



1 September 2016

Office of Liquor Gaming and Racing
Department of Justice and Regulation
PO Box 18055
Collins Street East
Melbourne VIC 8003
E: LiquorGamingandRacingEnquiries@justice.vic.gov.au

Ask for: Kathleen McClusky
Phone: 9932 1004
Our Ref: A2460075

To the Office of Liquor Gaming and Racing

Response to Static Betting Advertising Consultation Paper

Hobsons Bay City Council welcomes the opportunity to provide a submission in response to the consultation on static betting advertising. We strongly support this review and share the Victorian Government's concern about the impact of this advertising in normalising gambling on sport, particularly on vulnerable groups, but also on the community in general.

In 2015, as a result of Council's concern about the impact of gambling, a Problem Gambling on Electronic Gaming Machines Policy Statement was developed and adopted. While the focus of the policy statement is on poker machines, it also recognises the need for advocacy to address the impacts of online gambling.

Council is an active participant of the Victorian Local Government Working Group on Gambling (LWGOG) and is also a member of the national Alliance for Gambling Reform and recently supported a petition to Prime Minister Turnbull to ban sports betting advertising during G-rated television viewing times. While Council recognises that broadcast advertising of gambling is a federal issue it encourages the Victorian Government to advocate for limits to be introduced.

Thank you for the opportunity to comment and I trust that the attached document provides valuable input.

If you would like to discuss this submission further, please contact Kathleen McClusky, Manager Strategy and Advocacy on 9932 1004 or email kmclusky@hobsonsbay.vic.gov.au.

Yours sincerely,

Chris Eddy
Chief Executive Officer



Hobsons Bay City Council's Submission to Static Betting Advertising Consultation Paper

Hobsons Bay is situated on Port Phillip Bay, approximately seven to 20 kilometres south west of Melbourne's Central Business District (CBD). The current population is estimated at 91,000 people.

Through its Community Health and Wellbeing Plan 2013-17 and Council Plan 2013-17, Hobsons Bay City Council has committed to improving the health and wellbeing of our community; valuing the wellbeing of our people and our place now and into the future. Council's Problem Gambling on EGMs Policy Statement plays a key role in further demonstrating this commitment.

Below are Council's responses to the questions posed in the consultation paper.

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

Council supports the Victorian Government's policy proposal to restrict static sports betting advertising. The rapid growth of sports advertising makes it difficult to avoid or ignore and helps to create an environment that promotes gambling as a recreational activity, without acknowledging the risks.

The rapid growth of sports betting was confirmed by the release of new Australian Gambling Statistics.¹ This revealed that while its share of gambling is still relatively small, betting on sports increased by 30 per cent in 2014-15. It is difficult not to conclude that the saturation level of advertising has been a major contributing factor. Therefore any measures to curb this growth will help limit the damage caused to those who gamble and on those who are affected by it.

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

Council endorses the government's proposal to prohibit advertising in proximity to all primary and secondary schools, preferably within a minimum walking distance of 400 to 800 metres.

While this is a positive preventative measure to help limit the impact of advertising on children, the incidence of gambling among young adult males is growing, as noted in the consultation paper.

¹ The Age, 206, *Punters lose \$23b in a year*, 23 August 2016, page 1-2



It is therefore essential that a ban on sports betting advertising in high traffic, high visibility locations should be considered. Consideration should be given to including a prohibition on areas around tertiary institutions; near transport interchanges and on bus stop shelters; on billboards along busy roads and freeways, and around sporting complexes. This would help minimise exposure to gambling promotion which has become ubiquitous as the community undertakes its daily activities.

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

Council supports the prohibition of betting advertising on all advertising mediums, in addition to static advertising. As stated earlier, locations should extend beyond public transport and schools.

4. *What impact (economic, commercial and social) will the policy proposals have on:*
 - a. *wagering service providers*
 - b. *advertising agencies*
 - c. *public transport operators*
 - d. *sporting bodies*
 - e. *members of the community*

While there is likely to be a financial cost for those who are using static advertising to promote sports gambling and to support their businesses, the counterpoint to this is the profound social and economic costs for vulnerable gamblers, their families and the community if there is no intervention to restrict the current level of advertising. Gambling advertising is usually placed in high traffic areas therefore finding more appropriate replacement advertising should not be a major issue.

It will be important however to be vigilant as wagering service providers seek alternative ways to advertise sports betting and equally important to work with the federal government to limit broadcast advertising, including via social media.

The impact on the members of the community, especially those most vulnerable, from removing this advertising will be welcomed.

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

Council would prefer these new arrangements be introduced immediately but recognises that it may not legally be possible due to commercial agreements with high profile sports such as the AFL, where the finals are approaching together with the



spring racing season where betting plays a key role. It would therefore seem reasonable to introduce the new arrangements as of January 2017 before the AFL season commences.

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

Ultimately, Council would argue for a blanket ban on all forms of static advertising in all locations, given the myriad of broadcasting options that are still available, either through the media or at sporting venues.

As a starting point, a successful outcome of this consultation would be a reduction in the saturation of advertising which is contributing to the normalisation of gambling and the losses. The profile of gambling in the community is a success as evident in the statistics which show that Victorians gambled away almost \$5.8 billion in 2014-15.