

## Tasmanian Gaming Commission

Level 2, 80 Elizabeth Street, HOBART, Tas 7000  
GPO Box 1374, HOBART, Tas 7001 Australia  
Telephone: (03) 6233 2475 Facsimile: (03) 6234 1728  
Email: [wagering@treasury.tas.gov.au](mailto:wagering@treasury.tas.gov.au) Web: [www.treasury.tas.gov.au](http://www.treasury.tas.gov.au)



Lyn Beverley  
Committee Secretary  
Joint Select Committee on Gambling Reform  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Ms Beverley

### **INQUIRY INTO THE ADVERTISING AND PROMOTION OF GAMBLING SERVICES IN SPORT**

I refer to the invitation from the Parliamentary Joint Select Committee on Gambling Reform for submissions to its inquiry into the advertising and promotion of gambling services in sport and offer the following for your consideration.

The Tasmanian Gaming Commission has long-held concerns about the increasing appearance of sports betting advertising on television and at major sporting events.

In recent years, the Commission has seen an increased appearance of gambling advertising during sports broadcasts on television, including the display of odds and regular updates of odds while an event is being broadcast and the use of sponsorship to promote gambling services. There is also a growing focus on gambling by television commentators who regularly quote odds and the effect of play on them. Discussion of gambling now also appears to be part of the 'normal' discourse on sport on commercial and non-commercial media during pre- and post-event coverage of speciality presentations during the week. This is a relatively new and, the Commission considers, a powerful advertising approach that is distinct from regular advertising which occurs during a programmed break from a broadcast.

The electronic scoreboards at major sporting stadiums also display gambling advertisements and odds throughout matches.

The Commission views advertising of gambling products as a significant issue. While gambling is a legitimate recreational activity, it is an adult product with inherent risks and advertising should take account of the potential adverse impact it can have for some people. Products should be advertised during adult viewing times, with any exceptions carefully regulated.

The Commission is concerned that this form of advertising portrays gambling as a normal and expected behaviour. It diverts attention from enjoying a sporting contest to winning money from the result. There is a high risk that vulnerable or disadvantaged groups may be encouraged to gamble, and without a capacity to fully understand the complexities of gambling, may develop gambling problems. The potential for harm is exacerbated by the involvement of television and radio personalities who are often regarded highly by viewers.

The Commission notes that the Productivity Commission's 2010 report acknowledged the many requirements that cover gambling advertising across Australian jurisdictions. It indicated that while there are common principles for gambling advertising across jurisdictions, regulations vary considerably across different forms of gambling. The Productivity Commission also highlighted as an emerging issue the advertising requirements around racing and sports betting.

The Commission supports a national approach to addressing advertising and related issues such as spot betting, gambling sponsorship, inducements and promotion of gambling services in sport. That approach should take account of the potential adverse impact that sports betting advertising can have on minors, people with gambling problems, people at risk of developing gambling problems and the community.

The Commission is supportive of the National Policy on Match-Fixing in Sport that state and territory Sports Ministers agreed to in June 2011. The commitment by all Australian governments to pursue nationally consistent legislation to address match-fixing, including agreements between sports controlling bodies and betting providers will provide sports controlling bodies with greater oversight of bet types and provide greater accessibility to betting information. The national approach to match-fixing in sport will be a crucial factor in ensuring the integrity of sporting codes is maintained.

A national approach to gambling sponsorship, similar to the recent focus on alcohol sponsorship should be considered. Gambling sponsorship in sport provides greater exposure of the betting operator's product through the media and is another method by which operators are entrenching and normalising their products within sports.

Inducements are a core part of promoting betting services in sport and the Commission recognises that these can lead to gambling problems. To date, the Commission has implemented a number of practices to restrict inducements offered by terrestrial gambling operators in Tasmania. However, given that an online betting operator's customer base is unlikely to be restricted, and in most circumstances will be worldwide, the Commission considers that a nationally consistent approach to this issue is appropriate.

As a related matter, the Commission notes that there is also variation across jurisdictions in the requirements for warning messages and responsible gambling messages. This includes health-related advertisements that convey warnings about the harms associated with gambling and advertisements for gambling products that include a secondary message about responsible gambling. Messages often form part of a larger educational campaign and these vary considerably across jurisdictions.

The Commission considers that it is also timely to investigate the introduction of national standard message(s) across all forms of gambling. Whether this is an issue for the Select Committee or another body, the Commission believes an assessment of the costs and benefits of a national approach would be worthwhile.

To conclude, the Commission believes that national interventions are required to prevent the 'normalisation' of gambling as it relates to major sporting and other events. The recent intrusion of gambling into the 'sporting conversation' is of concern and the Commission believes these matters are most properly and effectively addressed at the national level.

Yours sincerely

Peter Houtt  
**CHAIRMAN**

26 February 2013