

21 May 2013

Clerk to Bills Committee on Betting Duty (Amendment) Bill 2013  
Legislative Council Secretariat  
Legislative Council Complex  
1 Legislative Council Road

**Re: Betting Duty (Amendment) Bill 2013**

As President of The Hong Kong Racehorse Owners Association (HKROA), I am writing in support of the two-way commingling proposal contained in the legislative amendments of the captioned Bill.

For background, HKROA was established in 1978 by a group of enthusiastic Hong Kong racehorse owners. One of our major objectives of the HKROA was to encourage and ensure co-operative efforts in all matters pertaining or relating to the interests of racehorse owners in Hong Kong or elsewhere under the Hong Kong Jockey Club, including the buying, selling, racing and breeding of horses or ponies of all types and descriptions and the provisions of all manner of facilities and advice to members relating to such purposes and objects. The proposed two-way commingling arrangement is very well received by our members and is considered to be an effective measure to keep up the high standards of Hong Kong's horseracing industry which will in turn protect our interests.

Members of the Bills Committee may well be aware that illegal bookmakers have been making use of odd differences between Hong Kong and other overseas countries to profiteer. If no action is taken, these illegal bookmakers will become increasingly stronger and would sooner rather than later threaten not only the interest of horse owners and the Hong Kong Jockey Club but also peace and order of the Hong Kong society. As horse owners, the last thing we want to see would be our horses being used inadvertently by illegal gambling syndicates for illicit gains. And as law abiding citizens, we do not want to see Hong Kong condoning illegal gambling by inaction on the part of the Government and legislators.

Commingling has become very much an international norm amongst racing jurisdictions and is a proven and effective means to eliminate odds differences and arbitrage by unauthorized and illegal bookmakers. The HKROA therefore welcomes the Government's proposed arrangement and support any further action to be taken against such illegal bookmakers.

HKROA also considers the introduction of two-way commingling could in a long run help improve the overall horseracing standards in Hong Kong. Although our races, our horses, our trainers and our jockeys are already amongst the cream of the industry, we cannot be complacent. We hope the legislative amendment to introduce two-way commingling is but one of the many steps that will be taken by the Hong Kong Government to support the growth and development of the local racing industry in the months and years ahead.

Paul Wrobel  
President  
The Hong Kong Racehorse Owners Association