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**Submission to the Senate Standing Committees on Environment and Communications on the *Communications Legislation Amendment (Online Content Services and Other Measures) Bill 2017***

The Flinders Centre for Gambling Research (FCGR) welcomes the opportunity to provide feedback on proposed Communications Legislation Amendment (Online Content Services and Other Measures) Bill 2017.

The Flinders Centre for Gambling Research (FCGR) conducts studies into the health, social, economic and political impact of gambling on society including the community, families and individuals. FCGR also aims to influence the formulation of policy in this area. The Centre operates as part of the Discipline of Psychiatry in the School of Medicine. It is situated in the Margaret Tobin building on Flinders University Campus. FCGR works with public sector agencies, universities and funding bodies. Researchers at the centre have developed a number of national and international research collaborations in the area of problematic gambling. The Centre serves to enhance community knowledge and understanding of the phenomenon of problematic gambling and use this knowledge to improve the lives of people who are adversely affected by gambling. The FCGR's long standing collaboration with the Statewide Gambling Therapy Service has led to the development of a world leading and unique treatment model designed specifically to address problem gambling. The Statewide Gambling Therapy Service is a free service for any South Australian experiencing difficulties with gambling behaviour. The service offers an evidence-based Cognitive Behavioural Therapy program that has been tested and evaluated by the FCGR. The program is highly effective in helping people overcome their urge to gamble.

FCGR welcomes the government's intent to place restrictions around gambling advertising on online sports coverage. Given the integration of sport into Australian culture and the increasing availability of accessing sporting events online, there is concern Australian children face higher exposure to the advertising of gambling related products. There is evidence that the messages children derive from gambling advertisements include the idea that winning is easy, the chance of winning is high, and that gambling is an easy way to become wealthy. Furthermore, such advertisements have been reported to prompt them to gamble <https://link.springer.com/article/10.1007/s11469-009-9211-7>.

FCGR feedback concerning proposed Communications Legislation Amendment (Online Content Services and Other Measures) Bill 2017.

- The submitting organisation has concern regarding the proposed exemption for gambling advertisements for long form sporting events. Long form sporting events, such as cricket and tennis, should not be treated any differently. Viewing sporting updates online is common among young people, particularly for long form sporting matches, such as the recent Ashes series. Young people that follow test match cricket, for example, are likely to keep updated via their smart phones or other hand held devices between 5am and 8:30pm. In fact, many parents will agree, that young people are more likely to access long form sporting events (tennis tournaments, athletics tournaments including Olympic and Commonwealth games) online, than short form sporting events. Restrictions on gambling promotion should be consistent across all forms of sporting events.
- The submitting organisation shares the Australia Council for Children and the Media's (ACCM) concern pertaining to the need for Ministerial direction to trigger the process of determining a standard. Moreover, there is no detail of the conditions under which the Minister should trigger such process. The Australian Communications and Media Authority (ACMA) should be required, under legislation, to determine a standard on gambling advertising, consistent with current requirements for children's television content.
- The submitting organisation expresses concern over what it believes to be an unnecessary distinction between commentator betting odds promotion and representation venue-based promotion, and promotion in general (Schedule 8, Clause 21). Young people particularly, and indeed many adult viewers, will find it difficult to establish if a certain advertisement or promotion, sits in within the venue-based category, or general promotion. The same restrictions (before and after an event, during half time, and during delays) should apply to all forms of promotion, whether they be via commentator venue-based representation, or general promotion via identified gambling representatives.
- The submitting organisation expresses concern over the Australian Subscription Television and Radio Association's (ASTRA) proposal for the specific exclusion of gambling advertisements for fantasy sports. ASTRA's basis for exclusion, on the grounds that fantasy sports require a marginal level of skilled input and are not

based primarily on chance like traditional wagering products, is not accepted by the submitting organisation. Many gamblers involved in traditional gambling products such as horse racing, spend significant amounts of time preparing their wagers. Furthermore, fantasy sports share the same psychological mechanisms involved in more traditional wagering products (intermittent reinforcement). A further concern, is that, many fantasy sports platforms are associated with large corporations that provide traditional forms of gambling, allowing them to advertise their products across the fantasy sports sites. Gambling organisations seeking association with fantasy sports platforms, is a growing trend. Young people involved in fantasy sports, risk high exposure to gambling advertising if the proposed exclusions are accepted.

FCGR thanks Government for the opportunity to make this submission and would be pleased to be involved in further discussion.

Yours sincerely

**Flinders Centre for Gambling Research**