

Gambling Impact Society (NSW)

Submission

Inquiry into the advertising and promotion of gambling services in sport

This is a brief submission to amend and update our original submission on related gambling issues in 2011, along with previous submissions to the Productivity Commission 2009 inquiry into gambling and the joint select committee inquiries into gambling reform 2010 - 2012. We assume you are also drawing from these. We are happy to make additional comments at any public hearing. Our main points for consideration are summarised below:

- We continue to be concerned at the growth in sponsorship relationships between sports groups and betting organisations resulting in intrusive advertising and promotions through public media particularly at public sports events. We strongly maintain this is to the detriment of the community's enjoyment of leisure activities without gambling and believe this to be in direct conflict with the terms of the NSW Responsible Gambling policy of "promoting a culture of responsible gambling".
- The relationship between sports commentary and betting promotions has become so ingrained that even journalists in the media seem to collude with this culture by "advertising" betting odds in the articles they may be writing on the sport (as highlighted by a recent ABC TV Media Watch article). It is to the detriment of our community if such normalisation of sports betting can develop unchecked.
- Contrary to effective public health policy, many wagering/betting organisations promote "irresponsible" messaging in relation to gambling. As an example the branding of a NT sport betting website "Bet 24/7" by very title is contrary to the sentiments spelt out in such policy. How can promoting betting 24hrs a day be promoting responsible gambling behaviour? This is a good example of the inconsistencies in government policy on gambling across the board which allows the public promotion of one form of gambling whilst restricting the promotion of others, for example EGMs. All gambling activities have inherent public health harms and policy and regulation need to be developed to consistently address them.
- Some individual betting companies appear particularly aggressive in the market place. Consumers have raised concerns about the nature of Tom Waterhouse promotions as being particularly prevalent - where one only has to turn on a computer or the television to have him intrusively promoting his

gambling business. By contrast where are the public health warnings about gambling.

- Concerns about this level of public gambling promotion have been raised with our organisation on a regular basis by members of the general public through our website and in conversations over the past few years. It is evident there is considerable community concern on this issue.
- In-game promotion and the integration of gambling into commentary and coverage of sports is a major concern. As depicted on Insight (SBS) parental concern is high with children as young as seven demonstrating keen interest in and knowing the odds of their favourite teams. There is a concern that these promotions are negatively affecting children and in a sense “grooming” them for future betting.
- Betting promotions at sporting events, and particularly “in-line” betting, encourage impulsive behaviour. Problem gambling is specifically linked to the inability to control impulses. Add to this ready access to mobile technology these betting promotions could be considered a direct risk for increasing problem gambling in the community.
- Similar to public health policy development for tobacco control and EGM/pokies gambling in NSW, in the interests of public health and safety we believe public advertising and promotions for gambling should be banned in total. It is particularly important at events involving children and at places where children are likely to gather such as schools, community centres, shopping centres etc.
- The development of new technologies such as mobile phones, smart phones and interactive television create more extensive and intrusive forms of betting activity. They are also mediums particularly attractive to youth and there is already evidence that young males (18 -24) are a high-risk group for developing gambling problems (Neilsen et al, 2006 and Sprotson et 2012). These mediums need to have tighter regulation with regards gambling opportunities, promotions, advertising and incentives to gamble.
- We are aware that internet gambling is prohibited in Australia i.e. there are no licensed internet gambling sites in Australia. Yet online betting and wagering is prolific and has limited protections for consumers and minimal harm

minimisation strategies in situ, or regulations in place. We strongly recommend increased consumer protection and regulation of this industry.

- The opportunity to bet on almost anything through betting exchanges such as Betfair would seem contrary to effective public health management of gambling in Australia and requires more effective regulation.
- Credit card betting is a high risk activity and one specifically prohibited for other forms of gambling. e.g. poker machine gambling in NSW. Yet online wagering and sports betting sites permit credit card betting. Once again there is inconsistency in gambling public policy. Credit card betting should not be possible for any form of gambling in Australia.
- There is sufficient evidence, as documented regularly and most recently in the media, that sports betting influences match fixing and corruption. Increased regulation should be aimed at addressing these issues.

In conclusion, the Productivity Commissions 2010 recommended a consumer protection and public health model for gambling in Australia. We strongly recommend that **all gambling** needs consideration under this umbrella and appropriate National regulation and policy needs to be developed. This needs to reflect consistency with, and strengthen, harm minimisation policies already in existence for other forms of gambling (EGMs) and further develop harm reduction strategies across all forms of gambling in Australia.

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