

**Written Submission on  
Betting Duty (Amendment) Bill 2013**

- (1) The Betting and Lotteries Commission (BLC) is of the view that taxation revision for facilitating two-way commingling is outside BLC's ambit, which was the conclusion reached by BLC in 2009.
- (2) BLC has noted the Government's plan to amend the Betting Duty Ordinance and the content of two-way commingling arrangement.
- (3) BLC has noted that under a commingling arrangement, the participating parties follow the same dividend distribution rates in respect of the same bet type on the same race, which in turn would reduce the possibility of illegal bookmakers taking advantage of arbitrage of odds differences and discourage illegal bookmaking activities.
- (4) BLC has noted that a commingled pool which is larger than a separate pool in terms of size of total bets involved does not necessarily result in a higher dividend distribution rate for individual bettors. However, the general public usually do not have good knowledge of dividend calculation. Thus BLC is worried that the commingling arrangement might incur heightened gambling atmosphere amongst local bettors.
- (5) BLC will therefore monitor the situation and would seek to review the arrangement in one year's time after its implementation.

**Secretariat, Betting and Lotteries Commission  
May 2013**