

Public Consultations Summary

For a New Liquor and Gaming
Regulatory Framework in Manitoba

Liquor and Gaming Regulatory Consultation Committee
James Allum, Chair

Winter 2013

Hon. Minister Dave Chomiak

Minister charged with the administration of The Gaming Control Act

Hon. Minister Jim Rondeau

Minister charged with the administration of The Liquor Control Act

Hon. Minister Steve Ashton

Minister charged with the administration of The Manitoba Lotteries Corporation Act

Dear Ministers:

Please find attached a written summary of the consultations for a New Liquor and Gaming Regulatory Framework in Manitoba, held over the fall of 2012.

It was my pleasure to serve as Chairperson for this process. I wish to thank my fellow MLAs for their assistance in the process: Thomas Nevakshonoff (Interlake), Frank Whitehead (The Pas) and Melanie Wight (Burrows). I also wish to thank the talented and helpful staff from the Gaming Control Commission and the Liquor Control Commission, without whom this process would not have been possible.

Our mandate was to start a conversation with Manitobans about designing a new regulatory framework for liquor and gaming. To this end, we provided a public forum for comments about existing rules as well as ideas for improvement and for ideas that ran along the guidelines of: reducing red tape, enhancing consumer choice, and ensuring public safety and social responsibility, including opportunities for community input.

Manitobans responded. We heard 43 presentations at public meetings held across the province, received 45 written submissions, and held 11 private meetings with various stakeholders, as well as receiving responses to an online survey. At every opportunity, we advised the participants that our job was to listen carefully to their views and to pass on what we heard. We believe that, along with this written summary, the verbal briefings and ongoing discussions that we have had with you over the past months fulfils that commitment and we are pleased and confident that the views of Manitobans has shaped the design and the content of the new regulatory legislation.

Our view is that while Manitobans want the new legislative framework to be modernized and less prescriptive, they also want to be sure that public safety is a priority. While there were strong advocates for a more permissive, less bureaucratic regulatory framework for liquor and gaming, there were equally compelling voices requesting that the regulations be strengthened to encourage individual responsibility, enhance neighbourhood safety and promote healthy communities. In short, the Manitobans we heard from want the new legislative framework to be modern and progressive but they also want it to be measured and balanced, much like the approach taken by the provincial government in the 2011 Hospitality Strategy.

We want to thank all the Manitobans who participated in our phase of the consultations: they were articulate, thoughtful, and respectful. As MLAs, we were honoured to be involved in this phase of the consultation process and thank you for this extraordinary opportunity to listen to Manitobans on an issue of importance to the future of our province.

I know that the views and ideas that we have passed on have already shaped the new regulatory regime and ongoing discussions with stakeholders are planned and underway to help prepare the new legislation. I want to commend you on your commitment to continuing to consult with Manitobans on the regulation of gaming and liquor in our province and the creation of a modern regulatory authority. I wish you all the best in this worthwhile endeavour.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Allum', with a stylized flourish at the end.

James Allum
Member of the Legislative Assembly of Manitoba
Fort Garry – Riverview

MODERNIZING THE LIQUOR AND GAMING REGULATORY FRAMEWORK

The April 2012 decision to merge the Manitoba Gaming Control Commission (MGCC) and the Manitoba Liquor Control Commission's (MLCC) Regulatory Services Division created a unique opportunity to review and modernize Manitoba's liquor and gaming regulatory framework to better reflect Manitobans' diverse and evolving social norms, consumer expectations and business practices. As such, a review of the liquor and gaming regulatory framework was undertaken to inform deliberations to:

- Modernize the liquor licensing and permit structure originally established in 1956;
- Integrate the complementary regulatory regime for gaming that was established in 1997;
- Identify functional efficiencies to streamline liquor and gaming regulatory services; and
- Build on the social responsibility and public safety initiatives in the province.

The Manitoba Government held public consultation meetings in fall 2012 seeking Manitobans' input and opinions in preparation for new legislation to establish a new regulatory act for liquor and gaming in spring 2013. This report presents the views and perspectives of all participants who chose to participate in the process.

SEEKING A BALANCED PERSPECTIVE

Access to liquor and gaming has evolved from public prohibition to public acceptance, with strong links to hospitality, social and entertainment activities for many Manitobans. The Liquor Control Act was proclaimed in 1956, and despite several amendments over the years, the act remains largely structured within the historical context of earlier attempts at prohibition and the desire to regulate alcohol as a moral danger, rather than reflective of modern expectations for consumer choice and personal responsibility. The Gaming Control Act was proclaimed in 1997 and has since been amended to strengthen accountability, enshrine dispute resolution and responsible gaming, and expand oversight.

A significant number of modernizing reforms were made to liquor legislation and regulation by the Manitoba Government under the 2011 Hospitality Strategy¹. These included the launch of a pilot project of smaller Liquor Mart Express stores to enhance convenience shopping in Manitoba. The first express store opened at the James A. Richardson Airport in fall 2011 and a second opened at a Winnipeg Safeway store in early December 2012. Measures to enhance public safety were also taken, including large increases to fines for disorderly conduct, a series of steps to counter underage drinking and making training mandatory in law for all serving staff. These strategic initiatives balanced economic opportunities, consumer choice and convenience with Manitoba's commitment to public safety laws that are among the toughest in the country. However, it was recognized that further modernization can be achieved with the merger of liquor and gaming regulation and updated legislation that better reflects the balanced approach launched with the 2011 Hospitality Strategy.

¹ <http://www.mlcchospitality.com>

Prior public engagement has shown that while Manitobans are generally accepting of liquor and gaming as part of a social occasion, entertainment option or hospitality event, they are also sensitive to public health issues and intolerant of threats to public safety and social well-being that can arise due to over-consumption, access by minors, and drinking and driving. In developing a new modernized regulatory framework for liquor and gaming, there needs to be a balanced approach to reflect the diverse interests and perspectives of individuals, businesses and community groups in Manitoba. The initial step in this process sought the advice and input of Manitobans through public consultations on three key themes that reflect and seek to build on the balanced approach that structured the 2011 Hospitality Strategy.

- **Red tape reduction – How can we reduce red tape?** How can we streamline licensing, permitting, registration and inspections processes, and improve flexibility for businesses, charities and occasional permit holders?
- **Consumer choice – How can we better respond to consumer needs?** What should be done to improve consumer choice and responsibility, recognize the province’s increasingly diverse culture and build on the 2011 Hospitality Strategy?
- **Public safety and social responsibility – How can we improve public safety and social responsibility?** What are the next steps for public safety initiatives that include tough drinking and driving laws, discourage over-consumption, encourage informed decision-making and invite community input?

This report outlines participants’ perspectives and ideas within each of the above themes for modernization. Participants brought forward diverse, and at times conflicting, views and perspectives on how to best achieve modernizing reforms. The consultation process highlighted the complexities and challenges associated with the myriad of views, ranging from unrestricted business operations to stronger laws to enforce public safety and responsible service and consumption of liquor and gaming.

In some cases, issues raised during the consultations fell outside of the scope of regulatory reform and related to operational issues associated with the merger of the Manitoba Lotteries Corporation (MLC) and MLCC’s gaming and liquor sales operations. Overall, the range of opinions and perspectives presented demonstrates the challenge associated with achieving a modernized and balanced approach within the new liquor and gaming regulatory framework. While each participant’s unique view and perspective cannot be individually addressed, the themes highlighted below capture the range of views and highlight the need to create opportunities for community input in the new regulatory system as well as to establish mechanisms for ongoing dialogue with stakeholders.

PROCESS

During the consultation process: 122 individuals and organization representatives attended public meetings; 43 presentations were made at public meetings; 11 individual meetings were held with targeted groups; 44 written submissions were received; and 118 respondents participated via the online survey. Details of the process and a list of participants are provided in the sections below.

In early September 2012, a news release was issued and advertisements were placed in a number of newspapers (Winnipeg Free Press, Winnipeg Sun, La Liberté and other Manitoba community newspapers) inviting Manitobans to participate in the public consultations. In conjunction with the advertising campaign, a website (linked through the MGCC and MLCC sites) was launched to provide Manitobans with additional information including a discussion paper, gaming and liquor background information, links to related agencies and the opportunity to provide input through an online survey or written submission. The website also encouraged individuals and organizations wishing to make a formal presentation to register for public meetings in advance. Walk-ins at public meetings were also accommodated.

Targeted invitations were sent to approximately 100 organizations, including those in the hospitality and restaurant industry, community organizations and related agencies, charitable organizations and not-for-profit agencies impacted by gaming and liquor regulations. These groups and individuals were identified in consultation with the MGCC and MLCC Regulatory Services Division and built upon the merger review conducted in summer 2012 to ensure communication regarding the consultation process was as comprehensive as possible.

MEETINGS

Public consultation meetings were held in six communities across the province. Meetings were held in late afternoon and evening, and an additional daytime meeting was added in Winnipeg, to accommodate those interested in attending. The six communities included:

- Arborg (September 18)
- Thompson (September 19)
- The Pas (September 20)
- Brandon (September 24)
- Winkler (September 25)
- Winnipeg (September 27)

Public meetings were recorded by Hansard. Cree language translation services were available in Thompson and The Pas, and French language translation services were available in Winnipeg.

Eleven individual stakeholder meetings were held with targeted groups, including those in the hospitality and restaurant industry, community organizations and related agencies, charitable organizations, not-for-profit agencies and law enforcement. These meetings provided an opportunity to explore in greater depth their opinions and perspectives with respect to liquor and gaming legislation, and provided an opportunity to clarify and discuss information previously collected during the merger and integration process for regulatory services.

CONSULTATION PARTICIPANTS

As noted, participants from Manitoba communities, industries, and organizations participated in the consultation process. Following is a list of the organization and individual participants.

Consultation Participants ²	
<ul style="list-style-type: none"> • Addictions Foundation of Manitoba • Adrenaline Adventures • Aseneskak Casino • Association of Manitoba Municipalities • Billiard Establishment • Boreal Bounty Products • Bowls Manitoba • Bowsman Community Store • Cambridge Hotel • Canad Inns • Canadian Federation of Independent Business • Canadian Food & Restaurant Association • CentreVenture Development Corporation • Chelsea Place Autumn Leaves Seniors Club • City of Brandon • City of Thompson • City of Winkler • First Nations – Names Confidential (2) • Dauphin Recreation Services • Diageo Canada • Frantz Motor Inn • Gladstone Golf and Country Club • Greenroom • Head in the Sand Records • Independent Community Investment Corp • Keystone Motor Inn • Kikiwak Inn • Le Garage Café • MADD, Brandon Chapter • MADD, Winnipeg Chapter • Manitoba Government & General Employees' Union (MGEU) • Manitoba Hotel Association (MHA) • Manitoba Lodges and Outfitters Association • Manitoba Restaurant & Foodservices Association 	<ul style="list-style-type: none"> • Manitoba Safe Grad (Brandon) • Melita Legion • Mona Lisa Restaurant • North Point Douglas Seniors Association • Parlour Coffee • Paul and Susan Spiropoulos, Catering Business Owners • Private Citizen – Brandon (2) • Private Citizen - The Pas (2) • Private Citizen - Thompson (3 & Joint) • Private Citizen - Winnipeg (2) • Private Citizen - Written Submission (5) • Renaissance Brandon • Republic Nightclub, Fame Nightclub and Opera Ultralounge • Royal Canadian Legion No. 161 (Arborg) • Royal Canadian Legion No. 18 (Winkler) • Royal Canadian Legion No. 182 (Gimli) • Royal Canadian Legion No. 252 (Winnipeg South Osborne) • Royal Canadian Legion No. 90 (Fort Garry) • South Beach Casino & Resort • Spirits Canada • Stagger Inn Bar & Grill • Superb Entertainment • The Gameshow Guy • Town of The Pas • United Commercial Travelers • Urban Sparq Hospitality • West Alexander Residents Association • White Owl Melita • Wii Chiiwaakanak Learning Centre • Winnipeg Musicians' Association • Winnipeg Police Services

² Some participants presented multiple times using the variety of methods available (i.e., public meetings, individual meetings and written submissions).

WHAT WE HEARD – A SYNOPSIS OF PARTICIPANTS’ VIEWS

As has been noted, the views and interests of participating individuals, businesses and community groups are diverse and at times conflicting, making it difficult to summarize what was heard into a single perspective. The MLA Committee reviewed, reflected upon, and summarized the ideas and perceptions arising within each of the overarching themes for modernization: red tape reduction, consumer choice, and public safety and social responsibility. These key themes represent the full range of participants’ views to ensure a balanced understanding of both real and perceived impact associated with modernizing liquor and gaming legislation and regulations.

How can we reduce red tape? How can we streamline licensing, permitting, registration and inspections processes, and improve flexibility for businesses, charities and occasional permit holders?

Many aspects of the current liquor legislation and regulation are widely perceived as outdated and not reflective of today’s society and market realities. In addition, it is believed that liquor and gaming permitting/licensing could be simplified and further streamlined to improve application and reporting processes. A number of participants acknowledged the initiatives launched as part of the 2011 Hospitality Strategy, such as multi-year licences, pro-rated licensing fees, and standardized closing times as efforts to reduce red tape, and look forward to more positive changes along these lines. A summary of the key themes with respect to reducing red tape are provided below.

1. Liquor licence classes and permit requirements should be more flexible and responsive to modern service expectations, within a consistent regulatory framework.

In general, participants are supportive of recent modernizing reforms made as part of the 2011 Hospitality Strategy, such as multi-year licences and ending quarterly reporting requirements for food-liquor sales. It was noted that some larger, multi-venue and multi-location hotels tend to support the current framework for liquor licences and have made significant investments to meet longstanding licensing requirements and specifications. Conversely, a number of smaller and prospective business operations expressed their interest in having fewer licence classes, less rigid licensing requirements, more flexibility and opportunities for live music venues.

Participants representing restaurants, nightclubs, sports clubs and entertainment facilities expressed operational challenges due to restrictions within current liquor licence classes. These included:

- Flexibility for Hours of Operation: Greater flexibility is desired, including the ability to extend operating hours during special events and Sunday hours to meet customer demands. Others, such as legions, believe that standardizing closures beyond 1 a.m. are an added burden on their establishments and on the volunteers that support operations.
- Broaden the Definition of “Live Entertainment” for Cabarets: Current liquor regulations limit the definition of the types of “live entertainment” required to meet the requirement for two hours of live entertainment per day. It was suggested that the definition of live

entertainment be broadened to include entertainment such as DJs, live trivia and game shows. There was also support expressed for maintaining the requirement that cabaret licence holders provide two hours of live entertainment daily to support local musicians and the local music industry

- **Membership Requirements:** It is perceived that membership requirements stipulated as a condition of a liquor licence are too rigid and act as a business impediment for licensed sports facilities such as billiard establishments, golf clubs, and private clubs such as legions. Membership sign-in can be time consuming and onerous for the operators and their customers, particularly when larger events are being held.
- **Food-to-Liquor Ratios:** There is a perception among business owners that the regulations requiring minimum food-to-liquor sales ratios are outdated and limit business operations. Examples included: customers not wanting to order meals at cocktail lounges later in the evening; restaurants offering premium (i.e., expensive) wine products; and cabarets that must offer and promote an extensive hot food menu.

A number of participants representing large, multi-venue facilities proposed removing or loosening other specific liquor licence restrictions. Suggestions included the requirement to maintain a 1:1 seating ratio for indoor/outdoor (i.e., patio) capacity and square footage and limitations on the freedom of customers to carry alcoholic drinks from one area to another. However, it is noted that opinions on priorities and methods to achieve this varied among participants, particularly smaller operators and organizations.

Many participants would like to modernize certain liquor service restrictions to better reflect changing social norms and the diverse demographics of their customers/patrons. Suggestions included:

- Allowing extended operating hours for special events, occasional permits to be granted and licence holders to serve liquor on religious holidays that are not necessarily observed by all Manitobans, such as Good Friday, Easter and Christmas.
- Allowing liquor service on the casino gaming floor, which is a common gaming industry practice in the United States and in most Canadian provinces. It was noted that liquor service is permitted at Video Lottery Terminal (VLT) establishments in Manitoba.

A number of participants expressed a desire that occasional permits and requirements for liquor service be further streamlined. For example, permit requirements can be challenging and costly to obtain for those wishing to host family functions such as a bridal shower or birthday party. One idea proposed was for a single, blanket venue permit to enable facilities such as community centres to host regular events or allow for a fixed number of events to be held annually.

2. The application and reporting processes for gaming and liquor licences should be simplified.

Participants involved in the consultation process held a variety of gaming licences, liquor licences, occasional liquor permits and/or permits for charitable events. It was suggested that the current application and reporting processes for these licences and/or permits could be simplified.

Suggestions included reducing the number of forms and detailed reporting information required for charitable gaming events and eliminating requests for information in annual application processes. Smaller operators asked for a streamlining of the application requirements for small raffles, draws and bingos conducted by volunteers. Reduced gaming licensing fees for fundraising events was also proposed. The argument was made that the current licensing fee is inequitable since it is assumed that administrative regulatory activities are similar regardless of the amount of gaming revenue raised.

Participants with multi-owner establishments would like to see the liquor licence application processes further streamlined. For example, under the current legislation, all liquor licence applicants must undergo an owner suitability assessment on an annual basis. This requirement presents a major challenge for “non-traditional” multi-owner establishments, such as First Nations and cooperative ownership structures, whose owners/holders of the liquor licence may change regularly. This requirement can create the potential for delays or operational impact.

3. More collaboration and education to support liquor regulation with a greater focus on repeat offenders and high-risk situations.

Many participants commented on the good working relationships with the MGCC and MLCC’s Regulatory Services Division. However, some perceive a cultural difference in approaches to liquor and gaming inspections. The approach for gaming inspections is perceived as more collaborative and educational, whereas the approach for liquor inspections is perceived to be more policing- and enforcement-oriented. Some participants with liquor licences would like to see a more collaborative and educational approach that focuses on educating licence holders to improve responsible liquor consumption and use. They believe that policing and enforcement efforts should be used for high-risk and repeat offenders rather than those with minor infractions. It was also suggested that collaborative partnerships with industry associations and employers be established to increase training on liquor legislation and regulatory requirements to support enforcement and prevention efforts.

Participants would like to continue to be involved and consulted as the new legislation is being prepared. In particular, they would like to have representation and an opportunity to provide input into the legislative process.

How can we better respond to consumer needs? What should be done to improve consumer choice and responsibility, recognize the province’s increasingly diverse culture and build on the 2011 Hospitality Strategy?

Opinions and ideas on this topic were shared by a number of participants, such as hoteliers, restaurant operators, beer vendors, entertainment providers, private enterprises, spirits manufacturers, recreational facilities and private citizens. Participants continued to support the 2011 Hospitality Strategy that focused on increasing support for hospitality industry operators and better recognizing Manitoba’s increasingly diverse and vibrant culture. However, some want even greater flexibility to respond to consumers’ needs and demands, and to capitalize on new market or economic development opportunities.

Some participants believe that individual consumers should be able to make their own informed and responsible decisions regarding the purchase and consumption of liquor or gaming activities. This was counterbalanced by participants who believe that the benefits of consumer choice are outweighed by the negative consequences associated with alcohol and gambling addictions. While views on consumer choice are predominately operational, rather than regulatory, they are included to reflect the full scope of participant input and to represent the common themes brought forward about consumer choice and responsibility.

4. Flexibility to better meet customers' needs and demands for more choices in the service and sale of liquor.

Businesses in the hospitality industry want to meet their customers' unique needs and demands with respect to the service of liquor. Suggestions included:

- Allowing the sale/service of liquor in non-traditional venues, such as grocery stores, spas, salons and on casino floors.
- Allowing the purchase of liquor through the use of non-traditional methods, such as online/mobile ordering and food delivery services.

5. Flexibility to capitalize on new market and service opportunities in liquor service and sale.

A number of participants involved in the sale of liquor proposed more flexibility for current liquor legislation and regulations to allow entrepreneurs to capitalize on new market and service opportunities. Examples included:

- Allowing cocktail bars or wine bars without the requirement to install a full kitchen and meet stringent food service requirements.
- The purchase and preparation of wine and beer kits at private U-Brews or U-Vins.
- Purchasing hard liquor and spirits from off-sale beer vendors.
- Brew pubs and microbreweries to sell their product in refillable gallon jugs.

6. Capitalize on liquor and gaming ventures to enhance community economic development.

The ability to capitalize on liquor and gaming ventures is seen as a key opportunity to support economic development within smaller municipalities. Some communities expressed a desire to host local casinos and MLCC liquor stores, and that construction of new liquor stores be preceded by public consultations with respect to identifying suitable locations and features.

7. A level playing field and opportunity for fair competition.

Hoteliers, restaurant operators, entertainment establishments and non-profit organizations expressed a need for a level playing field and the opportunity for fair competition. Suggestions included:

- Increase VLT machine distribution to increase revenue within communities.
- Expand their ability to advertise, offer promotions and special pricing.
- Increase handling fees for beer empties to help offset costs associated with service.

- Add marketing support for charitable organizations to better promote their fundraising activities and facilitate their inclusion in mainstream marketing.
- Ability to purchase liquor from MLCC at wholesale prices and to do so with credit cards and participate in the AIRMILES program.

How can we improve public safety and social responsibility? What are the next steps for public safety initiatives that include tough drinking and driving laws, discourage over-consumption, encourage informed decision-making and invite community input?

In general, participants believe that social responsibility and public safety are important components in the overall scope of the liquor and gaming regulatory framework. Many believe that government, business owners, industry leaders, charitable organizations, law enforcement and individual citizens all have a role to play to support responsible service, sale and consumption of both liquor and gaming products. With respect to liquor, participants were generally supportive of the reforms advanced by the 2011 Hospitality Strategy, which included an expanded legislative mandate for social responsibility for MLCC and tougher drunk driving laws. However, some believe more can be done to improve responsible drinking and gambling practices and public safety. A summary of the ideas presented with respect to social responsibility and public safety are provided below.

8. Efforts to reduce red tape and improve consumer choice should be balanced with effective social responsibility and public safety initiatives in Manitoba communities.

Some participants expressed the need to balance industry benefits with those of the community. It was suggested that more support, resources and funding are needed in certain regions to provide additional social services and assistance to communities. These participants expressed strong concern that exposure and proximity to the retail sale of liquor has a social cost to inner city neighbourhoods and children. In those cases, it was proposed that greater support and funding would help communities work on real and sustainable social and behavioural changes for those with alcohol addiction. Specific concerns included:

- The impact of liquor consumption and public intoxication, the proximity between beer vendors and an MLCC store, as well as the number of bars and party houses in the neighbourhood.
- The standardization of extended late hours, which is seen as increasing access to liquor and links to crime and social issues associated with late-night drinking.
- The perception that the provision of a multi-year liquor licence will take away opportunities to participate and share information in liquor licensing hearings.
- Reports from the Addictions Foundation of Manitoba that alcohol-related issues within youth and adult populations are heightened when coupled with gambling addictions.

These participants expressed concern that the social and economic costs they associate with enhanced consumer choice will outweigh any benefits.

9. Ensure that social responsibility and public safety initiatives remain an integral component of the regulatory framework for liquor and gaming and its relationship to law enforcement .

Several participants believe that appropriate accountabilities and responsibilities should be given to law enforcement. In particular, concerns stemmed from the concentration and operating practices of some licensed establishments, including over-service and the sale of liquor to intoxicated persons.

It was recognized that law enforcement agencies at times rely on liquor legislation as an aspect of enforcement. Participants indicated that liquor legislation can be an effective way to support crime reduction strategies and view the new regulatory framework as an opportunity to explore innovative partnerships between the regulator and law enforcement.

It was expressed that clear and well-defined laws can make it easier for business owners and their employees to ensure their own safety when dealing with intoxicated patrons. Suggestions included review of an owner's authority and responsibility for the "in vicinity" area outside of their establishment, including a definition for "vicinity", and reviewing the role of hospitality industry employees with respect to when and how they should handle difficult situations.

In general, participants agreed that the educational component of social responsibility measures should be strengthened by ensuring appropriate compliance training, involving industries and sectors in training and education process, and emphasizing public education and awareness campaigns. Feedback included strong support for:

- Training that enhances understanding of legislative and regulatory requirements, such as responsible service, problem gambling and available resources.
- Providing information and training to all licence and permit holders.
- Continuing public education and awareness campaigns and supporting more collaboration between regulators, licence and permit holders, social services agencies and law enforcement.

FINAL OBSERVATIONS

The public consultations on liquor and gaming regulation gathered a range of opinions and perspectives and demonstrated the challenges associated with achieving a modern and balanced approach. While each participant's unique view and perspective cannot be individually addressed in the new regulatory framework, the themes highlighted in this report will provide valuable insight into the legislative review process.

The consultation process provided an open forum to all Manitobans interested in providing their views and opinions. This process was chosen to encourage and facilitate broad participation. It is noted that some participants made multiple submissions, demonstrating their interest, and at times passionate views, on how best to create a new liquor and gaming regulatory framework for Manitobans.