



## ***SUBMISSION***

### **WORLD TOTE ASSOCIATION SUBMISSION TO THE BETTING AND LOTTERIES COMMISSION CONSULTATION ON HONG KONG JOCKEY CLUB'S PROPOSALS ON INCREASING THE NUMBER OF SIMULCAST RACES AND SIMULCAST DAYS.**

**11<sup>th</sup> February 2025**

#### **INTRODUCTION**

The World Tote Association (WoTA) is pleased to be able to make a submission to the Betting and Lotteries Commission on Hong Kong Jockey Club's proposals of additional Horse Race Betting activities.

As a global network of operators, WoTA is a trusted voice in the debate on gambling regulation which is being undertaken by many governments and regulators around the world.

**WoTA fully supports the Hong Kong Jockey Club's proposal on increasing the number of simulcast races and simulcast days over two racing seasons, 2025/26 and 2026/27.** The proposal further promotes the internationalisation of Hong Kong's racing and ensures increased cooperation between tote operators around the world. This will help ensure the offer is competitive and compelling, available to customers in Hong Kong and around the world, within the legal market which will drive revenues and help reduce the activity in the illegal market.

By way of background, the Hong Kong Jockey Club is one of the founding organisations and a Permanent Member of the WoTA Board. The Hong Kong Jockey Club chaired WoTA between 2020 to 2023 and continues to play a leading role in the Association, especially on the fight against crime, illegal betting and money laundering.

The Hong Kong Jockey Club's proposal fully meets the mission of WoTA members:

- Creating stronger national and global betting pools, especially through commingling, to support the respective horseracing industries;
- Expanding pari-mutuel pool betting through additional markets and sporting events content for the additional collective benefit of WoTA operators;
- Addressing the challenges of illegal wagering;
- Working collectively on diversity and inclusion within the pool betting sector to have a positive impact on both people and products

## **ABOUT THE WORLD TOTE ASSOCIATION**

WoTA brings together Tote (often referred to as parimutuel or pool betting) betting operators from around the world to work together to promote and support the horseracing industry in a socially responsible and sustainable manner.

WoTA has 23 Tote operators as members representing a turnover of more than €40 billion and 10 Associate members (technology and services providers and racing organisers). Every member of WoTA is a successful organisation in its own right but, in coming together to collaborate, members are aiming to ensure we can play a greater role in a financially sustainable horseracing industry around the world. This is in the DNA of every WoTA member and underpins every activity of the organisation.

Fundi Sithebe, CEO of 4Racing, South Africa and Keith Johnson, President of 1/ST Technology in US, are co-chairs of the Association for 2024 - 2026. Riko Luiking, General Manager of German Tote, is the Treasurer.

Under a strategy set by the WoTA Board, the organisation has Working Groups undertaking activity on three important areas of work which lie at the heart of pool betting:

1. Greater commingling of pools between operators through identifying and removing barriers, data sharing where appropriate and furthering mutually beneficial technology and betting protocols to ensure more attractive betting opportunities can be created for customers.
2. Improving integrity and standards by implementing industry-leading responsible gambling and AML procedures, sharing best practice and working constructively with national governments and regulators ensuring a better understanding of pool betting.
3. Developing the betting experience for the next generation of bettors and racing fans.

WoTA members have responsibilities to customers, shareholders, regulators, national governments, and society as a whole. Beyond legal obligations, our members are committed to maintaining a balance between their commercial objectives and social responsibility, including the promotion of responsible gambling and funding for horseracing.

Through local and international operation, Tote betting creates large pools with no risk taken by the operator which gives rise to a wide range of differentiated opportunity for customers through bet types that cannot be matched by fixed odds operators, commonly resulting in bets offering big dividends from small amounts bet by customers.

WoTA looks forward to continuing to work with the Betting and Lotteries Commission.

WoTA is happy for this response to be published.

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