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Gaming Policy and Enforcement Branch (GPEB)

**TGSNE1**  
**Technical Gaming Standards for  
Non-Electronic Pull Tab (Break Open)  
Tickets.**

Technical Standards Document (TSD) Version 1.0

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BRITISH  
COLUMBIA

The Best Place on Earth

**Ministry of Public Safety and Solicitor General**  
**Gaming Policy and Enforcement Branch**

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# 1 Overview of TSD

## 1.1 Introduction

### 1.1.1 General Statement I

The General Statements are as follows:

- a) These standards were developed in consultation with the British Columbia Lottery Corporation (BCLC). These standards supersede all previous Pull Tab (Break Open) Ticket standards, and are to be used in conjunction with all other requirements as stipulated in BCLC's Request for Proposal (RFP) and/or Detailed Game Specifications document for Pull Tab (Break Open) Tickets. Pull Tab (Break Open) Tickets that do not meet these standards, must not be offered for play to the public and may be returned to the supplier.
- b) All suppliers/manufacturers providing product must be registered with GPEB, unless the product is being provided for evaluation and/or testing purposes only. Any product being supplied by an unregistered vendor for evaluation and/or testing purposes only, must not be offered for play to the public.
- c) Before being permitted to be introduced for play by the public, all Non-Electronic Pull Tab (Break Open) Tickets used in the Province of British Columbia must be tested to the applicable requirements set forth in this Technical Standards Document (TSD).
- d) The British Columbia Lottery Corporation (BCLC) may select an appropriate Accredited Testing Facility (ATF), or other equivalent body, to perform this testing; however, BCLC's selection requires approval from the Gaming Policy and Enforcement Branch (GPEB).
- e) The appointed testing body must provide their evaluation results to BCLC, who in turn must provide these evaluation results to GPEB for review, and where required, subsequent discussion.
- f) Although the appointed testing body may recommend the approval of any Non-Electronic Pull Tab (Break Open) Ticket(s) for use in the Province of British Columbia, the ultimate authority to approve these tickets rests solely with GPEB. Only GPEB can issue a Certificate of Technical Integrity pursuant to the **Gaming Control Act of British Columbia**.

### 1.1.2 General Statement II

It is the policy of GPEB, in consultation with BCLC, to update this TSD at minimum once annually, to reflect any changes in technology, production methods, testing methods, or known cheating methods.

Note: GPEB reserves the right to modify (or selectively apply) the requirements set forth in this TSD as deemed necessary to ensure the integrity of gaming in the Province of British Columbia.

## 1.2 Acknowledgment of Other TSDs Reviewed

### 1.2.1 General Statement

This TSD has been developed by reviewing and using portions of the following documents and standards:

- a) The Manitoba Gaming Commission document titled "Technical Integrity Standards – Break Open Tickets".
- b) The Alcohol and Gaming Commission of Ontario, Gaming Registration and Lotteries document titled "Standards for Suppliers of Goods and Services – Break Open Tickets".
- c) The North American Gaming Regulators Association (NAGRA) document titled "Standards on Pull-Tabs".

## 1.3 Purpose of TSD

### 1.3.1 Purpose

The Purpose of this TSD is as follows:

- a) To provide regulatory guidance to manufacturers, suppliers and purchasers of Pull Tab (Break Open) Tickets by providing Technical Integrity Standards for Pull Tab (Break Open) Tickets, their production, testing and distribution.
- b) To eliminate subjective criteria in analyzing and certifying Pull Tab (Break Open) Tickets.
- c) To test those criteria that impacts the credibility and integrity of Pull Tab (Break Open) Tickets.
- d) To create a TSD that will ensure that Pull Tab (Break Open) Tickets used in lottery schemes in the Province of British Columbia meet the tests for fairness, honesty, security, and auditability.
- e) To recognize that except where specifically identified in this TSD, testing is not directed at health or safety matters. These matters are the responsibility of the manufacturer of the tickets.
- f) To construct a TSD that can be easily changed or modified to allow for any changes in new technology, security and/or production methods.
- g) To construct a TSD that does not specify any particular method or technology. The intent is instead to allow a wide range of methods and technologies to be used to comply with this TSD, while at the same time, to encourage new methods and technologies to be developed.

### 1.3.2 No Limitation of Technology and/or Production Methods

One should be cautioned that this TSD should not be read in such a way that limits the use of future technology and/or production materials and methods. This TSD should not be interpreted that if the technology and/or production materials and methods are not mentioned, then it is not allowed. GPEB will consult with BCLC, Independent ATF's, and other jurisdictions during any review of this TSD. GPEB will make any changes deemed necessary, utilizing industry best practices and incorporating new minimum standards for any new technology and/or production materials and methods that may be developed.

Note: Although BCLC may recommend that particular changes be made to this TSD, the ultimate authority to approve changes rests solely with GPEB.

## 1.4 Other TSDs That May Apply

### 1.4.1 Other TSDs

This TSD covers the actual requirements for Pull Tab (Break Open) Tickets. The following other TSDs and documents may also apply:

- a) None.

## 1.5 Definitions

### 1.5.1 In this Standard

“**ATF**” means Accredited Testing Facility. ATF's are approved by GPEB for the testing of lottery products and gaming equipment being used or proposed for use in the Province of British Columbia.

“**BCLC**” means the British Columbia Lottery Corporation.

“**Flare**” means the board or placard that accompanies each unit of Pull Tab (Break Open) Tickets and that has printed on or affixed to it the following information:

- a) The game name;
- b) The BCLC name or distinctive logo;
- c) The ticket count;
- d) The prize structure, including the respective winning symbol or number combinations with the number of winning symbol or number combinations for each unit of Pull Tab (Break Open) Tickets by prize denomination, ;
- e) The cost per play; and
- f) The game serial number.

“**Game Name**” means the recognizable name or theme assigned to the game.

“**Game Number**” means the unique number designated to each game for inventory and reporting purposes.

“**GPEB**” means the Gaming Policy Enforcement Branch.

“**Pull Tab Ticket**” also known as a “**Break Open Ticket**” means a game piece used in a game of chance which is made of cardboard and has one or more perforated window tabs that conceal winning and non-winning numbers or symbols which are revealed by tearing off the covering tab or tabs.

“**Payout Structure**” means the total ticket count, within one unit, the number of winning combinations at each prize level, the collective value of all prizes to be awarded, and the profit built in to the game by the manufacturer.

“**Serial Number**” means the unique identifier assigned by the manufacturer identifying a specific unit of Pull Tab (Break Open) Tickets. A serial number may be numeric, alpha, or a combination of numeric and alpha characters.

“**Unit**” means the game-specific number of Pull Tab (Break Open) tickets that encompass a single prize payout structure and are identified by the same serial number. Also known as a “deal”.

## 2 Submission Requirements

### 2.1 Introduction

#### 2.1.1 General Statement

This section shall govern the type of information that is, or may be required to be submitted by the submitting party in order to have Pull Tab (Break Open) Tickets tested to this TSD. Where the information has not been submitted or is not otherwise in the possession of BCLC, GPEB and/or the ATF, the submitting party shall be asked to supply additional information. Failure to supply the information may result in denial in whole or in part of the submission and/or lead to testing delays.

#### 2.1.2 Previous Submission

Where BCLC, GPEB and/or the ATF have been previously supplied with the information on a previous submission, duplicate documentation is NOT required, provided that the previous information is referred to by the submitting party, and those documents are easily located at BCLC’s facilities, GPEB’s facilities and/or the ATF’s facilities. Every effort shall be made to reduce the redundancy of submission information.

## **2.2 Submissions**

### **2.2.1 Submission Letter**

Each request for certification shall include a submission letter/email on company letterhead forwarded to GPEB or BCLC. The letter/email should include the following:

- a) A formal request for certification specifying British Columbia as the jurisdiction for which the Pull Tab (Break Open) Ticket will be approved;
- b) The Pull Tab (Break Open) Ticket requested for certification including the game name, game serial number, and any other information that uniquely identifies the game; and
- c) A contact person who will serve as the main point of contact for questions raised during evaluation of the submission. This may be either the person who signed the letter or another specified contact.

### **2.2.2 Submission of Other Materials and/or Documentation**

Each submission shall also include the following additional materials and/or documentation:

- a) Detailed Game Specifications including (but not limited to):
  - i). Colour Print (Front/Insides/Back);
  - ii). Front/Inside Colour Key;
  - iii). Rules of play, game format and restrictions;
  - iv). Payout Structure.

On completion of the production print run the following will be supplied and will form part of the submission:

- a) Manufacturers Lab Report;
- b) Manufacturers Security Test Report;
- c) Sample Units (non-winners only). The quantity to be determined and specified by BCLC in consultation with GPEB.

### **2.2.3 Print Re-Orders**

Where a Pull Tab (Break Open) game has previously been certified for use in the Province of British Columbia, a print re-order will be exempted from the requirement of a full submission if the conditions set out in Section 2.1.2 of this TSD have been met and:

- a) There have been no changes or alterations to the ticket design, construction or production, and
- b) All numbering and codes retain the design specifications as noted in their respective Detailed Game Specification Document with the exception of control validation numbering, win codes, and game serial numbering.

## **3 Construction Standards**

### **3.1 Minimum Information**

The minimum information printed on a Pull Tab (Break Open) Ticket must include:

- a) Specific Game Name;
- b) BCLC and/or its distinctive logo;
- c) Price per individual Pull Tab (Break Open) Ticket;
- d) Minimum five character serial number that is unique to that unit;
- e) Number of winners, respective winning number(s) or symbols(s), and prize amounts, or a flare must be included giving that information; and
- f) Current messaging related to Problem Gambling Program.

## 3.2 Game Design and Construction

All Pull Tab (Break Open) tickets must be designed, constructed, glued, assembled and collated in such a manner as to be fair, honest and secure. It must not be possible to determine a winning ticket without removing the tabs or otherwise uncovering the symbols and/or numbers.

### 3.2.1 Game Format

- a) Where game design uses non-winning symbols that are separate and distinct from winning symbols, windows containing a non-winning combination should be made up of a mixture of winning and non-winning symbols. Non-winning combinations may be repeated within a window but must be varied in window locations throughout the unit. The unit must be checked and verified to ensure that three (3) identical non-winning symbols never appear in a row horizontally, vertically, or diagonally.
- b) Where game design uses the same symbols for both winning and non-winning combinations, symbols will be scrambled throughout the unit. Non-winning tickets will never contain a winning combination in a row horizontally, vertically, or diagonally.
- c) Winning symbol patterns will be randomly and evenly distributed over all of the ticket windows.
- d) Where a Pull Tab ticket forms part of a combination ticket with a scratch and win instant ticket, the Pull Tab portion will comply with the standards set out in this TSD.

### 3.2.2 Payout Structure

- a) The design of the payout structure for each unit of game play will provide a theoretical return to player of no less than 50%. The calculation of percentage return to player (%RTP) is based on the total retail value of all prizes offered for that unit of game play divided by the total retail value of the number of tickets printed for each unit of game play, expressed as a percentage. The actual %RTP may vary based on actual sales and prize redemptions.
- b) For games where some or all of the prizes are not cash (e.g. merchandise, trips, experiential prizes, etc.), the payout structure for each unit of game play will provide a theoretical return to player of no less than 50%. The retail valuation for the non-cash prizes will be the full retail price (e.g. the manufacturer's suggested retail price (MSRP), the trip supplier's published price, or comparable retail valuation for any prize) inclusive of all applicable taxes. The calculation of the %RTP is based on the total retail value of all prizes offered for that unit of game play divided by the total retail value of the number of tickets printed for each unit of game play, expressed as a percentage. The actual %RTP may vary based on actual sales and prize redemptions.
- c) All high tier prizes identified in a payout structure must be guaranteed by the manufacturer for each unit.

### 3.2.3 Card Stock

- a) All Pull Tab (Break Open) Tickets must be manufactured from high quality and environmentally acceptable types of paper stock with at least one component of the game piece having a minimum 12 point weight.
- b) There must be no variation of the uniformity of thickness that makes it possible to determine winning or non-winning Pull Tab (Break Open) Tickets.
- c) The ticket must be constructed to ensure a certain rigidity to ensure tickets are not easily damaged in handling at retail outlets while retaining the mandatory dimensions required for reliable vending through mechanical vending machines.

### 3.2.4 Opacity

- a) The Pull Tab (Break Open) Ticket must be constructed so that concealed numbers or symbols cannot be viewed or determined from outside the ticket using a high intensity lamp of up to and including 500 watts, with or without a focusing lens.

- b) Protection must be provided using one (or a combination of more than one) of the following:
  - i). opaque paper cardstock
  - ii). aluminum foil cardstock
  - iii). Metallic cardstock

### **3.2.5 Printing**

- a) It must not be possible to detect or pick out winning Pull Tab (Break Open) Tickets through variations in print quality, print registration, graphics or colours.
- b) Symbols must be positioned within each window to allow for a minimum quiet zone from the top and bottom edges of the symbols to the perforations of 1/12" or 2mm.
- c) The numbers or symbols must be fully visible in the window and must be centered so that no part of a symbol or number remains covered when the tab is removed.
- d) There shall be a high degree of colour consistency on all tickets. All type and artwork reproductions shall be clear and sharp with no broken characters, identifying marks or hairlines, and with uniformity of ink colour/hues and coverage.

### **3.2.6 Assembly and Cutting**

- a) The ticket must have substantial and uniform lamination to prevent undetectable separation of the ticket. Sealing must occur on all four edges and between the Pull Tab tabs. Products used in the gluing process are to be environmentally acceptable.
- b) The die cut openings will be centered top to bottom and side to side on each ticket. The opening tabs of each ticket shall be perforated along the horizontal edges of the tab and along one end of the tab to allow easy opening. It must not be possible to distinguish winning and non-winning tickets within a unit based on perforation location, or any other distinguishing marks near or around ticket windows.
- c) It must not be possible to detect winning or non-winning Pull Tab (Break Open) Tickets from the appearance of a cut edge or any variation of the uniformity of ticket dimension.

### **3.2.7 Randomization**

- a) Contributing to the fairness of a game, all winning Pull Tab (Break Open) Tickets must be randomly mixed and evenly distributed among other Pull Tab (Break Open) Tickets within a unit.
- b) Randomization is used to eliminate any pattern between units, or portions of units, from which the location or approximate location of any winning Pull Tab (Break Open) Ticket may be determined or that allows the possibility of prize manipulation or "pick out".

### **3.2.8 Security**

- a) A unique symbol or printed security device, such as a specific number keyed to particular winners, or the name of the symbol or some of the symbol colours changed for a winner, or other similar protection must be placed in the winning windows.
- b) Each ticket within a unit must bear the same serial number. The serial number must not fluctuate in positions so that winning and non-winning tickets can be located in a unit or between units.
- c) There must not be more than one serial number in a unit. The serial number used on a unit may not be repeated for that same game number within a three year period.
- d) Other security features may be incorporated to provide a means of confirming the legitimacy of a winning ticket or in detecting altered or counterfeited tickets. These features may include (but are not limited to):
  - i). UV Fluorescent Printing
  - ii). Benday Security Patterns
  - iii). Validation Bar Codes.

### 3.2.9 Testing

- a) Quality assurance and Security testing of the submission may take place in BCLC testing facilities, at the Manufacturer's testing facilities, at the ATF's facilities, or a combination of these facilities and is at the discretion of GPEB (in consultation with BCLC).

## 4 Distribution Standards

### 4.1 Shipping Requirements/Ticket Delivery

- a) Each unit's package, box, or other container must be sealed at the point of manufacture with tamper evident seals or tape, including a warning to the purchaser that the units may have been compromised if the package, box or other container was received by the purchaser with evidence of tampering. The seal or tape must be visible from outside the package, box, or container and must be of such construction as to guarantee that should the container be opened or otherwise tampered with, evidence of the opening or tampering would be easily detected.
- b) A unit's serial number shall be clearly and legibly placed on the outside of the unit's package, box or other container, or be viewable from the outside of the box.

## 5 Duties of Manufacturer and Supplier

### 5.1 Duties of Manufacturer

- a) Each registered manufacturer of Pull Tab (Break Open) Tickets shall ensure that all Pull Tab (Break Open) Tickets sold and/or supplied for use in British Columbia comply with these standards.
- b) The manufacturer shall develop internal control procedures that enable it to track Pull Tab (Break Open) Ticket units from the point of manufacture to the point of transfer of ownership to BCLC or a registered gaming equipment supplier.
- c) At minimum, the manufacturer shall maintain the following records and information:
  - i). Copies of all purchase orders for Pull Tab (Break Open) Tickets;
  - ii). Copies of shipping documents verifying shipments of Pull Tab (Break Open) Tickets and invoices;
  - iii). Game name and game number sold;
  - iv). Number of Pull Tab (Break Open) Ticket units sold by serial number;
  - v). Date Pull Tab (Break Open) Ticket units sold; and
  - vi). Name and address of registered gaming equipment supplier (If applicable).
- d) The manufacturer will maintain all records for a period of 5 years and make those records available to BCLC and/or GPEB on request and within a reasonable time for the purpose of auditing.

### 5.2 Duties of Supplier

- a) Each registered supplier of Pull Tab (Break Open) Tickets shall ensure that all Pull Tab (Break Open) Tickets sold and/or supplied for use in British Columbia comply with these standards.
- b) The supplier shall develop internal control procedures to track the Pull Tab (Break Open) Ticket units sold to their customers and account for all Pull Tab (Break Open) Ticket units purchased, sold or in inventory.
- c) At minimum, the following information shall be recorded on a monthly basis:
  - i). Copies of all purchase orders for Pull Tab (Break Open) Tickets;
  - ii). Copies of shipping documents verifying shipments of Pull Tab (Break Open) Tickets and invoices;
  - iii). Game name and game number sold;
  - iv). Number of Pull Tab (Break Open) Ticket units sold by serial number;

- v). Date Pull Tab (Break Open) Ticket units sold; and
  - vi). Name and address of registered gaming equipment manufacturer (If applicable).
- d) The supplier will maintain all records for a period of 5 years and make those records available to BCLC and/or GPEB on request and within a reasonable time for the purpose of auditing.

### **5.3 Duties of BCLC**

- a) BCLC shall develop internal control procedures to track the Pull Tab (Break Open) Ticket units sold to their retailers and account for all Pull Tab (Break Open) Ticket units purchased, sold or in inventory. Inventory information will include:
- i). Game Name and Game Number;
  - ii). Serial number of the units;
  - iii). Date and quantity of the Pull Tab (Break Open) Ticket units that were placed in, withdrawn from and on hand in inventory;
  - iv). Name of the individual withdrawing Pull Tab units from the inventory; and
  - v). Any variance between quantities listed in inventory records and physical counts of inventory, and reasons for the variance.
- b) BCLC will maintain all records for a period of 5 years and make those records available to GPEB on request and within a reasonable time for the purpose of auditing.

## **6 Defective Tickets and Ticket Destruction**

### **6.1 Unacceptable Ticket(s) During Production**

- a) At any time during the cutting and boxing stages, should a Pull Tab (Break Open) Ticket or series of tickets bearing the same serial number become defective or not pass quality control, all tickets bearing that serial number must be removed from the production run.
- b) Production records shall indicate when, why and by whom that serial number unit was removed. Records shall also indicate when and by whom the Pull Tab (Break Open) Tickets were destroyed.
- c) All Pull Tab (Break Open) Tickets and related materials removed from live product line(s) that are to be destroyed by the manufacturer must have the signature of two (2) of the manufacturer's authorized employees.
- d) The manufacturer/supplier will advise BCLC in writing that the shipment will not have those serial numbered units which were destroyed during production.

### **6.2 Live Ticket Destruction**

- a) All live Pull Tab (Break Open) Tickets that are destroyed are to be accounted for by way of a Ticket Destruction Certificate requiring two verification signatures. The Ticket Destruction Certificate shall be completed reflecting the date, product destroyed, the number of units and serial numbers.

### **6.3 Defective Live Ticket Reporting**

- a) BCLC must immediately advise GPEB in writing if any live Pull Tab (Break Open) Ticket or series of tickets are found to be defective in manufacture or design or have been altered, and must not use such ticket(s) until the further use has been approved in writing by GPEB.