and will continue to provide, an environment for illegal and offshore operators to exploit - by offering opportunities through illegal platforms to Hong Kong customers to place bets on overseas races, including prestigious races in Europe and the US. This opportunity exists in circumstances where there is simply no legal alternative for Hong Kong racing fans and customers to bet on some of the world's best races.

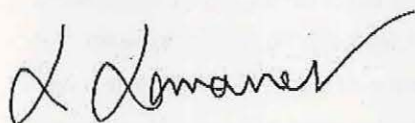
The HKJC is rightly recognised as one of the world's leaders in providing top-class racing. It is clear to us that by not being able to offer simulcast of overseas races during its summer racing break, barriers will continue to exist and prevent the HKJC recapturing betting demand from illegal operators back to the legal channel. By not providing legal opportunities for fans to wagering on such racing, it is likely that illegal betting activities will be facilitated, and valuable economic contributions which could otherwise flow to the legal market in Hong Kong, will be diverted into the hands of illegal, offshore operators.

Conclusion

For the IFHA, it is fundamental to the ongoing success of racing globally that racing fans are able to legally bet on races held in different jurisdictions. This is a major reason why we support the advancement of mutually beneficial simulcasting arrangements. Such arrangements maximise revenues for the relevant racing authorities and governments (and their communities), and minimise the expansion and threat of illegal operators.

The HKJC's capacity to contribute to government, society and community has long been demonstrated to global stakeholders and governments. This capacity has been made possible through leadership on integrity matters, and developing and promoting a world-class racing product. It has also been made possible by allowing the simulcast of high quality races from overseas to be enjoyed and legally wagered upon by Hong Kong's passionate fans. In our view, enhanced opportunities for the simulcast of races from overseas in Hong Kong during July and August is highly desirable, not just from a financial contribution and societal level, but also on the basis that it will stem the flow of illicitly obtained revenue from illegal operators.

The IFHA encourages the Commission to give favorable consideration to HKJC's proposal, and we would welcome the opportunity to answer any queries in relation to this submission.



Louis Romanet
IFHA Chairman



JRA

Japan Racing Association

November 13, 2020

(Sent by email)

Mr. David Fong Man-hung, BBS, JP Chairman
Betting and Lotteries Commission c/o Home Affairs Bureau
13/F., West Wing, Central Government Offices 2 Tim Mei Avenue
Tamar, Hong Kong

Dear Mr. Fong,

We notice that The Hong Kong Jockey Club ("HKJC") has recently applied for an additional 14 simulcast days with the overwhelming majority of these to be run in July and August each year starting from 2021. Japan Racing Association ("JRA") would like to provide our views on this proposal in a global perspective for the Betting and Lotteries Commission's consideration.

Japan Racing Association

Established in 1954, JRA operates under the oversight of the Japan Ministry of Agriculture, Forestry and Fisheries. The head office of JRA located in Tokyo, acting as the nerve centre for 10 racecourses, the 41 off-course betting facilities called "WINS" or "EXCEL" and other related entities in Japan. We also engage in activities concerning the development and operation of national horse racing and commit on promoting integrity of horse racing, horse breeding and other types of livestock programs. And in order to implement social responsibilities, JRA contributes turnover annually to the national treasury as well as public and social welfare, local environmental initiatives and financial support to regions major damages from natural disasters and more recently, to the countermeasures against COVID-19.

HKJC and JRA are like-minded legal operators that collaborate to ensure racing integrity, harmonization of racing rules and other related racing matters through the International Federation of Horseracing Authorities ("IFHA") and Asian Racing Federation ("ARF").

Besides, JRA shares the same with HKJC position that the recent growth of illegal betting poses threats to the integrity of racing and with low regulatory justification and absence of racing integrity, the illegal operators even infringe the intellectual property rights of legal operators. More importantly, the rapid expansion of illegal betting markets has seized the substantial government betting duty and community revenue that should be used for social goods, threatening the society financially and intangibly.

Summers' simulcast as alternatives to meet local demands

Same as other athlete sports, horse racing, not only in Hong Kong and Japan but also in other parts of the world, has greatly progressed the internationalization in recent years, and more horses and jockeys are taking part in major horse racing events outside their home countries. The development of media technology makes it possible and could provide more opportunities for racing fans to view races overseas. We have become more aware of an increase in desires and interests from local racing fans and bettors in supporting them with a connection to their home countries.

However, due to the current summer break restriction on simulcasts, bettors in Hong Kong are unable to place bets through HKJC's legal betting channel, and in consequence they are turning to illegal and offshore bookmakers.

These illegal and offshore bookmakers are taking advantage of Hong Kong's summer racing break by offering illegal betting platforms, which effectively capture the large and growing demand for top international race days offered in summers. Offering summer simulcasts will therefore address local demand for betting and help combat illegal gambling.

A role of horse racing as a public and social welfare

In order to research and implement the strategy of combating illegal gambling and returning the profits to the economy and society, ARF have currently formed a Council on Anti-Illegal Betting & Related Financial Crime, in which HKJC is taking a leading position. In advancing ARF's measurements convincingly to combat illegal gambling, to be allowed additional simulcasts in summers would be a key. It would reduce betting revenue flow to illegal and offshore bookmakers, stabilize betting turnover in the legal market, contribute to government betting duty and support the public and social welfare in Hong Kong.

Summary

It will be a significant loss to Hong Kong both economically and socially if the government's measures and policies remain stagnant. JRA respectfully encourages the Commission to actively consider HKJC's proposal from the perspective of the sustainability of racing, jointing the worldwide racing jurisdictions to combat illegal gambling and strengthening a sense of unity in the Asian racing industry.



Masayuki Goto

President and CEO

Japan Racing Association



17 November 2020

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Betting and Lotteries Commission Secretariat
13/F, West Wing, Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

Fax: 25916002

Dear Mr Fong *David*

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

On behalf of Lingnan University (LU), we write to submit our views on the Hong Kong Jockey Club (HKJC)'s proposal of increasing the maximum number of simulcast days per year by 14, and allow such additional simulcast days to take place during the summer break starting from 2021.

The HKJC is the major philanthropic organisation in Hong Kong that contributes to the ongoing development of our community and improvement of the welfare of the general public. With its unique operational model of allowing its surpluses from racing to benefit the community, HKJC has been making substantial donations to the community through The Hong Kong Jockey Club Charities Trust (the Trust), encompassing charity projects that cover Community Services, Education and Training, Medical and Health, as well as Sports, Recreation and Culture.

The Trust has a long history of supporting Hong Kong's education development, and LU has long been one of the beneficiaries of its generous donations. Apart from donating to LU for the construction and renovation of student hostels and offering student scholarships, the Trust has also made significant donations to support different research and community service projects, such as the Jockey Club Hong Kong History Learning Programme, LU Jockey Club Gerontechnology and Smart Ageing Project, Jockey Club "We Care, We Serve & We Learn @ Tuen Mun" Programme, Jockey Club Intergenerational Communication and Health Promotion Programme,



as well as the Project Ultra Violite which developed UV disinfection technology and provided free disinfection services for needy households through the COVID-19 Emergency Fund.

The HKJC's proposal on the increase of the maximum number of simulcast days per year from 23 to 37 and allowing the additional simulcast days to take place during the summer break starting from 2021 is anticipated to generate up to HK\$350 million betting duty per season, more than a thousand job opportunities, and additional revenue for charities donations. It is expected to cause minimal impact on youth, while providing a legal channel for betting during the summer break thus help combat illegal gambling offered by illegal/offshore bookmakers. Therefore we have no hesitation to support the proposal of increasing simulcast days during the summer break.

Thank you for your kind attention.

Yours sincerely

Matthew Mo

Director of Institutional Advancement and Alumni Affairs
Lingnan University

24 November 2020

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

By email: hab3@hab.gov.hk

Dear Mr Fong,

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 maximum number of international simulcast days, primarily through its summer break throughout July and August.

By way of background, 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.

Moreover, in the age of the prolific global exchange of horses, and expatriate participation, increasing crossover among and renown of one another's industries exists.

We believe that allowing the addition of simulcast days from within the summer break period in Hong Kong will enable the HKJC to maintain engagement in horseracing among its bettors in this peak period of racing, particularly in Europe, while local courses remain closed.

Without the capability to bet through the formal channels provided by the HKJC, we believe there is a serious risk of leakage of these customers to illegal/offshore operators, who not only avoid paying the appropriate government taxes and levies, but make no charitable contributions for which the HKJC is renowned, and for which the proceeds of simulcasts in this timeframe 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

A handwritten signature in dark ink, appearing to read 'Peter Le Grand', with a stylized, flowing script.

Peter Le Grand JP
Chairman
Melbourne Racing Club



Moonee Valley Racing Club

OFFICE OF THE CHIEF EXECUTIVE

27 November 2020

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Via Email: hab3@hab.gov.hk

Dear David

Re: HKJC Application for additional international raceday simulcasts

I am aware that the Hong Kong Jockey Club (HKJC) has made an application to the Betting and Lotteries Commission (BLC) to increase the number of international racedays simulcast into Hong Kong in 2021. The application is to increase the current quota by an additional 14 simulcast racedays with the majority of these to be in the hiatus between HKJC seasons through July – August each year.

The Moonee Valley Racing Club is one of Australia's leading thoroughbred racing clubs. We stage 23 race meetings each season, including the W.S. Cox Plate which is Australia's most prestigious thoroughbred race. We are also the premier night racing venue in Australia.

The Moonee Valley Racing Club has enjoyed a long and fruitful relationship with the HKJC. We view the HKJC as the world's leading racing jurisdiction, with high quality thoroughbred racing, world-class participants (horses, jockeys and trainers) and the most robust integrity model in world racing. The HKJC is to be congratulated on the way in which they administer and promote racing and for the relationships that they continue to foster around the world.

PRINCIPAL PARTNER

Ladbrokes

It is these international relationships which have significantly broadened the coverage and consumption of Hong Kong racing around the world through simulcast and co-mingling of wagering pools. These arrangements have strengthened the liquidity within domestic wagering pools and reduced the leakage to offshore illegal wagering operators.

The MVRC is supportive of this application from the HKJC to increase the number of international racedays simulcast. We hope that should this extension be approved Australian racing will benefit through an increase to the number of our racedays currently imported into Hong Kong.

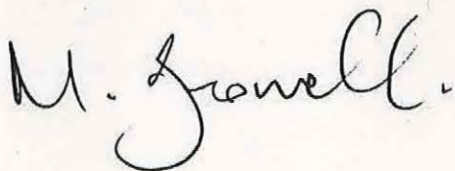
One of the key benefits of this application is that the additional racing product covered by this extension will generate significant wagering turnover through the HKJC, which in turn will reduce the opportunities for illegal wagering operators to attract Hong Kong punters. This additional wagering turnover will also increase the HKJC's taxation and community donations contributions. The wagering commission paid by the HKJC to international racing clubs staging these simulcast meetings is also an important source of revenue.

Additional Australian product into the Hong Kong market will also lead to greater awareness and interest in our racing, which can in turn lead to greater investment in Australian breeding and racing by members of the HKJC. Australia continues to provide a significant percentage of horses that are currently in training in Hong Kong, including recent Everest winner Classique Legend. Increased coverage of Australia racing into Hong Kong should benefit the two-way trade between our jurisdictions.

The MVRC hopes that the Betting and Lotteries Commission will look favourably on this application from the Hong Kong Jockey Club to increase the number of international simulcast racedays by an additional 14.

If you need to discuss this matter further, I can be contacted on

Yours sincerely

A handwritten signature in black ink, appearing to read "M. Browell". The signature is fluid and cursive, with a large, sweeping "M" and a long, trailing flourish at the end.

Michael Browell
Chief Executive Officer



音樂改變兒童 兒童創造音樂

Mr David Fong Man-hung, BBS, JP
Chairman, Betting and Lotteries Commission
13/F, West Wing,
Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong

11 November, 2020

By post and e-mail
hab3@hab.gov.hk

Dear Mr Fong,

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, Music Children Foundation's (MCF) comments are as follows.

Since MCF's inception as an NGO in 2013, we have been providing free music education programs to children below 16 from low-income families in Hong Kong where music is generally absent. We are very grateful that since September 2017, with the support of the Hong Kong Jockey Club Charities Trust (HKJCCT), MCF was able to expand beyond our base district, Shamshuipo, to a total of 11 service sites in 6 districts, and to have served to date around 5,000 students from less than 300 before HKJC's intervention.

Aside from the teaching of music, our programs emphasize on helping children build confidence, develop self-discipline and shape characters – attributes that will go a long way guiding the children towards adulthood. With the continual supports from HKJCCT, starting September 2020, we can now extend our services to graduates as well as parents of our students bringing the impacts of our mission to new heights.

We are in the best position to witness/demonstrate how lives can be touched and changed with better allocation of resources for charitable causes; and we believe it is a wise move to allow more channels for HKJC to solicit charitable donations while bringing in extra government betting duty, addressing the demand for horse racing during summer and helping to combat illegal gambling.

HKJC is certainly a top-notch organization that can truly and efficiently help fill the social gaps that the government is unable to fully cover by its own. The facts that simulcast has minimal effect on young people (less than 2% of simulcast bettors are aged between 18 & 21) and HKJC was awarded the Level Four RG accreditation further justify the huge net benefits to the society the additional simulcast days for HKJC will bring.

Yours sincerely,

Michael Leung
General Manager
Music Children Foundation Limited



By email : hab3@hab.gov.hk /post

19 November 2020

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

Dear Mr Fong,

New Zealand Thoroughbred Racing (NZTR) would like to support The Hong Kong Jockey Club's (HKJC) application for 14 more simulcast race days. We believe that offering fans a legal opportunity to wager over the summer break is a key to enhancing industry funding and boosting returns to government.

NZTR is the governing body of thoroughbred racing in New Zealand. Amongst NZTR's key responsibilities are the development and execution of the thoroughbred code's business plan, the setting of the prizemoney distribution policy, and the allocation of funds within the thoroughbred code to maximize and sustain financial benefit. NZTR also defines, regulates and amends the Rules of Racing for the thoroughbred code in New Zealand.

For many years, the racing and breeding industry in New Zealand has enjoyed a long and productive relationship with the HKJC. New Zealand is a major supplier of Hong Kong's racehorses, and has produced many top quality thoroughbreds which have raced with great success in Hong Kong. New Zealand also welcomes retired racehorses from Hong Kong at the end of their racing careers, where they often go on to a second career or fulfilling retirement.

NZTR, and our key stakeholders in New Zealand, are very supportive of all attempts to expand simulcasting and international wagering generally. Simulcasting of races boosts the international prestige of the sport of horse racing by exposing international fans to the best quality racing globally. It also helps smaller racing jurisdictions, like New Zealand, to connect with fans who may never have the opportunity to enjoy our fantastic racing in person. Importantly, simulcasting is mutually beneficial both for the jurisdiction whose races are being broadcast, and the foreign jurisdiction whose fans benefit from world-class entertainment, and whose governments and communities receive increased legal wagering turnover and higher tax contributions from racing.

Simulcasting and the racing ecosystem

The simulcasting of international races is playing an increasingly important role in sustaining the ecosystem of racing, especially by providing further funding to drive the continued success of our sport.

The more that fans engage internationally with our sport, the more funding the industry is ultimately likely to receive. Higher fan engagement often leads to higher turnover and therefore better returns to the racing industry, including in the form of prize money. In turn, higher prize money incentivises greater future participation in the racing ecosystem.

As a major breeder of top quality thoroughbreds, New Zealand benefits from the internationalisation of horse racing which results from the simulcasting of racing, putting our equine athletes on the world stage and driving demand for New Zealand-bred horses.

Hong Kong has a summer racing break starting from mid-July until the end of August, when the HKJC is not allowed to offer simulcast on many of the most prestigious overseas horse races. This means that customers in Hong Kong are not permitted to bet on some of the world's leading races. It also means that people in Hong Kong may be drawn towards illegal and offshore wagering channels which divert money away from governments and negatively impact funding for the racing ecosystem as a whole. Simulcasting has a key role to play in preventing this negative outcome.

Conclusion

NZTR strongly supports the HKJC's application to increase its simulcast race days. We believe that simulcasting is a key to enhancing the funding that sustains our industry.

Kind Regards



Bernard Saundry
Chief Executive



香港賽馬會增加同步聯播日的建議
16/11/2020 15:23

致: 博彩及獎券事務委員會
方文雄主席

方主席:

香港賽馬會聞名國際，在世界馬壇穩佔領導地位，然而賽馬發展卻因夏天「抖暑」，因而錯過了如本暑期間 行的英皇錦標、法國多維爾賽期及英國約克郡賽期等，根本就是每年夏季全球馬壇焦點。令人不明白的是國際間的主要馬場，全年均可跑馬及轉播賽事，為何香港轉播賽馬需要有限制呢？

本人有機會隨香港代表到外國馬場參觀賽事，親身感受到香港人對海外賽馬興趣濃厚，現時馬會建議放寬暑假轉播海外賽事，此舉確實在與時並進，除可令香港賽馬與全球馬壇接軌，更讓本地馬迷亦可繼續跟進海外頂級賽駒的表現，政府應積極考慮。

Ian Sham
Director of External Affairs
Racing World (賽馬天下)

Patron

The Honourable Mrs. Carrie Lam Cheng Yuet-ngor,
GBM, GBS
The Chief Executive

President

Anthony Chow, SBS, JP

Chairman

Thomas Yeung

Honorary Members

Ronald Arculli, GBM, CVO, GBS, OBE, JP
Vincent Cheng, GBS, OBE, JP
Bernard de Petrucci
Penny Smith
Tony Tyler
KK Yeung, BBS, JP, Grade of Knight of the Crown
(Belgium)

Voting Members Committee

John Slosar, *Chairman*
Philip Chen, GBS, JP
Peter Cheng
Ann Kwok
Joseph Kwok, RSW., PhD, JP, BBS
Justin Kwok
Eric Li, GBS, OBE, JP
Ronald Lo
John Ridley
Carlson Tong, SBS, JP
John Witt
Benson Wong
Peter Wong, JP
Jackson Woo
Silas Yang, JP
Thomas Yeung

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Anthony Chow, SBS, JP, *President*
Thomas Yeung, *Chairman*
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Amanda Bond
Wilson Li
Allen Shi, BBS, MH, JP
Patricia Yeung

Rehab Sub-committee

Jackson Woo, *Chairman*

PR & Fund Raising Sub-committee

Ronald Lo, *Chairman*

Riding for the Disabled Association Ltd

香港傷健策騎協會有限公司

HONG KONG



馳騁

25th November 2020

Mr. David Fong Man-hung, BBS, JP

Chairman

Betting and Lotteries Commission

c/o Home Affairs Bureau

13/F West Wing, Central Government Offices

2 Tim Mei Avenue, Tamar, Hong Kong

Dear Mr. Fong,

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

We are aware that the Betting and Lotteries Commission is currently considering the application of The Hong Kong Jockey Club ("HKJC") regarding the increase of fourteen simulcast days starting from 2021. Further to the request for views on the proposal, as stated on your website, I write in support of this initiative.

The Riding for the Disabled Association was established in 1975 with the support of HKJC. Our not for profit organisation aims to teach disabled children, as well as some adults to ride a horse to the best of their ability. Riding is widely recognized as one of the most beneficial forms of therapy a disabled person can receive. It builds self-confidence, improves concentration and communication, as well as bringing physical benefits.

Since our inception, HKJC has provided us with facilities and resources to enable our work. We started at the HKJC's Beas River Riding School before moving to our current home in Pokfulam Public Riding School in 1978. Our operation was further expanded when HKJC opened our second facility at Tuen Mun Public Riding School in 1994. Today we provide 4,500 rides per year, benefiting

Patron

The Honourable Mrs. Carrie Lam Cheng Yuet-ngor,
GBM, GBS
The Chief Executive

President

Anthony Chow, SBS, JP

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Ronald Lo, *Chairman*

Riding for the Disabled Association Ltd

香港傷健策騎協會有限公司

HONG KONG



馳騁

over 600 physically and mentally impaired individuals from 28 special schools and organisations. This work would not be possible if it were not for the Hong Kong Jockey Club.

In addition to providing stables and access to riding arena space, HKJC provides us with logistical support such as veterinary and farriery care, along with equestrian expertise. Furthermore, the Hong Kong Jockey Club's Charities Trust provides funding to support certain of our operating cost. For the current three year period this donation is \$20.14 million and since 1994 the Trust has donated a total of \$89 million.

Without the support from HKJC and its Charities Trust, our work would simply not be possible. Therefore, we fully support the Club's initiative to increase the number of simulcast days which will generate additional revenue and ultimately sustaining its charitable donations to social organisations such as ours. The demand for horse riding rehabilitation services have been increasing in Hong Kong,

HKJC is not a commercial body, but a responsible social organisation which has been a staunch charitable donor in the past decades; we hope that the Betting and Lotteries Commission would give favorable consideration to HKJC's proposal to enable HKJC to operate on a sustainable basis.

Yours sincerely,

Thomas Yeung
Chairman



Addition Simulcast Days
27/11/2020 15:20

To Mr David Fong Man-hung,
BBS, JP, Chairman, Betting and Lotteries Commission

Dear Mr. Fong,

I am writing in support of the proposal to allow Hong Kong Jockey Club to increase the simulcast days and allowing them to be scheduled during the summer. I think the additional betting days do not seem like an added stress on the current system and the benefits of additional revenue and curbing illegal gambling far outweigh any risk of adding betting days to the calendar.

The Jockey Club Charities Trust funds such important projects throughout Hong Kong. As a charitable organization which benefits from their funding, making this small change to the betting calendar will divert money that is currently being spent illegally through legal channels which ultimately will benefit the greater public good.

Additionally, it would be great if the Charities Trust would consider funding projects beyond just those benefitting Hong Kongers and perhaps revenue generated from the additional simulcast day for international races could be mandated for charitable causes outside the scope of Hong Kong. As one of the largest charities in the world, there is an opportunity for the Trust to play a philanthropic leadership role internationally. There is no shortage of worthwhile projects that may extend beyond Hong Kong.

For example, currently no funding is allowed to go towards programmes benefitting domestic helpers. Yet given that domestic helpers play a vital role in both the Hong Kong economy as well as the impact they have on most Hong Kong families, it would be in the best interest of Hong Kong if this was a well-trained and engaged work force.

Perhaps there is a creative opportunity to consider how this additional betting revenue may be best used to expand the role of the Charities Trust internationally and consider projects that benefit the region, which ultimately helps Hong Kong.

Sincerely,

Libby

Libby Alexander 艾俐碧

Executive Director & Co-Founder 執行董事及聯合創辦人
Splash Foundation Limited

Annex II

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

I, on behalf of St. James's Settlement, support HKJC's initiative in increasing the number of simulcast days.

As a social service organization, we will be pleased to see additional job opportunities to be created for local community, especially when many became unemployed and youth faces difficulties in job seeking because of the COVID-19 pandemic, which has no end in sight.

Furthermore, the substantial community revenue to be generated by the proposed simulcast days will imply an increase in donations to the HKJC Charities Trust. It will be appreciated if charitable organizations could have more resources and chances to get support for various social services and projects to serve those in-need in the society.

Name : Josephine Lee Yuk Chi

Representing organisation (if applicable) : St. James' Settlement

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

2 November 2020

Mr David Fong
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau of the HKSAR Government
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

SUPPORT FOR NEW SIMULCAST RACE DAYS

Dear Mr Fong,

For almost two decades now, Tabcorp and the HKJC have enjoyed a close relationship, with Tabcorp being responsible for the international broadcast of HKJC racing in Australia through our subsidiary, Sky Racing.

The HKJC continues to lead the way in the promotion and development of thoroughbred racing. On the world horse racing stage, the HKJC is recognised for its professionalism, integrity and its substantial community contribution to the people of Hong Kong.

It is understood that the Hong Kong Government is currently considering an application from the HKJC to increase the number of simulcast days, most of which will be allocated in July and August. Racing fans in Australia, and many other countries, enjoy watching the racing events throughout the year, HKJC's proposal would enable Hong Kong residents to watch more high-quality racing events from around the world whilst also supporting their favourite horses and jockeys competing overseas.

Tabcorp, through Sky Racing, gives residents in Australia the opportunity to watch international thoroughbred racing each day from around the world. Over 17,000 thoroughbred races are shown by Sky Racing in Australia through retail betting shops, licensed venues, racetracks, pay tv at home and mobile applications.

We fully support the application by the HKJC for the additional simulcast race days.

Such race days would provide the opportunity for residents of Hong Kong, to enjoy quality thoroughbred racing including races from Australia, which is of the highest standard.

Yours sincerely



David Attenborough
Managing Director Tabcorp



The British
Chamber of Commerce
in Hong Kong
香港英商會

Mr David Fong Man-Hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F West Wing, Central Government offices
2 Tim Mei Avenue, Tamar

12 November 2020

Dear Mr Fong,

Re: Proposal of Increasing the Number of Simulcast Days Consultation

As the Executive Director of the British Chamber of Commerce in Hong Kong, I am writing to you to express our organisation's support for the Hong Kong Jockey Club's "Proposal of Increasing the Number of Simulcast Days" which is currently under consultation by the Home Affairs Bureau.

We believe this would be a positive step forward and would welcome the opportunity it affords to showcase additional international racing, including eight premier British racing meetings from Ascot, Goodwood and York racecourses, to horseracing fans in Hong Kong.

This will be of great benefit to Hong Kong and Great Britain and allows further opportunity to develop World Pool events and joint initiatives to grow betting on horseracing and increase its global fan base. It also supports the Hong Kong Jockey Club's efforts to minimise illegal betting in the region.

World Pool – international commingling between the Hong Kong Jockey Club, the UK Tote and other leading racing nations - has already proved a great success at Royal Ascot in 2019 and 2020. It has seen pool betting on the five-day race meeting grow from £19 million in 2018 to £92 million in 2019 and then £137 million (\$170 million) this year. World Pool was also introduced for British Champions Day at Ascot last month which is another welcome development.

The deepening partnership between the Hong Kong Jockey Club and the UK Tote Group is a success story which can continue to benefit horseracing in Hong Kong and Great Britain.

With my best wishes.

Yours sincerely,

David Graham
Executive Director



香港公益金
THE COMMUNITY CHEST

27 November 2020

By fax and e-mail

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

Attention: Mr David Fong Man-hung, BBS, JP – Chairman, Betting and Lotteries Commission

Dear Sir/Madam

We are writing in support of the Hong Kong Jockey Club's proposal of increasing the number of simulcast days.

The Community Chest of Hong Kong is privileged to have been a beneficiary of the Hong Kong Jockey Club (HKJC) since 1993. For the past 27 years, HKJC has been making an annual contribution to the Chest, from the admission fee income of race meetings, designated towards defraying our central administration expenses. The designated purpose has helped the Chest in living up to its pledge of allocating 100% of donations received to member agencies and its service users without deduction of central administration expenses.

In addition to its annual contribution, HKJC has made another generous gesture to the Chest in 1999 by purchasing a prime office premise to let it out to the Chest for usage at a nominal rent of HK\$1. This arrangement has allowed the Chest to work for the well being of millions in Hong Kong without rental burden.

During these unprecedented times of Hong Kong, the HKJC's ability in continuing stable funding to the social welfare sector is even more critical to the community as many NGOs and organisations depend heavily on their support during times of economic stress as well as with the current threat of COVID-19.

...P.2



Page 2

Betting and Lotteries Commission Secretariat

The HKJC is a passionate and committed partner to the social welfare sector and we believe that its' proposal to increase simulcast days could help to sustain its charitable contributions to Hong Kong in the long run.

The Chest is proud to have been associated with HKJC as a partner in charity and looks to continuing the collaboration in helping many more people in the years to come.

For and on behalf of
The Community Chest of Hong Kong

Cecilia Li
Chief Executive



Director: Professor Adrian Walter AM 校長：華道賢教授 AM

25 November 2020

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

Dear Sirs,

**Proposal of Increasing the Number of Simulcast Days
Submitted by the Hong Kong Jockey Club to the HKSAR Government**

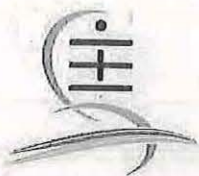
On behalf of the Hong Kong Academy for Performing Arts, I write to support the Proposal of Increasing the Number of Simulcast Days submitted by the Hong Kong Jockey Club (the Club) to the HKSAR Government.

Through its Charities Trust, the Club has been the most valued benefactor of the Academy. The establishment of the Academy in 1984 was made possible with the generous donation of HK\$300 million from the Club in celebration of the Club's 100th Anniversary. Over the past 36 years, the Academy has been receiving the continued support from the Club for our ongoing development, including the construction of Hong Kong Jockey Club Amphitheatre, the Hong Kong Jockey Club Millennium Studios and the enhancement of Dance Studio 1. The Club has also given out The Hong Kong Jockey Club Scholarships annually which has accumulated to over HK\$16 million to support outstanding Academy students.

The Club has provided important support to the development of the Academy as well as the arts and culture in Hong Kong. It is important that the sustainable development and future success of the Academy that the Club's Charities Trust can continue to support our projects so as to benefit the greater community in Hong Kong.

Yours faithfully,

Professor Adrian Walter AM
Director



26 November 2020

會長
President
林建康
Matthew K.H. Lam

副會長
Vice Presidents
陳湛文
Simon C.M. Chan
賽事委員會
Racing Committee

孫騰章
Brian Sun
康樂活動委員會
Social Committee

鄧偉業
Leslie W.Y. Tang
慈善委員會
Charity Committee

曾炳威
William P.W. Tsang
會員事務委員會
Membership Committee

秘書(行政事務)
Hon Secretary-Admin.

鞠祿龍
Lawrence L.L. Kook

秘書(賽馬事務)
Hon Secretary-Racing

馬博文
Josiah P.M. Ma

義務司庫
Hon Treasurer

蕭劍平
Edmond K.P. Siu
財務委員會
Finance Committee

理事
Council Members

陳國聰
Philip K.C. Chan

陳德華
Richard T.W. Chan

許穎嘉
Candy W.K. Hui

郭浩泉
Patrick H.C. Kwok

羅揚駿
Ronald Y.C. Lo

蕭煒忠
Danny W.C. Siu

曾向得
Raymond H.T. Tsang

王經緯
Kirk K.W. Wong

王文揚
Ryan M.Y. Wong

王賢訊
Vincent Y.S. Wong

楊存洲
Thomas C.C. Yeung

Mr David Fong Man-hung, BBS JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F, West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar
Hong Kong

Dear Mr Fong

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

We are aware that the Betting and Lotteries Commission is currently considering the application of The Hong Kong Jockey Club ("HKJC") regarding the increase of 14 simulcast days with these to be held during the summer each year starting from 2021.

As a critical stakeholder in Hong Kong racing, we hope that The Hong Kong Racehorse Owners Association Limited ("HKROA") can offer our views for the Commission's consideration.

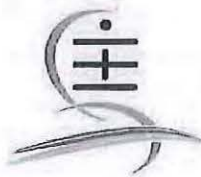
The HKROA was established in 1978 and is the formal body representing the owners of racehorses in Hong Kong. The HKROA exists for the benefit of its members and to promote horse ownership in Hong Kong under the Rules of Racing of the HKJC.

The aims of the HKROA are to provide a forum and a conduit where owners may raise issues, discuss and pass comments on all matters relating to horse ownership in Hong Kong and those of mutual concern with the HKJC.

Owners in Hong Kong are fortunate to race our horses in one of the most respected horseracing jurisdictions in the world. The HKJC's operations are world-class and the HKJC is so well known for its uncompromising approach to integrity and commitment to the betterment of Hong Kong society. The HKJC is also known for the competitiveness of the racing it conducts which is certainly up with the best in the world.

Hong Kong owners invest significantly to source the highest quality horses 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.

We are so proud that Hong Kong racing is amongst the best in the world. There is no doubt that a significant driver of Hong Kong's success is the excellent prize money available in our local racing. We are very keen to ensure that prizemoney remains competitive with the leading racing jurisdictions – this will surely support the future success of our sport in Hong Kong by guaranteeing returns to owners into the future.



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 and experience glorious moments by winning prestigious races in overseas jurisdictions. Up until today, Hong Kong horses have started 326 times in overseas races, with 36 of those being winners. We believe that more simulcast races will not only lead to our owners enjoying the best of world racing during the summer break, but also will encourage some of our great horses to race overseas and lift the reputation of Hong Kong racing even higher.

Many of Europe's premier races are held over July and August – the same time that Hong Kong has our summer break from racing (which is a break due to restrictions imposed by the government licensing condition). There are many positives that could come from granting Hong Kong fans access to legal simulcasts of these top races during this time. As owners, we would love to watch and wager on these races, including some in which our Hong Kong-based horses, owners and jockeys may participate in.

In our view, it is necessary to reward and encourage our owners and also to ensure Hong Kong's elite races are attractive to overseas competitors. This approach has been a core element in Hong Kong being able to maintain its position as a world leader in providing quality horseracing and has enabled us to achieve world-class racing. We see that by creating another revenue source during the off-season, this may be used to ensure prizemoney levels are stronger for longer. Of course, additional revenue would also go towards the outstanding charitable efforts which the HKJC is responsible for and contribute so much to Hong Kong. It is naturally important that wagering on simulcast overseas races during the summer is legal for our owners and fans in Hong Kong – this means the revenue goes to the HKJC to responsibly distribute and to avoid it be gone to illegal operators which contribute nothing.

Based on above matters, we sincerely hope the Commission would take the HKJC's proposal into consideration.

Yours faithfully
By order of the Council



Matthew K.H. Lam
President

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

We support the Hong Kong Jockey Club's proposal to increase the maximum number of simulcast days to a maximum of 37 days a year and to allow the simulcast days to take place during the summer break as from 2021 in order to combat illegal betting of Overseas Horseraces in Hong Kong during summer break when there are no local horseracing.

For gamblers, gambling is habitual. When there is no local horse racing take place in summer, they will still look around to see if there are any other gambling opportunities to fulfil their psychological need. As a welfare NGO, we do not want to see an increase in the number of gamblers, however, we are more reluctant to see that there are illegal and offshore betting going on without proper control and scrutiny. This would of course create much more family and delinquent problems. Besides, noting that the Hong Kong Jockey Club has been donating a big portion of its operating surplus to the Jockey Club Charities Trust and supporting the Lotteries Fund via government betting duty, it is a major funder of most charities and welfare projects sustaining the social and economic development in Hong Kong. The increase of its revenue via additional simulcast betting will be of benefit to the Hong Kong society at large.

Name : Maureen Tam

Representing organisation (if applicable) : The Hong Kong Society for the Blind

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



maintaining the integrity of the sport of horseracing

16 November 2020

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
c/o Home Affairs Bureau
13/F., West Wing, Central Government Offices
2 Tim Mei Avenue
Tamar, Hong Kong

By email : hab3@hab.gov.hk

Dear Mr Fong

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 days by 14, with many of those days to be implemented during the summer each year starting from 2021.

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 recognised 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. 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 February 2020. 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 capitalise 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 during July each year. We believe that the off-season in Hong Kong is an ideal time to bring top-class international races to the Hong Kong fans, and would be a welcome opportunity to further advance the internationalisation of racing in a productive manner with leading racing jurisdictions around the world.

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.

Conclusion

As explained above, the NHA considers that there are a multitude of positives to come from enhancing simulcast opportunities in Hong Kong during the summer break. We would welcome the opportunity to expand on any of the matters above, and hope that the Commission will look favourably upon the HKJC's application.

Yours sincerely



Susan Rowett
Chairperson



Vee Moodley
Chief Executive



OFFICE OF THE CHAIRMAN

25 November 2020

Mr David Fong Man-hung, BBS, JP
Chairman
Betting and Lotteries Commission
C/- Home Affairs Bureau
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue
TAMAR HONG KONG

Via email: hab3@hab.gov.hk

Dear Mr Fong

I am writing to you in support of The Hong Kong Jockey Club's proposal to increase the number of simulcast racedays during the Hong Kong Summer break commencing in 2021.

The HKJC is a world leader in horse racing and horse racing administration. They conduct a number of key international race meetings throughout its racing season that are of global significance.

The Victoria Racing Club Ltd (VRC) based in Melbourne, Australia conducts the Group 1 Lexus Melbourne Cup on the first Tuesday of November each year. This is one of the leading international races in the world, with prizemoney of AUD\$8 Million and participation from many overseas countries. In the past ten years this has included England, Ireland, France, Germany, Dubai, Japan and Hong Kong.

The growth of international racing is extremely important to all jurisdictions generating significant economic benefit, through international tourism visitations, hospitality, and revenue via wagering activities. It is also important for the development of relationships between racing clubs both domestically and internationally.

As the horse racing industry grows globally it is very important that all jurisdictions can participate and watch racing from around the world. In Australia we have the advantage of being able to access, and wager on racing from racing jurisdictions worldwide. This has many benefits including financial, growth of fan bases, as well as administrators being able to monitor racing developments around the globe.

In closing, I would therefore like to strongly support the HKJC proposal for the increase in the number of simulcast race dates during the Hong Kong Summer period.

Please do not hesitate to contact me if you require any further information on this important matter.

Yours sincerely



Neil Wilson
CHAIRMAN

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

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

As a leading conservation NGO WWF recognises the commitment of HKJC in providing charitable support to programmes across Hong Kong. The proposal to extend the HKJC operations and therefore provide increased resources to support community initiatives is supported. HKJC enables us to connect our community with nature, making nature accessible to all.

Name : Peter Cornthwaite

Representing organisation (if applicable) : World Wide Fund for Nature Hong Kong

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



大角咀區民生關注會

致博彩及獎券事務委員會秘書處

有關「香港賽馬會增加同步聯播日」之意見

大角咀區民生關注會(下稱「本會」)現就「香港賽馬會增加同步聯播日」表達意見，供貴會參考。

本會成立於1988年，至今已超過三十年，會員超逾4000人，是一個紮根於大角咀的地區註冊社團。本會一直秉承「關注民生，服務社群」宗旨，致力宣揚鄰舍互助精神、發揮居民才能，建立鄰舍間的合作，培養大角咀居民守望相助、回饋社區的精神。

本會向來關注區內民生問題，積極收集居民意見，並向有關部門反映。非法賭博問題近年備受社會關注，有報導指，有非法經營網上賭博及清洗黑錢的犯罪集團，曾租用本區內的住宅單位作為投注中心，提供包括體育賽事、賽馬及網上賭場等非法賭博服務，問題猖獗。部分地區的長者或家庭主婦，更曾被不法之徒以各種優惠訊息誤導，參與外圍賭博，損失慘重。

本會相信，適當增加合法投注渠道，有助打擊不法之徒，減少非法外圍賭博，同時可為社區創造更多就業機會，改善就業情況，振興深受疫情打擊的經濟環境。

順祝 工作愉快！

大角咀區民生關注會



2020年11月16日



檔案編號：

來函編號：

博彩及獎券事務委員會

方文雄主席：

回應有關增加海外賽事轉播的公眾諮詢

大埔區文藝協進會創辦已四十載，素以促進大埔區文化藝術推展工作，提高區內各界人士對文藝之興趣為己任，組織各項文藝訓練與活動，藉以改良社會風氣，培養居民高雅情操。

香港賽馬會作為全港最大的慈善機構，歷來贊助不少文化藝術項目，以豐富市民生活內涵和提高文化素養。本會知悉，馬會正向政府申請增加轉播海外賽事，以期將流向非法賭博的社會資源納入正軌，倘若有關申請獲當局審批，料可為政府庫房帶來額外穩定收入，同時亦會增加馬會的營運收益。

文化藝術兼具陶冶性情，促進居民身心健康和建構和諧共融社區的功能，本會相信，馬會透過增加轉播賽事以提高收益的同時，將繼續秉持企業社會責任，積極投入公益事業，投放更多資源予文化藝術推廣工作，惠澤社群。

大埔區文藝協進會主席

林廣輝



林廣輝

二零二零年十一月十六日



音樂委員會
舞蹈委員會
戲劇委員會
文娛康樂委員會
會所管理委員會



北區體育及文化推廣協會

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主席
方文雄先生, BBS, JP

尊敬的方主席：

就馬會增加同步聯播日建議提交意見

北區體育及文化推廣協會於2009年成立，致力推動北區的康樂、體育及文化活動，從而提升居民的生活質素及促進社區和諧。

本會知悉馬會在運動推廣方面不遺餘力，除支持精英運動員培訓，亦鼓勵全民運動，贊助包括全港運動會及青少年足球發展計劃等活動。在地區層面上，馬會慈善基金撥款資助興建鳳溪室內游泳館，以紓緩北區泳池短缺，同時亦支持本會所舉辦的北區豐盛人生健樂長跑比賽，每年吸引逾二千人參與，成為北區體育盛事。

根據馬會就增加聯播日所提交的理據，若增加同步聯播，可為資深賽馬愛好者提供合法投注渠道，對年輕人影響微，理由是過去參與聯播人士約八成以上為中、老年人士。本會相信馬會在增加聯播日之餘，有能力投放更多資源於社區，減少問題賭博情況，並透過持續推廣普及運動，促進市民身心健康。

順祝工作愉快，事事順遂！

此致



侯耀忠

北區體育及文化推廣協會主席

2020年11月18日

同心網絡 2G[♥]THER

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

敬啟者：

有關「香港賽馬會增加同步聯播日的建議」之意見

作為成立於2010年的非牟利團體，同心網絡以中西區為中心，以四大方向：「社會服務、關愛社區、環保教育、文化推廣及公民教育」為發展主軸，致力凝聚青少年以推動社區發展。我們明白「受人以魚，不如授人以漁」的道理。因此，服務大眾之餘，更提供一個多元化平台讓青少年發展所長，培養個人發展同時回饋社會。


我們留意到馬會最近向政府建議增加在非本地賽馬日同步聯播非本地賽事的日數，由現時23日增加至37日，並希望於明年歇暑期間落實。就此，我們有以下意見。

首先，博彩及獎券事務委員會應該考慮有關建議是否對年輕人帶來負面影響。馬會在建議中提到：「多數參與同步聯播非本地賽事的投注人士為年滿四十歲或以上，年齡介乎十八至二十一歲人士只佔1至2%」，並指出年輕投注者的比例在過去數年亦維持不變。馬會更強調，賽馬投注需要投放大量心機研究馬匹及騎師的表現，對大多數本地年輕馬迷並不吸引。就此，我們的理解是，年輕人並非馬會是次建議的目標參與者，即使建議獲批，相信對年輕人影響輕微。

再者，每年七、八月是年輕人最為忙碌的日子，家長亦忙於為子女安排適合的暑期活動，由參與義務工作以至不同的興趣班，本機構亦曾於去年暑假舉辦「足動傳情2019」的活動，年輕人積極參與，反應非常熱烈。因此，我們相信年輕人沒有多餘的精力在暑假期間參與投注新增的同步聯播賽事。相反，我們認為，有關建議有助打擊非法及離岸莊家利用香港馬季歇暑期間，鼓吹投注者利用非法賭博平台作外圍投注，繼而進一步打擊非法及離岸莊家的投注收入，改善整體社會秩序，亦間接為年輕人創造良好的發展環境。

我們期望，馬會可以將新增同步聯播日的收入，透過馬會慈善信託基金捐出更多款項，繼續推動慈善工作，發展更多適合年輕人的活動，惠澤社羣。

此致


同心網絡總監
李偉強



2020年11月20日

附件二

香港賽馬會增加同步聯播日的建議

對於馬會建議把每年同步聯播日的上限增加14日，並由2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本人/機構意見如下：

個人明白暑期間不能舉行本地賽馬，但考慮到夏日炎炎，特別是在疫情之下，香港不少馬迷必定更感苦悶。透過轉播海外大賽，不但不會加重賭困，反而可以令一羣馬迷特別享受一輩，在暑期間亦有一點甜酸，這對一羣馬迷的心理有著重要作用，以免他們無所事事。

除此之外，作為賽馬電台視窗的台長，我們亦希望暑期間能有較豐富的賽馬節目，轉播海外大賽，一來對稅收、慈善也有裨益，而且亦讓本港馬迷有機會欣賞歐洲的大賽，可說是一舉多得，我們亦會鼎力支持！

姓名：KONG YIK FAI
所屬機構（如適用）：有線

註：請細閱後頁個人資料收集聲明。

HKCO/ED/023/2020

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

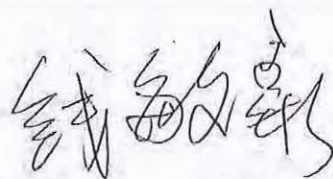
敬啟者：

關於香港賽馬會增加同步聯播日建議

香港中樂團對於香港賽馬會建議把每年同步聯播日的上限增加 14 日，並由 2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，香港中樂團認為此方案可行。

受 2019 冠狀病毒病疫情影響，百業蕭條，失業率亦大大提高。香港賽馬會於馬季歇暑期間進行同步聯播，能額外創造不少就業機會，有助紓緩受 2019 冠狀病毒病疫情影響而日趨嚴峻的失業情況和經濟壓力，惠及民生。另外，這亦會為香港賽馬會帶來額外收入，除可繼續貢獻政府博彩稅收，更可贊助非牟利團體作更多慈善用途，維持對社會及慈善貢獻。

順祝 安祺！



香港中樂團行政總監 錢敏華

2020 年 11 月 10 日

名譽贊助人
THE HONORARY PATRON
香港特別行政區行政長官
林鄭月娥女士 CHAN GBS JP
THE CHIEF EXECUTIVE, HKSAR
THE HON MRS CARRIE
LAM CHENG YUET-NGOR GBS JP

首任主席 FOUNDED CHAIRMAN
徐尉玲博士 BBS MBE JP (2001-2006)
DR. CARLYE W. L. TSUI BBS MBE JP

前任主席 FORMER CHAIR
黃天指博士 JP (2006-2008)
DR. KELVIN T. Y. WONG JP
賴顯榮律師 (2008-2009)
MR. HENRY H. W. LAI
徐尉玲博士 BBS MBE JP (2009-2015)
DR. CARLYE W. L. TSUI BBS MBE JP

理事會 COUNCIL
主席 CHAIRMAN
李偉強先生
MR. RICKY W. K. LI

副主席 VICE-CHAIRMAN
陳偉佳博士
DR. BENJAMIN W. K. CHAN
賴顯榮律師
MR. HENRY H. W. LAI

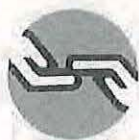
司庫 TREASURER
陳心愉女士
MS. BONNIE S. Y. CHAN

義務秘書 HON. SECRETARY
陳永華教授 JP
PROF. CHAN WING WAH JP

理事 MEMBERS
黃家倫先生
MR. ALAN K. L. WONG
胡錫恒先生
MR. WOO KING HANG
廖錦興博士
DR. BOBBY K. H. LIU
范駿華先生 JP
MR. ANDREW C. W. FAN JP
林李婉冰女士 MHI
MRS. NINA Y. B. LAM MHI
黃舒明女士 MHI
MS. WONG SHU MING MHI

藝術總監兼終身指揮
ARTISTIC DIRECTOR AND
PRINCIPAL CONDUCTOR FOR LIFE
閻惠昌教授 SBS
PROF. YAN HUI-CHIANG SBS

行政總監
EXECUTIVE DIRECTOR
錢敏華博士
DR. CELINA M. W. CHIN



香港善導會
The Society of Rehabilitation and
Crime Prevention, Hong Kong

贊助人
終審法院
馬道立首席法官, GBM
PATRON
The Hon Chief Justice
Geoffrey MA, GBM
會長
彭鍵基博士, SBS
PRESIDENT
Dr PANG Kin-kee, SBS
主席
李滄良法官
CHAIRPERSON
The Hon Mr Justice Patrick LI
總幹事
李淑慧女士
CHIEF EXECUTIVE
Ms Anthea LEE Shuk-wai

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
方文雄主席

尊敬的方主席：

就香港賽馬會增加同步聯播日
香港善導會意見書

就有關香港賽馬會向政府建議把每年同步聯播日的上限增加 14 日，本會對從以增加慈善捐款、增加博彩稅收益和增加就業機會幾方面考慮，這建議是可行。

此外，一直以來本會沒有就關於嗜賭會友的求助數據、個案評估作有系統的研究，也沒有馬季歇暑期間的犯罪率資料，因此本會認為從防止犯罪的角度，未有數據顯示增加同步聯播日會對犯事有什麼直接影響。

總幹事

李淑慧謹

二〇二〇年十一月二十六日



香港賽馬會增加同步聯播日的建議

對於馬會建議把每年同步聯播日的上限增加14日，並由2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本人/機構意見如下：

- 1) 本會信任香港賽馬會及香港科技大學的分析，並支持相關建議。
- 2) 本會從累積工作經驗所得，確信賽馬會並非吸引本地青年人的賭博/運動選項，而未成年的少年兒童所受影響更少。
- 3) 本會同意社會各界需同心合力打擊非法外圍及網上賭博。
- 4) 作為受惠機構，本會歡迎香港賽馬會透過增加賽事以增進收益及慈善開支，以惠澤更多社會上有需要支援的市民。

姓名： 梁偉權 (總幹事)

所屬機構（如適用）： 香港遊樂場協會

註：請細閱後頁個人資料收集聲明。

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博彩及獎券事務委員會

方文雄主席

香港賽馬會華人職工會對於是次香港賽馬會增加同步聯播日的建議表示支持，原因如下：

在過去一年新型冠狀病毒期間，受疫情影響，投注站被迫關閉、賽馬只可閉門作賽，直接令到員工的薪金受影響，雖然馬房及全職員工所受影響較少，但不少兼職員工因工作時數減少有所影響。目前疫情雖然開始緩和，但仍有零星的確診個案，相信此情況亦會持續一段長時間，如能增加同步聯播海外賽事，某程度上可以分散馬會的經營及收入風險，為馬會提供另一個收入來源，不單將為員工帶來更穩定的工作機會及收入，更能增加博彩收益，最終亦是回饋社會，造福香港。因此政府應該從增加公共資源、政府財政收入的角度出發，考慮馬會提出的方案。

以往歇暑期間本地馬迷因馬會未能提供合法投注途徑而轉投非法賭博平台下注，如將來能於歇暑期間聯播海外賽事，對一眾馬迷來說亦是一大喜訊，不但能提供合法平台投注，更能為大眾提供娛樂節目，於閒時消磨時間，動動腦筋，本地馬迷亦可以增加對海外馬匹和騎師的認識。同時鼓勵香港的馬主派出馬匹到海外參賽，增加香港和國際賽馬業界的交流和聯繫，我們亦樂見每年國際賽事日，海外的頂級馬匹來到沙田馬房準備參賽，讓香港賽馬事業可以繼續發展下去。這樣對一眾馬房員工來說是莫大的支持和鼓勵，更是肯定我們對社會的貢獻。

基於上述原因，香港賽馬會華人職工會表示支持香港賽馬會今次就賽馬活動提出的建議。



香港賽馬會華人職工會

主席 黃永傑

二零二零年十一月十七日



香港賽馬會僱員工會

Hong Kong Jockey Club Staff Union



博彩及獎券事務委員會

主席

方文雄先生, BBS, JP

香港賽馬會(下稱馬會)與香港賽馬會同事(下稱同事), 尤如唇齒相依的關係, 惟香港經濟被往年的社會事件嚴重打擊, 再加上年初的新型冠狀病毒令大部份行業活動停止運作, 以致失業人數由 2020 年 1 月份政府公布的 124,000 人, 上升一倍至 10 月份公布的 259,800 人, 增加了 135,800 人。無奈地, 以上情況不單直接影響馬會的投注額, 而且更直接影響了馬會同事的收入。

香港賽馬會僱員工會(下稱工會)大部份同事都屬於電話投注及現金投注部門, 並以時薪形式被僱用, 故屬於「手停口停」的工種。不少前線同事, 由 2019 年 6 月出現社會動盪開始, 不少現金投注處被迫關門, 而有些電話投注中心亦由於鄰近衝突的地點附近, 公司為了員工安全著想, 亦被迫關門。再加上, 今年的經濟下跌, 馬會的投注額亦有所下降, 不少前線同事的收入大受影響, 故很多同事正如其他香港的打工仔一樣, 與公司共渡事艱。

如公司承蒙 貴委員會通過獲得新增同步聯播 14 日賽事, 不單可增加現職同事的工作機會, 直接增加收入, 更可為現正缺乏資源的社福機構增加資助, 故本會對馬會一舉兩得的建議表示歡迎, 並希望 貴委員會儘快通過有關建議申請。



香港賽馬會僱員工會

2020 年 11 月 16 日

香港賽馬會增加同步聯播日的建議

對於馬會建議把每年同步聯播日的上限增加 14 日，並由 2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本人/機構意見如下：

本人代表香港賽馬會職員聯誼會對於今次馬會就增加同步聯播海外賽事日之建議表示支持，原因有以下幾點：

在這困難的一年，社會上各行各業都受到新型冠狀病毒不同程度的打擊，失業率上升，我們期望馬會可以開拓收入來源以保就業。事實上，受疫情影響，馬會上一季收入亦相應下調，包括本地賽馬、足球和六合彩，故此同步聯播海外賽事，某程度上可以分散馬會的經營及收入風險，提供另一個收入來源。馬會不是商業機構，即使可下注的賽馬場次增加了，而令博彩收益有所提升，自然都會為政府帶來可觀的稅收進帳，最終亦是回饋社會，有助慈善活動和貢獻於社區服務、造福香港。馬會能夠利用額外收入，翻新已經陳舊的設施，進一步提升員工的工作環境，改善培訓員工所需資源，員工亦能從中受惠。

另外，由提供了認可和受到規管的博彩活動給大眾，對社會也會有好處，相信相當程度都會減低一些不受規管的賭博活動所帶來一連串的社會問題，例如欺詐、未成年人士參與賭博、高利貸等。在於滿足市民龐大和持續的需求，減低他們轉向非法的經營者下注而觸犯香港法例。

最後，馬會現時有超過二萬名兼職及全職員工，馬會能夠轉播更多賽事，將為員工帶來更穩定的工作機會及收入，尤其兼職員工主要在有賽事的日子上班，例如電話投注部和場外投注處等，她們大多數都是收入不多的學生、家庭主婦和待業人事等等，如建議獲得接納，相信除馬迷外，最開心的一定是這班兼職員工，因為可以有機會於多賺幾百元工資幫補生活費或學業上的開支。由於兼職同事增加了上班日數，本職員聯誼會於舉辦一些優惠活動時，可以即時向這班兼職同事作出推廣，並且能夠因應會員的反應而作出相關配合和安排，構建一個和諧、開心的工作間。基於上述所考慮的因數，本人謹代表香港賽馬會職員聯誼會表示支持香港賽馬會建議增加同步聯播海外賽事日。

對於馬會建議把每年同步聯播日的上限增加14日，並由2021年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本人/機構意見如下：

姓名

： 林德成先生

所屬機構（如適用）

： 香港賽馬會職員聯誼會主席

如有需要，可另加紙張申述意見。

除非事先表明不可公開意見書，否則秘書處可將接獲的意見書及諮詢會內容公開讓傳媒和公眾閱覽。

* 請刪去不適用者

個人資料收集聲明

公眾人士按本表格提供的個人資料，純屬自願性質。任何個人資料只會作博獎會就馬會增加同步聯播日的建議了解公眾人士的意見之用。如有需要，收集所得的意見書及個人資料，或會轉交有關的政府決策局或部門作處理馬會的建議之用。

秘書處可能會將收集到的意見書公開予傳媒和公眾閱覽。如你不欲公開姓名／所屬機構的名稱及／或你的意見，請在意見書中表明。

如擬查閱或更正意見書上的個人資料，請以書面形式向秘書處提出。



香港賽馬會騎練協會

THE HONG KONG JOCKEY CLUB HORSE TRAINING STAFF ASSOCIATION

博彩及獎券事務委員會

方文雄主席

本人代表香港賽馬會騎練協會對於是次香港賽馬會增加同步聯播日的建議表示支持，原因如下：

現時香港賽事於世界各地均有播放，海外賽馬業界和外地馬迷對香港賽事認識越來越多，相對上香港馬迷能夠循馬會這個正規渠道觀賞海外賽事的機會，受限於現時的轉播日數限制，相對較少。作為一個擁有超過三十年經驗的賽馬從業員協會，我們都希望香港賽馬事業可以持續地發展下去，如果能夠讓香港馬迷多些觀賞海外賽事，對於推動整個業界發展亦會有相當裨益。很多人都對賽馬有誤解，而事實上賽馬不可只以賭博角度來看，它是一項娛樂，更是一項運動。正如現時各式各樣的足球聯賽播放，能為足球發燒友提供娛樂。如馬會能聯播更多海外的精彩賽事，定能推動賽馬業發展，加強競爭力，擴闊賽馬愛好者視野，令賽馬運動在本地更加普及。

自去年社會事件及今年新型冠狀病毒持續接近一年，經濟受到嚴重打擊，失業率上升，作為馬會員工，我們期望馬會可以開拓收入來源以保我們業界就業機會。馬會現時有超過二萬名兼職及全職員工，若馬會能夠轉播更多賽事，將為員工帶來更穩定的工作機會及收入。馬會不是商業機構，大部分的收益都用於支持慈善社會活動，賽事轉播的額外收入更可為庫房帶來更多的博彩稅收入。

本會認為增加同步聯播海外賽事日，能帶來上述之良好效益，故表示支持賽馬會是次提出的建議。



主席 羅德權

二零二零年十一月十七日



新界沙頭角區鄉事委員會

Sha Tau Kok District Rural Committee, N.T.

致：博彩及獎券事務委員會

秘書處

敬啟者：

香港馬會增加同步聯播日的建議對於馬會建議把每年同步聯播日的上限增加 14 日，並由 2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本會意見如下。

馬會多年來提供受規管的博彩渠道，以滿足市民對博彩活動的需求，同時亦致力打擊非法外圍賭博，及提供有節制博彩宣傳和教育。在本地馬迷對海外賽事的興趣日漸濃厚下，容許馬會增加同步聯播日，可讓馬迷選擇在合法途徑下，參與世界各地的國際賽事，把本來投入非法外圍平台的注額，轉移至合法渠道，不但可增加政府稅收，亦可增加馬會作慈善用途的捐獻，回饋社會，幫助弱勢社群。

在疫情影響下，本港經濟持續低迷，增加聯播日除增加政府的稅收外，亦可為社會創造額外就業機會，讓社會各方面均受得益，因此本會對上述建議表示支持。

新界沙頭角區事委員會



主席 李冠洪 議員 MH

日期:16-11-2020



新界青年聯會

Federation of New Territories Youth

www.fnty.org.hk

新界青年聯會支持香港賽馬會 增加同步聯播日的建議

香港賽馬會（下稱「馬會」）建議政府將每年同步聯播日的上限增加 14 日，並由 2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行。新界青年聯會（下稱「本會」）支持馬會的建議。

1 有效打擊「外圍波」

特區政府的一貫博彩政策，是承認賭博活動的合法性，但將其限制於少數規範及受監管的途徑，同時嚴厲打擊非法賭博活動，以及其衍生出的社會問題。本會雖不讚成、不鼓勵賭博，但理解特區政府的博彩政策。

非法「外圍波」的存在嚴重影響政府博彩及支持政策的落實。一直以來，「外圍波」莊家都大力設法吸引及鼓勵香港的投注者投注，而在本港馬季歇暑期間，「外圍波」成為馬迷投注的唯一途徑。如果馬會可在歇暑期間接受更多同步聯播非本地賽事的投注，可為馬迷提供合法投注渠道，降低「外圍波」的吸引力。

本會的一位前義工領袖，積極上進，熱愛公益，深受其他義工的歡迎。在學期間極其熱愛足球，後因誤墜「外圍波」，經濟損失慘重，在巨大的壓力下跳樓輕生，年僅 27 歲，令其家人及與他熟識的朋友和義工們深感痛心。本會重申不讚成及不鼓勵賭博行為的立場，但理解部分市民有博彩需求。馬會獲政府授權，是本港唯一合法的賽馬及足球博彩的機構，其營運須遵循《賭博條例》和牌照規定，且有相對完善的「有節制博彩政策」，如不接納信貸投注、提供治療和輔導服務等，將賭博對個人、家庭和社會的負面影響盡可能地降低。馬會的建議可將市民的博彩需求納入政府有效監管，打擊非法「外圍波」，避免類似憾事發生。

2 對就業和政府財政影響正面

受新冠肺炎疫情影響，本港失業率高達 6.4%，居高不下。而於馬季歇暑期間進行同步聯播還可創造新的就業崗位，對於緩解就業壓力效果正面。

此外，在新冠肺炎疫情下，政府財政收入減少，開支大增。而根據估算，若馬會的建議得以落實，每個賽季的博彩稅將增加約 3.5 億元。這對於減輕政府財政壓力有一定幫助。

總體而言，本會認為馬會的有關建議效果正面，希望特區政府予以接納。本會亦促請特區政府進行更多有效打擊非法賭博的行動，減少非法賭博對社會，特別是青年群體的危害。



新界青年聯會

主席：葉錦洪先生

2020 年 11 月 16 日



離島婦聯
www.oiwa.org.hk

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

香港賽馬會增加同步聯播日建議之意見

敬啟者：

離島婦聯紮根離島超過四十年，致力維護婦女權益，推動兩性平等。舉辦健康醫療、文化等教育活動。並推動婦女積極參加社會事務，將團結互助的精神推廣至社區及家庭各成員中，鼓勵助人自助再助他的睦鄰精神，共建和諧共融社區為目標。

香港賽馬會慈善信託基金是本會多年的地區合作夥伴，攜手促進社區發展。歷年來，香港賽馬會慈善信託基金，是香港慈善事業的重要推動者，馬會慈善信託基金得以大額捐款資助社區項目，頗依賴馬會獨特的綜合營運模式。而馬會每年將超過九成的稅後經營盈餘撥捐慈善信託基金，多年來於社區發展擔當重要角色。

疫情期間，馬會透過慈善信託基金先後撥捐1.96億港元支援超過100萬名社會上最有需要幫助的弱勢社群，並已直接向社區捐出168萬個口罩，累計已採購或資助慈善機構購買了超過1400萬個口罩，紓緩不少基層家庭的需要。同時增設「新冠肺炎緊急援助基金」，撥款共一億元，為本地慈善機構及社區提供應急支援。本會得悉，馬會擬申請增加同步聯播日的建議，是拓展收入的有效途徑，若獲當局批准，亦可為庫房帶來額外收入，有助馬會慈善信託基金持續資助慈善服務的貢獻。

作為一個以婦女及家庭為服務對象的慈善機構，本會十分關注非法外圍賭博及其對基層家庭的影響，尤其在夏天馬季歇暑的真空期，容易被非法外圍賭博莊家利用。本會注意到有報導指香港非法外圍賭博的投注額，已達到數千億港元，比合法博彩的投注額1500億港元高出一倍。

是次馬會建議由明年七至八月份開始，落實同步聯播境外賽事，為馬迷提供一個合法途徑投注境外賽事，以堵塞本地賽馬歇暑真空期，把非法外圍的投注額重新納入合法管道，亦能轉化為推動社會發展的新資源。



離島婦聯
www.oiwa.org.hk

本會認為受規管的博彩活動有助滿足市民對博彩的需求，亦發揮打擊非法外圍賭博的作用。但本會同時希望馬會能關注問題賭博對社會帶來的負面影響，投入更多的資源推動全港性的教育活動，預防病態賭徒的問題。



離島婦聯 主席

2020 年 11 月 18 日



灣仔區街坊福利會
Wan Chai Kai-Fong Welfare Association (H.K.) Ltd.

博彩及獎券事務委員會主席
方文雄先生 BBS, JP

方主席台鑒:

「香港賽馬會增加同步聯播日的建議」

灣仔區街坊福利會得悉 貴委員會正就上述議題展開諮詢，現附上我們的意見，以供有關當局參考。

灣仔區街坊福利會始創於一九四九年，是香港最早成立的幾個街坊會之一，當時適逢抗戰過後，百廢待興，本會肩負起協助政府處理區內緊急救災的善後工作以及相關的福利事宜。秉承着「守望相助，休戚相關；患難相扶，移風易俗」的宗旨，本會竭誠服務灣仔區街坊，透過舉辦定期的活動及興趣班，凝聚民心，推動社區發展。

社會當下正面對新型冠狀病毒的肆虐，公共衛生安全備受威脅，經濟發展亦受到嚴重打擊。統計處最新數據顯示，失業率及就業不足率創近 16 年新高，各個行業的職位空缺亦顯著減少。在此艱難時刻，如果馬會獲准增加同步聯播日，對社區帶來的就業機會及貢獻不容忽視。根據馬會的建議，由明年開始，同步聯播日的日數將由 23 日增至 37 日，並容許在歇暑期間進行，預計每個同步聯播日將創造大約 1100 個就業機會。我們相信，一旦建議獲批，除了增加庫房收入，所創造的 1100 個就業機會即使只是短期工作崗位，亦有助市民暫渡難關。

作為灣仔區的一個地區團體，有賴馬會支持，讓本會得以舉辦更多元化的地區活動，令更多街坊受惠。因此，如馬會獲准增加同步聯播日，帶來額外收入，相信對扎根地區的團體都有所裨益。本會亦期望馬會繼續關懷社區，投放更多資源予社區，與地區團體攜手共創更美好的社會。

順祝
身體健康！

2020 年 11 月 16 日



灣仔區街坊福利會

監察賭風聯盟

博彩及獎券事務委員會秘書處:

強烈反對馬會在歇暑期間增加同步聯播日

對於馬會建議把每年同步聯播日的上限增加 14 日，並由 2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本聯盟的意見如下:

監察賭風聯盟強烈反對馬會增加 14 日同步聯播外國賽馬賽事至 37 日，並反對有關同步聯播日的賭馬活動在歇暑期間進行。原因如下:

1. 增加賽事只會助長而無法打擊外圍

由零六年至今，馬會都以打擊非法賭博為由向政府申請包括改變博彩稅制，增加賽馬日，設立匯合彩池和增加轉播海外賽事。每次的申請，都能順利過關，主要是以增加博彩稅，創造就業職位和增加慈善捐款作為利誘，對於求財若渴的特區政府而言，在每年二百多億元的博彩稅再額外加多幾億元，是難以抗拒的誘惑。雖然如此，本聯盟重申，**打擊非法賭博並不是馬會的職責，反而是特區政府有關官員和警方的職責。**因此，馬會是次申請的理由不能成立。

須知打擊非法賭博，世界各地包括香港是不能徹底成功的，因為外圍莊家開盤是按着合法賭博的盤口而定。若要完全消滅非法賭馬，馬會必須停止所有的賽馬活動，這樣，外圍莊家就不能按馬會的場數招攬賭徒下注。

馬會越是增加賽馬日或轉播外國的賽事，就越能協助外圍莊家開更多的盤。馬會以增加轉播外國賽事與外圍莊家競賽，最終只會令賭風更為熾熱，受害者當然是沉迷賭博的香港人和他們的家庭。

2. 政府不應過度依賴博彩稅及馬會捐獻

事實上，馬會作為一個非牟利機構，他所有的收益都是按比例回饋社會。因此，它不需要竭力每年提升投注額和收益。況且，他每年從香港人吸納的賭注收益，都處於一個很高的水平。

馬會越是努力賺錢，特區政府就越是放任不管，令馬會代替了特區政府部份的社會職能和責任，例如在科研、環保、醫療、教育、社會福利、體育、文化藝術的資助等，其實這些本來都是特區政府應該做的事，亦間接令馬會成為一個政府愈來愈依賴，不敢開罪的機構。

3. 年青賭徒更易變為病態賭徒

是次申請，馬會認為對年青人的影響十分輕微。根據馬會資料顯示，14/15年登記的活躍投注客戶年齡由18至20歲有11,900個，佔了整個投注客戶的1.32%。在新冠狀肺炎疫情期間，馬會透過不同途徑積極鼓勵和吸引香港市民設立投注戶口，並連結他們的銀行帳戶，使賭徒能隨時可以由他們的銀行帳戶轉數入馬會的帳戶。本聯盟相信現時馬會的投注帳戶已經激增，當中年青人特別是18至20歲的帳戶也是倍增（請博獎會向馬會索取有關的資料，就知道賭馬影響着多少的年青人）。**年青人很容易掌握網上投注，試問數以萬計的年青人活躍投注戶口，加上仍未開設投注戶口但經常賭博的年青賭徒，真是影響十分輕微嗎？**（也請博獎會向戒賭中心了解年青人是如何受賭馬的影響）。

根據各戒賭中心的經驗，賭馬的確吸引很多中年人參與和沉迷其中。他們沉迷的過程幾乎全部都是從年輕時參與賭博開始。他們很多是來自基層或低收入的家庭。當中也有領取綜合社會保障援助和低收入家庭津貼的家庭。綜合明愛展晴中心和東華三院平和坊兩間戒賭中心賭徒求助者的統計，失業和領取綜援的求助者有1,877人，佔了總求助個案的13.1%。馬會認為是次申請對年青人影響十分輕微，因為多數參與者都是年齡40歲或以上。相信，這些失業和領取綜援的人士也包括在內。

4. 嚴重影響歇暑期間的親子關係

是次申請，馬會期望打破百多年的慣例，**讓馬迷在歇暑期間也可繼續賭馬，這不單助長賭風，更影響馬迷在年幼子女放暑假期間僅餘的親子時間，家庭活動**，甚至鼓勵外圍莊家照着馬會的盤口而開賭。馬會聲稱在暑假期間外圍的莊家不斷吸引賭客參賭，因此它要抗衡和打擊莊家所開設的非法賭博。但是，根據各戒賭三的經驗，賭場的賭客，麻雀館的賭客和賭馬、賭波的賭客是幾種不同的群體。在暑假期間，參與各類非法賭博活動的賭徒多以網上賭博和非法賭場為主。打擊這些非法賭博活動仍然是警方的責任，並不是馬會。若然馬會在暑假期間轉播外國賽事並接受下注，必然吸引有賭馬習慣的賭徒繼續參賭。須知持續不斷的賭博是引致賭博失調（Gambling Disorder）的一個原因。馬會向着年終無休的目標奔馳，又完成一里路了！熾熱的賭風又再吹拂了！

基於上述的原因，請各位博獎會委員就馬會是次申請**投下反對的一票**。

監察賭風聯盟

2020年11月17日

召集人：鄧耀祖先生

副本抄送：民政事務局



反對馬會增播越洋賽事
26/11/2020 13:58

To: "hab3@hab.gov.hk" <hab3@hab.gov.hk>,

明愛展晴中心展鵬組成員
強烈反對香港賽馬會在暑假期間增加同步聯播日

就香港賽馬會向特區政府建議由2021年開始，把每年同步聯播日的上限增加14日(即由23日增加至37日)。理據是

- 1.有關建議對青少年的影響十分輕微
- 2.創造約 1100個就業機會
- 3.帶來額外收入以作慈善捐款用途

為此，明愛展晴中心展鵬組成員對馬會的理據有以下意見。

1. 根據香港賽馬會的資料，現時透過香港賽馬會投注同步聯播非本地賽事的人士當中，約 80%人士年齡為四十歲或以上，只有不足 1%的投注人士年齡介乎十八至二十一歲。乍看之下，青少年人參賭的人好似好少，但是，展鵬組組員認為青少年參賭，實在是一個都嫌多。根據過去的調查發現，香港的年青人小至9-10歲已經有參與社交賭博的習慣，而由於青少年的心智未成熟、判斷力弱，容易受朋輩影響，因此，他們覺得賭博只是小事一椿。然而，轉播日正值暑假期間，青少年可有更多時間、機會接觸賭博，一旦染上賭癮，便很容易成為一個賭博失調者，更衍生借貸行為。眾所周知，賭博禍害並不是「一人做事一人當」這麼簡單的，而是涉及全家，甚至整個家族都會受到牽連，或被迫一齊「找數」的。所以，賭博對青少年的禍害絕不輕微。
2. 轉播賽馬日正值暑假，香港賽馬會現時在全港設有百多間場外投注處，縱使有額外的賽事，只需要延長現行兼職工作人員的工時，便可應付有關的投注工作，再加上時下投注人士已經很大程度上改為網上投注。故此，展鵬組成員相信香港賽馬會在毋需增聘人手的情況下，便可以應付賽事的相關工作。因此，香港賽馬會聲稱可以增加1100個就業職位，根本就是子虛烏有。相反，增加轉播賽事未見其利，先見其害；因為賽事增加首先直接影響戒賭人士的決心，現在戒賭的人面對著香港賽馬會每個馬季逾千場賽事(800多場的本地及164場越洋轉播)所造成的誘惑已不容易，根據調查資料所得，很多正在戒賭的人在面對一場又一場的衝擊之下，決心稍為軟弱便會墮入翻賭的陷阱之中，期間所引起的社會問題，例如：家庭關係破裂、子女情緒問題及債務問題等都必須要由全港社會「找數」。
3. 展鵬組成員認為，香港賽馬會無必要增加轉播越洋賽事來增加收入慈善用途。我們建議香港賽馬會可以跟政府商量減收博彩稅，藉此增加支持更多慈善團體。另外，與香港警方加強合作打擊網上非法賭博、聚賭及營賭行為，並加重相關罰則，才能達致香港賽馬會所期盼的---「杜絕一切非法賭博行為」。

馬會的核心宗旨：致力建設更美好的社會。展鵬組成員認為若堅持要增播越洋賽事，就是違背宗旨的自欺欺人行為。我們明白賭業經營者要取得盈利是無可厚非，但若果為了盈利而忘記自己經營的宗旨，為社會增添更多問題的話就太自私了。所以，我們祈望香港賽馬會能夠貫徹宗旨，為建設更美好、更健康的香港，放棄增加轉播越洋賽事，叫香港人不再為賭死為賭亡，為賭弄得家破人亡！



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19 November 2020

Mr. FONG Man-hung, David, BBS, JP
Chairman
Betting and Lotteries Commission
13/F, West Wing
Central Government Offices
2 Tim Mei Avenue, Tamar
Hong Kong

Dear Mr. Fong,

**Hong Kong Jockey Club's Proposal of
Increasing the Number of Simulcast Days
Public Consultation**

Hong Kong Academy of Medicine (HKAM), established by the HKAM Ordinance (Cap 419) in 1993, is an independent institution with statutory power to organise, monitor, assess and accredit all medical and dental specialist training in Hong Kong. It also provides and accredits continuing medical education and continuous professional development for the purpose of specialist registration.

The Hong Kong Jockey Club has been a staunch supporter of HKAM since its inception. The Hong Kong Jockey Club Charities Trust (Charities Trust) has generously donated \$165M towards the construction cost of the 10-storey Academy Building, which houses a range of facilities mainly for conducting medical and dental specialist education, professional training, scientific conferences and meetings, etc. Over the past years, many educational activities, conferences and training for medical/dental specialists have been conducted at the Academy Building for over 8,200 Academy Fellows and many other allied health professionals.


In 2013, the Academy received a donation of \$53.53M from the Charities Trust for the establishment of the Hong Kong Jockey Club Innovative Learning Centre for Medicine (HKJC ILCM) within the Academy Building. The mission of HKJC ILCM is to promote innovative simulation-based learning and research among healthcare professionals to deliver safe and quality patient care. Over 20,000 healthcare professionals have been trained in HKJC ILCM since 2013.

In 2014, the Charities Trust donated another \$271.12M to the Academy for the establishment of the Hong Kong Jockey Club Disaster Preparedness and Response Institute (HKJCDPRI). Its mission is to establish Hong Kong as a regional and an international leader in disaster preparedness and response training, raise public awareness and promote community resilience. Over a 5-year project period between 2014 and 2019, its notable achievements have been well-recognised by different stakeholders. The Charities Trust has agreed to continue to provide funding support to HKJCDPRI for a further 3 years until 2022. The Institute has been working closely with medical and academic institutions, government departments, non-governmental organisations and communities in Hong Kong. In August 2020, as commissioned by the Government, HKJCDPRI has helped the Academy to coordinate swabbing and infection control training sessions for around 2,000 healthcare professionals who participated in the COVID-19 Universal Community Testing Programme.

The Academy Building, HKJC ILCM and HKJCDPRI would not have been in existence without the continued support of The Hong Kong Jockey Club.

The Hong Kong Jockey Club, being Hong Kong's largest community benefactor, grants its surpluses for charitable and community projects to improve the quality of life of the people of Hong Kong, providing immediate relief to those most in need. The Charities Trust has also made good use of its resources to proactively identify and initiate projects that anticipate future community and social needs. It is important for the sustainable development and future success of the Academy and other beneficiaries if the Charities Trust can continue their contribution and support for our projects so as to benefit more people in Hong Kong.

Yours sincerely,



Professor LAU Chak-sing, JP
President
Hong Kong Academy of Medicine

Annex II Hong Kong Jockey Club's Proposal of Increasing the Number of Simulcast Days

On HKJC's proposal of increasing the maximum number of simulcast days per year by 14 and allow such additional simulcast days to take place during the summer break starting from 2021, my / the Organisation's comments are as follows:

It has been a common and conventional practice for many charity organisations to focus on maximising the potential financial return of their investments rather than considering the positive social impact of the investments. With the emergence of the concepts of good society and responsible citizenship, the notion of giving and making difference has begun to reshape the culture and practice of investing to produce a social impact. This has been superbly exemplified by the extensiveness, diversity and scope of charitable projects that the Hong Kong Jockey Club (HKJC) has been championing and supporting for the betterment of Hong Kong throughout these years.

The Hong Jockey Club (HKJC) has been a staunch supporter to The Chinese University of Hong Kong since 1960s.

Through its Charities Trust, Hong Kong Jockey Club has supported more than 80 meaningful projects at CUHK, ranging from education, campus development, medical and public health areas. Some of the key establishments include the establishment of Jockey Club School of Public Health and Primary Care, Jockey Club Institute of Ageing as well as Jockey Club Clinical Tower at the CU Medical Center which is expected to operate next year.

The support from HKJC also provided a platform and resources engaging CUHK academia and professionals with NGOs to leverage capabilities and make the best use of combined resources to enhance community and health care coordination and provision of care for vulnerable individuals.

HKJC generous donation also helps us to build state-of-art campus update facilities and provide an environment that facilitates study and enrichment of campus life. Hong Kong Jockey Club Postgraduate Halls 1 to 3 enabled the University to attract the talented graduate students from Hong Kong, the Mainland China and overseas to bring together diverse cultures, and promote academic exchanges.

Also, The Jockey Club Museum of Climate Change was established in 2013 as the first museum of its kind in the world, offering an interactive, multimedia exhibition that showcases valuable collections and information about climate change. It is the ideal venue for the public, especially students and teachers, to champion the cause of environmental stewardship and keep themselves abreast of the latest developments on environmental conservation and sustainability. Extended activities of the museum exhibition include an eco-tour of the prime ecological sites and green facilities on CUHK campus, and a variety of workshops and activities that promote green living.

Youth development has always been one of the strategic areas supported by Hong Kong Jockey Club, especially promoting innovation education. Signature projects include CUHK Jockey Club AI for the Future Project and Jockey Club VR Project for Enhancing Chinese Language Literacy.

CUHK and HKJC also joined hand to build the first cross-sectoral support platform in Hong Kong that helps students and non-engaged youth plan their futures through CLAP for Youth @ JC s. This programme fosters an enabling environment and provide multiple pathways for young people to identify their career interests and develop their career roadmaps.

CUHK is proud to be a partner of HKJC in carry out projects that anticipate future community and social needs, and facilitate positive change for a better society.

Name: Professor Suk-Ying Wong, Associate Vice-President

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



香港教育大學

The Education University
of Hong Kong

20 November 2020

Mr David Fong Man-hung, BBS, JP
Chairman, Betting and Lotteries Commission
13/F, Central Government Offices, West Wing
2 Tim Mei Avenue, Tamar, Hong Kong

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

Dear Mr Fong,

Proposal of Increasing the Number of Simulcast Days
Submitted by the Hong Kong Jockey Club

Reference is made to the proposal of the Hong Kong Jockey Club (HKJC) on the maximum number of simulcast days per year.

As the largest charitable organisation in Hong Kong, HKJC has been contributing to the betterment of society through its philanthropic initiatives covering community services, education, health, sport, recreation and culture. Over the decades, HKJC has been playing a significant role in the community's development and its generosity has benefitted all walks of life.

With HKJC's staunch support, the University has been able to undertake various impactful projects for the benefit of the local school sector and the community, such as the 'CoolThink@JC' Project in the areas of education technology and innovation, the 'From Words to Culture Programme: An Animated Way to Learn Chinese' Project in the areas of language learning and cultural education, the 'Jockey Club Youth Academy for Special Educational Needs' Project for a wide range of stakeholders, 'CLAP for Youth@JC' Project to enhance youth development, as well as the 'C-for Chinese' Project to support ethnic minorities in Chinese learning.

HKJC's charitable endeavours are worthy of public support. While the views put forth by different stakeholders will be duly considered in the consultation, the proposal could help sustain and improve HKJC's charitable contributions to the community to better fulfil its unswerving commitment to serving Hong Kong.

Yours sincerely,

Professor Stephen Y. L. Cheung
President

香港賽馬會增加同步聯播日的建議

對於馬會建議把每年同步聯播日的上限增加14日，並由2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本人/機構意見如下：

就有關香港賽馬會於歇暑期間增加同步聯播日之建議，香港足球總會
不持反對意見，亦期待香港賽馬會能夠如建議文件中所陳述，透過當
中所得收益，用作支持社群及慈善用途。

姓名： 貝鈞奇

所屬機構（如適用）： 香港足球總會



本函檔號：CSW/F/1653/2020

博彩及獎券事務委員會
方文雄主席

方主席

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，明愛亦成功向基金申請贊助，開展不受政府資助的服務，支援社會上有急切需要的社群。

近年，基金從被動地回應社會需要，轉而主動積極地發掘隱藏於社會的問題和被受忽略的社群，更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讓被受忽略的人士和家庭長期陷於困境之中，明愛社會工作服務亦獲邀參與這些計劃。

除上述計劃外，基金支持香港明愛重建荃灣服務中心和設立「照顧者」資源和支援中心。兩個中心投入服務至今，深受業界及市民大眾的歡迎，每年受惠人次達二十多萬。若沒有基金的慷慨贊助，明愛便可能在缺乏政府資助的情況下未能提供與時並進，切合需求的服務。

此外，今年初在新冠肺炎肆虐期間，馬會簡化流程，提供及時資助，讓數以百萬計的弱勢社群得獲防疫物資，這也實在值得讚許。

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，並透過資助更多項目，減低賭博可能形成的危害。

最後，期望基金能夠繼續對香港社會的長足發展作出承擔，發揮正能量和關愛精神，支持更多社區田計劃，讓貧困無助的弱勢社群得到適切的服務，舒解生活的困境，開展豐盛的人生。

社會工作服務部長

黎永開太平紳士 謹啟

二零二零年十一月廿七日

天主教香港教區社會服務機構
The Official Social Service Agency of the Catholic Church in Hong Kong



附件二

香港賽馬會增加同步聯播日的建議

對於馬會建議把每年同步聯播日的上限增加 14 日，並由 2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本人/機構意見如下：

得知馬會以上建議，目的為打擊日益嚴重的非法賭博，如馬會之建議獲接納，期望馬會履行以下方面的社會責任：

1. 已增加的博彩稅收，必須用於慈善用途，以惠及社群；
2. 必須加強年青人避免沉溺賭博的教育及預防工作等；
3. 預計創造的 1100 個就業機會應設有一定比例，如四成應優先聘請十八至二十四歲年青人，及優先聘用弱勢社群（如失業/就業不足人士/殘疾人士等）。

（要求不公開機構名稱）

香港賽馬會增加同步聯播日的建議

對於馬會建議把每年同步聯播日的上限增加14日，並由2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本人/機構意見如下：

見附頁

姓名：呂慧蓮

所屬機構（如適用）：香港青年協會

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，自 1960 年代開始，已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，肩負慈善功能與社會角色，體會甚深。本會謹以過去工作經驗為基礎，陳述有關意見。

（一）長久而明確的慈善功能

香港賽馬會一直是推動本地慈善事務發展的標誌性機構。過去 10 年，該會的慈善信託基金平均每年捐款超過 37 億港元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 2019／20 年度為例，該會所作之慈善捐款高達 45 億港元，惠及 210 個慈善及社區項目²。同一年度，社會福利署為本地非政府機構提供的經常性資助約為 194 億港元³；香港公益金則撥款逾 2 億 9 千萬港元，予 163 個會員機構⁴。香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舉足輕重。

¹ 參考香港賽馬會網站資料 <https://charities.hkjc.com/charities/chinese/charities-trust/index.aspx>

² 同上

³ 參考社會福利署網站資料

https://www.swd.gov.hk/storage/asset/section/2881/tc/201904_Hong_Kong_Fact_Sheet_chi.pdf

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

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，將逾 70% 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，主動回應社會需要

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。該會積極行善，主動研究並深入了解社會問題，致力連繫政府、非政府組織、教育界和商業機構，合力推動創新的社區服務、教育和有益身心的計劃，回應社會不斷轉變的需求。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。其中如提升教育界及社福界能力的「教師社工創新力量」、協助青年就業與生涯規劃的「鼓掌·創你程計劃」、支援主流學校中自閉症學童之「喜伴同行計劃」，以至捐助各類長者、復康、體育和環保相關的慈善項目，均是顯著例證。而在今年新冠病毒疫情期間，該會更迅速推出抗疫紓困措施，包括支持如本會等受助機構推行抗疫項目，為弱勢社群提供支援，至今已惠及過百萬人⁶。

⁵ 參考香港賽馬會《2019/20 年報》

https://corporate.hkjc.com/corporate/common/chinese/pdf/report-2019-20/HKJC_AR20_Full.pdf

⁶ 參考香港賽馬會《2019/20 年報》

https://corporate.hkjc.com/corporate/common/chinese/pdf/report-2019-20/HKJC_AR20_Full.pdf

(三) 為本港非政府服務機構提供穩定財政資助

香港賽馬會一直積極繼續投放資源，為本地非政府機構、社會組織及學術團體提供財政資助，從而讓社會有需要的群體受益。

以本會服務為例，於 2019/20 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，包括赤柱戶外活動中心的重建工程（共約 青協領袖學院開辦的（逾 3,600 萬港元），防止自殺的「網上危機支援服務」（逾 2,400 ），推動（逾 2 750 萬港元）Celebrate the Future”青年藝術教育計劃(逾 500 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，該會不僅照顧社會各方面的需要，亦為香港未來作出長遠投資，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，為本地福利服務與慈善工作提供創新空間和發展機會。

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在暑假期間受到賭博誘惑，加強提供並支持有益身心的青少年暑期活動。此外，政府亦應持續進行和加強相關的教育活動，協助各階層加深認識賭博禍害，防止他們沉迷賭博、或進行任何非法博彩活動。同時，當局必須為有需要人士提供紓緩病態賭博的全面支援和適切治療，以免造成影響深遠的社會問題。

— 完 —

2020 年 11 月 27 日

香港賽馬會增加同步聯播日的建議

對於馬會建議把每年同步聯播日的上限增加14日，並由2021 年開始容許有關同步聯播日的博彩活動在歇暑期間進行，本人/機構意見如下：

香港賽馬會自2014年至今一直支持本機構的青年服務發展，透過資助多項活動

及設施為青年人彌補正規教育的不足，並協助他們達至全人發展。本機構相信

香港賽馬會如能增加額外收入，定會以慈善信託基金作出慈善捐款，為青年服

務作出更大的貢獻。

姓名：曾昭龍

所屬機構（如適用）：香港青年獎勵計劃