



AUSTRALIAN HOTELS ASSOCIATION

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Committee Secretary
House of Representatives Standing Committee on Social Policy and Legal Affairs
PO Box 6021
Parliament House
Canberra ACT 2600

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Inquiry into online gambling

Dear Committee Secretary,

I am writing in response to the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into on online gambling.

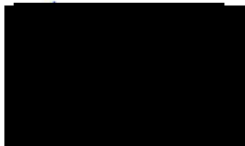
To assist the inquiry, I have **attached** a table summarising the various controls in place at the state/territory and federal jurisdictions for retail and on-line gambling.

Hotels do not offer on-line gambling but instead are licenced to offer gambling on premise in a retail environment. Gambling in hotels is offered in three main ways; TAB, electronic gaming, and Keno. Each of these forms of gambling within hotels are bound by a range of state and territory regulations. Often these regulations apply to the other main venues for retail gambling including places such as clubs, racecourses and casinos.

In essence, hotels don't promote gambling on free to air television or radio. External advertising on the venues is quite static and limited (e.g., TAB, Gaming). Importantly, any advertising of gambling odds (e.g., Sky Racing TV) is limited to areas in hotels that children are not permitted to enter. Hotels might also promote some forms of entertainment via direct communication to patrons such as online newsletters. However, patrons have the opportunity to unsubscribe at any time.

I am available to assist with any questions.

Your faithfully,



STEPHEN FERGUSON
AHA NATIONAL CEO

Select Gambling Advertising Controls by Jurisdiction

National	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
KEY LEGISLATION / CODES OF CONDUCT								
<p>National:</p> <ul style="list-style-type: none"> • Gambling Advertising Ad Standards • ACMA Rules for Gambling Ads • AANA Code of Ethics • AANA Wagering Advertising Code • Broadcast Industry Codes of Practice • ACMA (2019) Gambling advertising in Australia: Consumer & advertising placement research • Australia Institute (2022) Polling- Advertising- on-TV • NSW Gov. (2022) Public Interest Debate: Gambling Advertising 	<ul style="list-style-type: none"> • Gambling and Racing Control (Code of Practice) Regulation 2002 • Code of Practice - ACT Gambling and Racing Commission 	<ul style="list-style-type: none"> • Gambling advertising restrictions - Liquor & Gaming NSW • Guideline GL4015: Gambling advertising & inducements - Liquor & Gaming NSW • Gaming Machine Act 2001 • Gaming Machines Regulation 2019 	<ul style="list-style-type: none"> • NT Code of Practice for Responsible Gambling 2022 Here 	<ul style="list-style-type: none"> • Queensland Responsible Gambling Code of Practice (2015) 	<ul style="list-style-type: none"> • Gaming Machines Gambling Code of Practice (July 2022) • Casino Gambling Code of Practice (July 2022) • Authorised Betting Operations Gambling Code of Practice (July 2022) 	<ul style="list-style-type: none"> • Responsible Gambling Mandatory Code of Practice for Tasmania (March 2020) • Gambling Licence Rules by Sector • Gambling Product Advertising Standards (November 2017) • Gambling Product Advertising Standards: Fact Sheet 	<ul style="list-style-type: none"> • Gambling Regulation Act 2003 • Gambling Regulation Act 2003: Ministerial Direction (September 2018) • Gambling Regulation Act 2003: Ministerial Direction (February 2020) • Ministerial directions VGCCC 	<ul style="list-style-type: none"> • WA Gambling Advertising and Inducements Guide Here

Select Gambling Advertising Controls by Jurisdiction

National	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
COMPLIANCE WITH AUSTRALIAN ASSOCIATION OF NATIONAL ADVERTISERS (AANA) CODE OF ETHICS								
Pubs & Clubs			Mandatory	Recommended	Mandatory	Mandatory	Mandatory	
Casinos			Mandatory	Recommended	Mandatory	Mandatory	Mandatory	Mandatory
Wagering	Complies	Complies	Mandatory	Recommended	Mandatory	Mandatory	Mandatory	Mandatory
COMPLIANCE WITH AUSTRALIAN ASSOCIATION OF NATIONAL ADVERTISERS (AANA) WAGERING ADVERTISING CODE								
Wagering	Complies	Complies	Complies	Complies	Mandatory	Complies	Complies	Mandatory
COMPLIANCE WITH BROADCAST INDUSTRY CODES OF PRACTICE								
Pubs & Clubs			Mandatory		Mandatory			
Casinos			Mandatory		Mandatory			Mandatory
Wagering			Mandatory		Mandatory			Mandatory
EXTERNAL GAMBLING RELATED ADVERTISING								
Pubs & Clubs	External signage advertising gaming machines or promoting a gambling activity at a venue is not permitted.	Advertising may not be on public display or accessible to the general public.	Advertising on the exterior is restricted to a statement that the venue has gaming machines only.	Advertising must not involve external signs advising of winnings paid.	Must include mandatory warning messaging.		Advertising outside the gaming machine area prohibited.	
Casinos		Advertising may not be on public display or accessible to the general public.	Advertising on the exterior is restricted to a statement that the venue has gaming machines only.	Advertising must not involve external signs advising of winnings paid.	Must include mandatory warning messaging.		Advertising outside the boundaries of the casino prohibited.	
Wagering				Advertising must not involve external signs advising of winnings paid.	Must include mandatory warning messaging.		Ban on static betting advertising on roads, bridges and public transport, and within 150 metres of public schools. Logo or name of service provider permitted on building. Advertising permitted inside	

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							premises, at a sporting ground or racecourse.	
BROADCAST MEDIA & COMMERCIAL PRINT ADVERTISING								
Pubs & Clubs		Gaming machine advertising is prohibited.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	
Casinos		Gaming machine advertising is prohibited.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	<ul style="list-style-type: none"> Promotions of entertainment or dining facilities where betting or gambling takes place are exempt. In-house TV exempt but must be restricted to adults only. 	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.	Promotions of entertainment or dining facilities where betting or gambling takes place are exempt.
Wagering	<ul style="list-style-type: none"> During programs that are classified G, C and P, gambling ads are not permitted from 6am to 8.30am and 4pm to 7pm. During other programs principally directed to children, gambling ads are 	<ul style="list-style-type: none"> During programs that are classified G, C and P, gambling ads are not permitted from 6am to 8.30am and 4pm to 7pm. During other programs principally directed to children, gambling ads are 	<ul style="list-style-type: none"> During programs that are classified G, C and P, gambling ads are not permitted from 6am to 8.30am and 4pm to 7pm. During other programs principally directed to children, gambling ads are 	<ul style="list-style-type: none"> During programs that are classified G, C and P, gambling ads are not permitted from 6am to 8.30am and 4pm to 7pm. During other programs principally directed to children, gambling ads are 	<ul style="list-style-type: none"> Banned on radio between 6.00 am and 8.30 am Mon to Fri. Banned on TV between 4.00 pm and 7.30 pm Mon to Fri. Banned during live sports broadcasts. Dedicated sports 	<ul style="list-style-type: none"> Banned on radio & TV between 6:00am - 8:30am and 4:00pm - 7:00pm The following forms of advertising are exempt from the above periods: 	<ul style="list-style-type: none"> During programs that are classified G, C and P, gambling ads are not permitted from 6am to 8.30am and 4pm to 7pm. During other programs principally directed to children, gambling ads are 	<ul style="list-style-type: none"> During programs that are classified G, C and P, gambling ads are not permitted from 6am to 8.30am and 4pm to 7pm. During other programs principally directed to children, gambling ads are

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	not permitted between 5am and 8.30pm. • News, sport and current affairs programs are exempt from this rule. • Prohibited during live sports broadcasts between 5.00am and 8.30pm	not permitted between 5am and 8.30pm. • News, sport and current affairs programs are exempt from this rule. • Prohibited during live sports broadcasts between 5.00am and 8.30pm	not permitted between 5am and 8.30pm. • News, sport and current affairs programs are exempt from this rule. • Prohibited during live sports broadcasts between 5.00am and 8.30pm	not permitted between 5am and 8.30pm. • News, sport and current affairs programs are exempt from this rule. • Prohibited during live sports broadcasts between 5.00am and 8.30pm	channels exempt.	a) advertising during a racing or sports broadcast; and b) advertising that focuses specifically on entertainment or dining facilities • Prohibited during live sports broadcasts between 5.00am and 8.30pm	not permitted between 5am and 8.30pm. • News, sport and current affairs programs are exempt from this rule. • Prohibited during live sports broadcasts between 5.00am and 8.30pm	not permitted between 5am and 8.30pm. • News, sport and current affairs programs are exempt from this rule. • Prohibited during live sports broadcasts between 5.00am and 8.30pm
ADVERTISING - RESPONSIBLE GAMBLING MESSAGING								
Pubs & Clubs	Mandatory		Mandatory	Recommended	Mandatory	Mandatory		
Casinos	Mandatory		Mandatory	Recommended	Mandatory	Mandatory		Mandatory
Wagering	Mandatory	Complies	Complies	Recommended	Mandatory	Mandatory	Mandatory	Mandatory
ADVERTISING TO LOYALTY SCHEME PARTICIPANTS								
Pubs & Clubs	Permitted with consent.	Permitted to club members with consent.			Permitted except to excluded patrons.	Prohibited	Permitted, except for distribution to people suspended or removed from loyalty schemes.	
Casinos	Permitted with consent.	Permitted to club members with consent.			Permitted except to excluded patrons.	Prohibited	Permitted, except for distribution to people suspended or removed from loyalty schemes.	Permitted with consent.
Wagering	Permitted with consent.				Permitted except to excluded patrons.	Prohibited		Permitted with consent.

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ADVERTISING ON PLAYER CARDS								
Pubs & Clubs							Prohibited	
Casinos							Prohibited	
Wagering								
ADVERTISING, PROMOTION OR INDUCEMENTS TO EXCLUDED PLAYERS PROHIBITED								
Pubs & Clubs	Mandatory				Mandatory	Mandatory		
Casinos	Mandatory				Mandatory	Mandatory		
Wagering	Complies	Complies	Complies	Complies	Mandatory	Mandatory	Mandatory	
DOES NOT PROMOTE ALCOHOL CONSUMPTION WHILST GAMBLING								
Pubs & Clubs	Mandatory		Mandatory	Recommended	Mandatory	Mandatory	Mandatory	
Casinos	Mandatory		Mandatory	Recommended	Mandatory	Mandatory	Mandatory	
Wagering	Mandatory	Complies	Complies	Recommended	Mandatory	Mandatory	Mandatory	
NOT BE FALSE, MISLEADING OR DECEPTIVE								
Pubs & Clubs	Mandatory		Mandatory	Recommended	Mandatory	Mandatory	Mandatory	
Casinos	Mandatory		Mandatory	Recommended	Mandatory	Mandatory	Mandatory	Mandatory
Wagering	Mandatory	Complies	Complies	Recommended	Mandatory	Mandatory	Mandatory	Mandatory
ADVERTISING, PROMOTION OR INDUCEMENTS TO GAMBLE								
Pubs & Clubs	Prohibited	Prohibited	Prohibited	Prohibited	Prohibited	People must not be offered free vouchers (or tokens and the like) of a value greater than \$15 which can be used for gambling purposes.		
Casinos	Prohibited	Prohibited	Prohibited	Prohibited	Prohibited	People must not be offered free vouchers (or tokens and the like) of a value greater than \$15 which can be used for gambling purposes.		Prohibited
Wagering	Prohibited	Prohibited		Prohibited	Prohibited	People must not be offered free vouchers (or	Prohibited	Prohibited

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National	ACT	NSW	NT	QLD	SA	TAS	VIC	WA
						tokens and the like) of a value greater than \$15 which can be used for gambling purposes.		
ADHERES TO COMMUNITY STANDARDS: NOT BE OFFENSIVE OR INDECENT								
Pubs & Clubs			Mandatory	Recommended	Mandatory	Mandatory	Mandatory	
Casinos			Mandatory	Recommended	Mandatory	Mandatory	Mandatory	Mandatory
Wagering	Complies	Complies	Complies	Recommended	Mandatory	Mandatory	Mandatory	Mandatory
DOES NOT PRESENT REASONABLE STRATEGY FOR FINANCIAL BETTERMENT								
Pubs & Clubs	Mandatory		Mandatory	Recommended	Mandatory	Mandatory	Mandatory	
Casinos	Mandatory		Mandatory	Recommended	Mandatory	Mandatory	Mandatory	
Wagering	Mandatory	Complies	Complies	Recommended	Mandatory	Mandatory	Mandatory	
DOES NOT TARGET MINORS OR VULNERABLE GROUPS								
Pubs & Clubs	Mandatory			Recommended	Mandatory	Mandatory		
Casinos	Mandatory			Recommended	Mandatory	Mandatory		Mandatory
Wagering	Mandatory	Complies	Complies	Recommended	Mandatory	Mandatory	Complies	Mandatory