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April 10, 2013

His Worship Rob Ford
Mayor, City of Toronto
Chair, Executive Committee
100 Queen St. W.
City Hall, Second floor, West
Toronto, ON M5H 2N2

Dear Mayor Ford and Members of the Executive Committee:

Re: EX30.1 New Casino and Convention Development in Toronto report

This correspondence responds to recommendations related to the health impacts of gambling expansion in the City Manager's report of April 5, 2013 on a proposed new casino in Toronto.

The Health Impacts of Gambling Expansion

The City Manager's report accurately describes the health risks of gambling expansion. As outlined in my two reports to the Board of Health (November 7, 2012 and January 28, 2013) and in the 2012 Toronto Public Health (TPH) Position Statement endorsed by the Board, evidence indicates that gambling expansion is associated with an increase in problem gambling and its related health impacts.

The two options identified in the City Manager's report will both result in an expansion of gambling availability in Toronto. As I concluded in November 2012, this is anticipated to increase the frequency and severity of problem gambling in the city, and the associated negative health impacts on individuals, families and communities. Although it is difficult to predict the magnitude of the increase, the main determinants relate to the local population's prior exposure to casino gambling and the density and vulnerability of the population in the immediate vicinity of the casino. I would therefore anticipate a much greater impact in the case of a downtown casino because of a lack of existing casino-style gambling in the area and because of the density of vulnerable populations nearby. However, I wish to underscore that both the establishment of a downtown casino and the expansion of gambling at Woodbine, raise concerns of increased problem gambling and related adverse health impacts which are identified in the City Manager's report.

Mitigating Harm

The most effective way to mitigate harm raised by gambling is not to host a new casino in Toronto. If City Council consents to a casino going forward, it is appropriate to make the City's approval contingent on measures to mitigate harm. Harm mitigation measures outlined in the 2012 TPH Position Statement on Gambling and Health¹ are:

1. Limiting casino hours of operation (no 24-hour access to casinos)
2. Limiting electronic gaming machines (such as slot machines), slow down their speed of play and control their operation
3. Eliminating casino loyalty programs
4. Prohibiting ATMs on the casino floor
5. Prohibiting casino credit and holding accounts
6. Reducing maximum bet sizes
7. Requiring daily loss maximums
8. Implementing strong casino self-exclusion programs
9. Issuing monthly statements to gamblers
10. Restricting where alcohol can be purchased/served

The conditions related to health impacts and harm mitigation as proposed in the City Manager's report do not in their present form ensure that the risk of increased problem gambling will be effectively addressed, or addressed at all beyond what is currently in place. The Ontario Lottery and Gaming Corporation (OLG) has already reviewed the harm mitigation strategies endorsed by the Board of Health and indicated minimal commitment to implement the vast majority of these measures (see OLG analysis found here: <http://www.modernolg.ca/article/olg-and-responsible-gambling-in-toronto/>).ⁱⁱ In Appendix A, "Conditions that Apply to both C1 and C2 Gaming Zones", Item 7.d., the City Manager's report recommends that the City would only require OLG to "review and consider" measures related to harm mitigation. Unlike the wording for other required conditions in the social contract, this language is weak and the effect is that if the OLG were to do nothing more at all it would still satisfy the City's conditions. My recommendation to the Executive Committee therefore is that the wording of this condition 7.d. be changed to:

a requirement that the OLG and casino operator(s) work with the Toronto Medical Officer of Health to implement harm mitigation measures to address the negative impacts of problem gambling as outlined in the Medical Officer of Health's report.

Sincerely,

Dr. David McKeown
Medical Officer Of Health

copy: Councillor Joe Mihevc, Chair Board of Health

ⁱ http://www.toronto.ca/legdocs/mmis/2012/hl/bgrd/backgroundfile_51872.pdf

ⁱⁱ OLG update. January 7, 2013. OLG and Responsible Gambling in Toronto.