

Victorian Inter-Church Gambling Taskforce

Submission to Static Betting Advertising Consultation Paper

19 September 2016

Community Feedback on static betting advertising
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The Victorian Inter-Church Gambling Task Force welcomes this opportunity to make a submission to the Static Betting Advertising Consultation Paper. The Taskforce would prefer to see a ban on all wagering advertising, as people who want to gamble know where to go already to gamble and such advertising only serves to increase the level of harm inflicted on members of the community from gambling.

Should the government consider the development and implementation of the policy proposals to restrict static betting advertising?

The Victorian Inter-Church Gambling Taskforce supports the proposed policy to ban static advertising from locations commonly frequented by minors, where the advertising is unavoidable as part of many Victoria's day-to-day activities and where the advertising location would undermine a responsible gambling objective of the *Gambling Regulation Act 2003*. This should include, but not be limited to, public transport infrastructure (including taxis) and areas proximate to schools. Ideally it should also include billboards located by public roads and sporting grounds, to the extent that the Victoria Government has authority to impose such restrictions. The latter two are further examples of where minors will be unavoidably exposed to static betting advertising and there is a need to curb the wagering businesses attempts to link sport and gambling in the minds of minors, as well as adults.

The harmful impacts of gambling advertising are already noted in section 1.2 of the discussion paper so the Taskforce feels no need to further make the case why banning static betting advertising to the extent possible by the Victoria Government is desirable for the public good.

What factors should the government consider in identifying locations where static betting advertising should be prohibited?

In addition to banning static advertising from locations commonly frequented by minors, where the advertising is unavoidable as part of many Victoria's day-to-day activities and where the advertising location would undermine a responsible gambling objective of the *Gambling Regulation Act 2003*, the Victorian Government should seek to restrict static betting advertising to locations where people would expect to see such advertising. This would include locations where gambling takes place or in a licensed premise or the carpark of a licenced premise. Thus, the Taskforce would urge the Victoria Government to think about where static betting advertising has the potential to do the least harm and restrict the advertising to such locations, rather than restricting such advertising only from locations where it will do the most harm.

However, the Taskforce believes that static betting advertising should be specifically banned from the interior and exterior of sporting clubs where minors will be present, to again try to avoid making the link between sporting activities and gambling in the minds of minors.

Should the government consider prohibiting advertising on other mediums in or on public transport or near schools (e.g. digital advertising, audio-visual advertising)?

For the ban on static betting advertising to reduce harm then the Victorian Government should seek to close of loopholes that would allow wagering businesses to get around the restrictions. This would include needing to prohibit advertising on other mediums in or on public transport or near schools.

What impact (economic, commercial and social) will the policy proposals have on: e) members of the community?

The Taskforce notes there have been a number of surveys showing that members of the community dislike betting advertising in all forms and the role it attempts to play in linking sporting activities with gambling.

Members of the community at risk of harm from gambling will benefit from restrictions on wagering advertising that seeks to encourage them to gamble more than they otherwise would.

Many parents will welcome not having their children exposed to advertising that either intentionally or unintentionally links sporting activities with gambling and increases the risks of minors trying gambling and impacting negatively on their children.

More generally members of the community will welcome the restrictions on advertising as removing an annoyance they cannot avoid in their everyday lives.

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

The Taskforce strongly opposes the government's proposed position that the proposed prohibition would not apply to contracts or agreements that are on foot at the time the prohibition came into effect. This would open an enormous loophole where a wagering business enters into a long term agreement with another body (such as public transport provider) that might last for years now, knowing that the Victorian Government is considering a prohibition on static betting advertising. This would allow the wagering business to continue to advertise for years despite any legislation otherwise banning static betting advertising.

The Taskforce instead believes that instead the Victorian Government should set a reasonable time from when the prohibition passes the Parliament that it enters into force to override existing contracts and agreements, to deter any rush to lock in long term contracts and agreements that will circumvent the prohibition. Six months would seem to be a generous timeframe for existing contracts and agreements.

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