

Ms Lyn Beverley
Committee Secretary
Australian Parliamentary Joint Select Committee on Gambling Reform

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Submission to the Australian Parliamentary Joint Select Committee on Gambling Reform.

Inquiry into the advertising and promotion of gambling services in sport.

Dear Ms Beverley.

Thank you for the opportunity to provide a submission to this present Inquiry.

I have testified on previous occasions about our studies into the in-ground and broadcast advertising of gambling services in sport. In 2012, our study of sports wagering advertising within Australian Football League matches found that there were on average, 58.5 episodes of in-ground marketing, and 50.5 episodes during televised broadcasts. We have also provided previous evidence about the impact of marketing on the gambling behaviours of young men.

It is very important to note that while a substantial amount of rhetoric has been about 'advertising', we have found that a much broader range of marketing strategies than commercial break advertising are used to promote wagering within sport. We have documented that a diverse range of marketing activities are used to:

- a) embed sports betting within the game;
- b) align sports betting with fans' overall experience of the game; and
- c) encourage individuals to 'bet live' during the game.

Importantly, we have observed very few visible or audible messages to counterframe industry promotion strategies.

At the time of our first study, we anticipated that there would be shifts in industry marketing strategies away from commercial break advertising towards increased embedding of marketing within sporting matches. We predicted that this would occur through broadcast and sporting team based commercial relationships. This appears to have happened. We have observed:

1. The increase in visual and commentary based cues to promote gambling and gambling products within matches.
2. The increase in visible industry advertising on sporting team uniforms.
3. The promotion of other forms of gambling (such as Keno and Lotteries).

We are particularly concerned about marketing promotions that seek to create brand awareness (or brand communities) through the integration of promotional activities with match broadcasts.

Evidence from other areas (such as alcohol and tobacco) and from our own studies suggest that it is much more difficult for individuals (adults and children) to separate out and/or avoid these forms of marketing

from the game itself. Regular 'bursts' of marketing have also been shown to increase brand awareness and recall.

There seems to have been little forward planning by the Federal Government to put in place regulatory strategies to respond to the emergence of these new promotional activities. While restricting live odds announcements during matches is an important step forward, it does very little to impact on the diverse range of marketing strategies that are either currently used, or may be used in future sporting matches.

Given previous evidence from tobacco and alcohol, it is extremely naïve to think that industry will not find alternative strategies to promote their products within sport, and reach and target new audiences. This also includes shifts to new media platforms such as social media sites and mobile technologies. Voluntary industry codes of conduct appear to have had very limited impact on the promotion of gambling during sport, particularly when there are 'exceptions' within these codes which allow advertising during peak audience viewing times.

It is also important for the Committee to note that in tobacco, sports based sponsorship was often used to circumvent broader community restrictions on the promotion of tobacco products. The banning of tobacco marketing during sporting events is seen as an important step in the anti-tobacco movement, and particularly in reducing smoking rates in younger people. While gambling and tobacco are obviously not the same, there is a clear window of opportunity to learn the lessons from tobacco and to prevent the impact of gambling marketing on both current and future gambling harm.

While harm minimization strategies are important there is an urgent need to develop a comprehensive population based approach to the prevention of harm, particularly in vulnerable population groups such as young men, and children (particularly adolescent boys).

Social advertising (sometimes termed social marketing campaigns) will be an important element in countering gambling marketing strategies within sport. However, there needs to be a much more comprehensive approach which is aligned with approaches in other key public health issues. While social advertising is important, it is only one part of the broader social marketing mix. Again, we know from other key public health issues that in order to create change, there must be a comprehensive population based approach to prevention, which includes a range of upstream, midstream, and downstream social marketing strategies. At present there appears to be an overwhelming focus on downstream (individual education and responsibility) approaches.

The work of the Australian Government National Preventative Taskforce provided a number of clear strategies for the prevention of harms associated with Tobacco and Alcohol. The following points made by the Taskforce in their Australia: The Healthiest Country by 2020 report are particularly pertinent to the Terms of Reference of this Inquiry, and are an important starting point for considering how we prevent the potential harms that may be caused by the marketing of gambling products during sport:

- "Where the market is failing, governments need to act to protect our health – particularly the health of children and adolescents. Standards need to be established, regulations imposed where necessary and consumer education provided."
- "Balanced, effective regulation and legislation, usually alongside effective and sustained public education, have been an essential element of most prevention programs to date."

However, the Taskforce notes that there is strong and often influential resistance to prevention activities – particularly from industry.

- “Despite the evidence, some influential people within the community still do not believe that prevention works, or that population-level behaviour change can occur. Vested interests such as tobacco companies will do everything in their power to discredit or dilute prevention programs.”

They also warn that ‘ad-hoc’ programs are unlikely to have an impact, and may indeed be counterproductive.

- “Inadequately funded or single, short-term and ad hoc projects and programs are unlikely to succeed. In fact, they may even be counter-productive....”

There is an urgent need to develop a comprehensive framework to respond to the new range of strategies that are being used to promote gambling during sport. The Australian community are concerned and angry about the lack of action that is being taken to curb marketing promotions during sporting activities. A comprehensive response from Government is now needed.

AProf Samantha Thomas