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**Submission to the Inquiry into the Interactive Gambling Amendment
(Prohibition on Credit Card Use) Bill 2020**

The Gambling Impact Society NSW (GIS) is a consumer based ACNC registered Health Promotion Charity. Our aim is to reduce gambling harms for individuals, families and communities through the provision of community education, professional training services, community information, resource development and community advocacy.

The GIS Management Committee is made up of people with lived experience of gambling harms and recovery, along with health professionals and representatives of community groups. At the core of our guiding principles is understanding the lived experience of gambling harms and raising the voices of those who have been harmed by gambling. We therefore welcome the opportunity into contribute to this inquiry.

Since our inception in July 2000, we have been increasingly aware of the changing landscape of gambling in Australia, as the gambling industry refines its products and marketing to align with new technology. Historically the greatest shift in land-based gambling was the shift from the mechanical reeled 'one armed bandits' of the 1950s to the introduction and expansion of more complex computer based Electronic Gaming Machines (EGMs) (known as poker machines), in Australia during the 1990's. EGMS are the major contributor to current gambling harms in Australia.

These changes in gambling technology have had significant impacts upon individuals, families and communities, with over half (\$12.5 billion) of Australian gambling losses (\$24.8 billion) attributable to EGMs (Queensland

Government Statisticians Office [QGSO], 2019). There is much to learn from these circumstances to inform the current development of Internet based gambling products, as they present new challenges for regulation and consumer protection.

Research indicates young men in particular are a high-risk group for harms from Internet gambling (Gainsbury, 2015) and that online gaming and wagering is becoming an increasing area of concern. Reports to the GIS through our consumer membership base, indicates Internet gambling is an easily accessible form of gambling and that the combination of credit card use with mobile technology and Internet gambling, means there are significant risks of harm. In particular, consumers have raised concerns with us about the ease with which they can use credit cards for Internet gambling compared to land-based gambling products, and how quickly they can incur large debts. Other related issues are the lack of identity checks in the online environment and the associated risks of under age gambling and the use of other family member's credit cards.

An overview of research of Internet gambling, conducted by Gainsbury (2015), indicates Internet gambling as having some unique features and risks of harms, particularly for vulnerable populations. These risks are associated with "constant availability, easy access and ability to bet for uninterrupted periods in privates, facilitated by the interactive and immersive internet environment" (Gainsbury, 2015:186). In particular Gainsbury, notes:

The use of digital forms of money (e.g. credit cards, electronic bank transfers and e-wallets) appears to lead to increased gambling and losses, particularly for problem gamblers, as people feel that they are not spending 'real' money. (Gainsbury, 2015:186).

Research indicates 19–28 % of online gamblers report it is easier to spend more money online, while 15 % consider this form to be more addictive than land-based gambling (Gainsbury, 2015). Research also identifies that people

who have already experienced harms from land-based gambling may be at further risk for Internet gambling problems (Gainsbury, 2015).

The GIS notes two national inquiries into gambling in Australia (Productivity Commission 1999 and 2010) have recommended public health and consumer protection approaches to gambling in Australia. Public health measures are generally regarded as 'upstream' interventions with a focus upon prevention and early intervention, rather than solely focusing on treating the people most severely affected, and with the opportunity to address problem gambling at the grassroots level (Price et al., 2021; Roberts & Townsend, 2009; South Australian Council of Social Service [SACOSS], 2008). The GIS actively promotes a public health and consumer protection approach to addressing all gambling in Australia.

As stated in the proposed Interactive Gambling Amendment (Prohibition on Credit Card Use) Bill 2020, the prohibition of credit card gambling is already in place for poker machine gambling in Australia. In the interest of individuals, families and communities, the GIS recommends this harm minimisation and consumer protection strategy should be also be applied to Internet gambling in Australia.

The GIS strongly supports the prohibition of credit card gambling in the online/Internet environment and therefore supports the proposed legislative amendment.

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