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**MORNINGTON  
PENINSULA**  
*Shire*

22 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



Dear Sir/Madam

**Static betting advertising consultation paper  
Submission by Mornington Peninsula Shire**

This submission in response to the Static Betting Advertising Consultation Paper is made on behalf of the Mornington Peninsula Shire Council noting that the short time for submissions has not enabled the matter to be reported to an Ordinary Meeting of Council. However it is known that the Council is concerned about the impact of problem gambling upon the wellbeing of Peninsula residents and has recently resolved to seek a lowering in the municipal cap on electronic gaming machines. The views expressed in this submission are aligned with that position.

The opportunity to comment on the proposal by the Hon Marlene Kairouz, Minister for Consumer Affairs, Gaming and Liquor Regulation, 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 appreciated.

**In summary**, the proposal is difficult to implement and should, in any case, be expanded to include a wider array of advertisement types if the Victorian Government's concerns "about the normalisation of gambling on sport through the proliferation of gambling advertising." (Consultation Paper, page 4) are to be effectively addressed.

See the responses below to the questions set out in the Consultation Paper for further detail

static displays could easily be made ineffective by an operator simply changing the type of sign.

7. The regulation of electronic advertising could also be effective in terms of protecting young people, during their use of sporting venues. For example, betting advertisements at these venues could be restricted to electronic advertisements only that were not to be displayed during school times or other sporting events for young people.

*What impact (economic, commercial and social) will the policy proposals have on wagering service providers, advertising agencies, public transport operators, sporting bodies or members of the community?*

8. The cost of enforcement should not be shifted to local government.

*What arrangements should the government put in place to enable wagering service providers to transition to any new arrangements?*

9. Transitional arrangements would be reasonable. A 12 year expiry date, or earlier date as specified in any contract, would align with the alternative expiry date condition in Clause 52.05-6 Major Promotion Sign of the Victoria Planning Provisions.

*What other proposals could the government consider to minimise the harm caused by exposure to static betting advertising?*

10. More direct outreach measures to persons who attend venues that display such advertising would assist in minimising the harm caused by exposure to static betting advertising. For example, distributing gambling awareness information to patrons at sporting venues.
11. Lessons maybe learnt from the regulation of tobacco advertising. Perhaps any static betting advertising could be accompanied by warning statements or images.

If you have any questions, please contact Roz Franklin, Senior Social Planner of this office on 5950 1911 or email: [rosalyn.franklin@mornpen.vic.gov.au](mailto:rosalyn.franklin@mornpen.vic.gov.au).

Yours sincerely



Louise Wilkins  
**Manager Child, Youth and Family Care**