

FEEDBACK REPORT

Regulations concerning Electronic Gaming Devices Regulation amendments proposed November 18, 2024

DATE RECEIVED		FEEDBACK	RESPONSE & DATE OF RESPONSE
12/16/2024	1.	Inquiry into who the new amendments applied to.	12/23/2024 The proposed changes will apply to all holders of an EGD Operator's License and potential applicants once the licensing application process for Operator's Licenses is initiated.
	2.	Clarification was sought on the rationale behind expanding the definition of "EGD Facility" and adding "Associated Establishment" and what the expansion entails in terms of regulatory oversight.	12/23/2024 The existing definition of "EGD Facility" includes all areas within the building where the facility is located, including, but not limited to, restaurants, bars, lounges, and staff areas. "Associated Establishment" was introduced to clarify further the KGC's regulatory scope for establishments connected to or included within an EGD Facility, such as bars, restaurants, and retail stores. This ensures consistent safety, security, and compliance standards across all related businesses. KGC is considering adding language to Subsection 21(d) to state that an EGD Operators will oversee compliance through contractual agreements with such establishments.

March 14, 2025

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	3.	Clarification was sought regarding the anticipated role of Authorized Agents, the types of functions to be delegated, and the composition of the Regulatory Security Group.	<p>12/23/2024</p> <p>Approved Agents are listed on the KGC website under “Approved Agents”. They handle specialized tasks beyond the KGC's internal expertise, such as due diligence reviews and audits. While previously utilized for land-based gaming, Approved Agents are now formally recognized within the EGD Regulations.</p> <p>The Regulatory Security Group is an advisory body composed of representatives from Public Security, the Peacekeepers, the Kahnawake Fire Brigade, Public Works, Environmental Health, Environmental Security, and GardaWorld. This group does not have delegated regulatory functions.</p> <p>Note: The RSG will no longer consist of GardaWorld.</p>
	4.	Inquiry on content of Operator’s Agreement.	<p>12/23/2024</p> <p>The KGC indicated it was still drafting it, but it would clarify and set out an EGD Operator’s obligations as outlined in the EGD Regulations. All EGD Operators will acknowledge that they have read and understood the agreement.</p>
	5.	Request for confirmation on whether section 34 applies only to new applicants and not to existing licensees.	<p>12/23/2024</p> <p>Section 34 applies to new applicants.</p>

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	6.	Inquiry on the application of section 21.	12/23/2024 Section 21 applies to applicants and all EGD Operators (existing and new).
	7.	Inquiry regarding the rationale for incorporating standards and protocols, which are not laws, into the regulatory framework as an additional layer of governance.	12/23/2024 The rationale for including additional requirements, such as standards and protocols, is to ensure the safety and security of the community, as well as staff and patrons at KGC-licensed facilities.
	8.	Inquiry regarding the rationale for expanding ownership disclosure requirements, specifically whether the intent remains limited to disclosing persons or entities holding a specified controlling or voting interest.	12/23/2024 The KGC has always required ownership disclosure; the recent amendments clarify existing requirements to ensure transparency and accountability.
	9.	Inquiry regarding why current amendments apply specifically to EGD Regulations rather than Poker Regulations.	12/23/2024 The KGC is presently focusing on amendments to the EGD Regulations. However, this does not preclude future reviews or amendments to the Poker Regulations.
	10.	Inquiry regarding the KGC's authority over associated non-gaming activities when a gaming license is revoked, suspended, or not renewed, and the procedure for those activities to continue operating.	12/23/2024 There are different considerations for non-gaming activities within an EGD Facility or an establishment connected to an EGD Facility. The KGC is considering future amendments to the EGD Regulations to address the situation of

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			license termination, revocation or suspension on Associated Establishments.
1/10/2025 (Second Round of Questions)	11.	Inquiry regarding whether the KGC anticipates initiating the licensing application process for Operator's Licenses in 2025.	1/17/2025 The KGC does not have an approximate date at this time.
	12.	Request for clarification on the scope of regulatory oversight, specifically whether it extends to internal business operations, food quality, cleanliness standards, and accounting practices of associated establishments.	1/17/2025 The KGC plans to introduce further amendments concerning "Associated Establishments" with a focus on protecting the safety, security, and integrity of gaming operations. However, oversight will not extend to all operational aspects, such as restaurant cleanliness or food quality.
	13.	Request for clarification on whether the references to "Environmental Health" and "Environmental Security" refer specifically to Environmental Health Services (KSCS) and the Environment Protection Office, respectively.	1/17/2025 Confirmed.
	14.	Inquiry received about whether considerations have been made regarding the sharing of private community and territorial information with outside parties.	1/17/2025 Third-party service providers engaged by the KGC are bound by strict confidentiality restrictions.
	15.	Recommendation that the effect of license termination, revocation or suspension on Associated Establishment be included in the EGD Regulations.	1/17/2025 Feedback was noted.
	16.	Inquiry received regarding the rationale for the timing of the current regulatory amendments, and whether broader consultation or additional assessments should precede amendments.	1/17/2025 The amendments to the EGD Regulations are being implemented now to ensure they are fully established before accepting new applications.

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			This timing ensures that new operators will clearly understand and operate under the updated regulations from the outset rather than having to adjust after applying.
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