

JCDecaux

Out of Home Media

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19 September 2016

Community Feedback on Static betting advertising
Office of Liquor, Gaming and Racing
Department of Justice and Regulation
PO Box 18055
Collins Street East
MELBOURNE VIC 8003

Email: LiquorGamingandRacingEnquiries@justice.vic.gov.au

To whom it may concern

JCDecaux would like to take this opportunity to support the **Outdoor Media Association Submission to Static Betting Advertising Consultation in Victoria.**

The Outdoor Media Association (OMA) is the peak national industry body representing 90% of Australia's traditional and digital Out-of-Home (OOH) media display and media production companies, as well as some media display asset owners.

The Government's proposal "to limit the proliferation of advertising by wagering service providers (WSPs) by prohibiting the display of static betting advertisements on public transport infrastructure and within a certain distance of a school" is intended to:

- "address community concerns about the display of betting advertising...and its impacts on vulnerable groups such as problem and at-risk gamblers, children and adolescents
- reduce the association between sports and betting among vulnerable groups such as problem and at-risk gamblers, children and adolescents."

However, no compelling evidence has been provided to demonstrate how this proposed policy would provide these outcomes. There is no evidence linking OOH wagering advertising with increased wagering activity of minors or at-risk gamblers.

If implemented in its current form, the policy will impose a discriminatory burden on OOH advertising providers. The policy fails to recognise a number of important issues:

1. OOH advertising accounts for only 6% of wagering advertising across Australia. How can the Government justify targeting this one sector without any evidence?
2. The OOH industry makes significant contribution to the State's economy, through infrastructure development and maintenance and through profit-share with government.

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3. The self-regulatory system for advertising content in Australia is strong, and it includes, as of July 2016, a Code that regulates the content of Wagering Advertising on OOH.

It would be ineffective and inequitable for the Victorian Government to introduce a prohibition of "the display of static betting advertisements on public transport infrastructure and within a certain distance of a school". This policy would harm the OOH advertising industry without achieving its stated aims.

The OOH industry is committed to responsible advertising and is would like the opportunity to work with the Victorian Government to assess this issue and to minimise any harmful effects of this type of advertising.

Yours sincerely



Steve O'Connor
Chief Executive Officer
JCDecaux Australia