

## **Gambling Impact Society (NSW) Submission**

**With regards**

### **The inquiry into interactive and online gambling and gambling advertising and the Inquiry into the Interactive Gambling and Broadcasting Amendment (Online Transactions and Other Measures) Bill 2011**

This is a brief submission with regards these two inquiries. Given that more extensive submissions have been made by ourselves recently onto the Productivity Commission 2009 inquiry into gambling and the joint select committee on gambling reform. We assume you are also drawing from these. We would be happy to make additional comments at any public hearing. Our main points for consideration are summarised below:

- We are concerned at the significant growth in betting advertising and promotions through public media particularly at public sports events. We believe this to be in direct conflict with the terms of the NSW Responsible Gambling policy of “promoting a culture of responsible 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.
- Similar to public health policy development for tobacco control and EGM/pokies gambling in NSW, we believe public advertising and promotions for gambling should be banned.
- The development of new technologies such as mobile phone. 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 (Nielsen et al, 2006). These mediums need to have tighter regulation with regards gambling opportunities, promotions, advertising and incentives to gamble. For example we are aware the odds of winning on practise games for online gambling are superior to those offered when in actual bet mode. This constitutes a form of grooming and inducement to gamble. Under regulations for poker machines such practise would be deemed irresponsible and prohibited. Once again we see inconsistency across gambling regulation and policy practice. It is unfair practice and should be eliminated.
- We are aware that internet gambling is prohibited in Australia i.e. there are no licensed internet gambling sites in Australia. However off shore sites have access to our population and appear to have no limits or regulations placed upon them in doing so. We believe this needs to be addressed either by blocking such site access (as in NZ) or by regulating access.
- There is sufficient evidence, as documented regularly in the media, that sports betting influences match fixing and corruption. Increased regulation should be aimed at addressing these issues.

- 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.
- The fact that most of these forms of betting allow credit cards to be used for betting is a high risk activity and one specifically prohibited for other forms of gambling e.g. poker machine gambling in NSW. Once again there is inconsistency in gambling public policy. Credit card betting should not be possible for any form of gambling.
- Compared to other forms of gambling such as Electronic Gaming machines, there would appear to be considerable weakness in the regulation of online, interactive and mobile phone gambling regulation and policy practice. There are minimal consumer protections or clear support for those who may be developing problems with these forms of gambling.

In conclusion, the Productivity Commission (2010) recommended a consumer protection and public health model for gambling in Australia. We believe **all gambling** needs to be considered under this umbrella and appropriate regulation and policy needs to be developed. This needs to reflect consistency with those policies already in existence for EGM gambling and considered in light of the recommendations of the Productivity Commission report 2010 and proposed gambling reforms.

Kate Roberts

Chairperson

11/7/11