



**Gambling Impact  
Society (NSW) Inc.**

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30/7/2010

Dear Mr Hansford,

**RE: Inquiry into the prevalence of Interactive and online gambling in Australia**

We are happy to respond with some comments to the above inquiry. These have listed below in direct relation the stated areas of inquiry. However, as members of the Gambling and Public Health Alliance in International, we refer you also to the attached July Newsletter on Internet Gambling which to which we have contributed. We believe this provides a comprehensive assessment of the issues at stake.

We also attach a recent discussion document which evolved from the Responsible Gambling Awareness Week seminar we hosted in May in Nowra this year. This has been developed in response to community views the issue of gambling and problem gambling and the request for a simple discussion document which could be circulated to support the Productivity Commission's Report 2010. We enclose this for background information and highlighting the concerns of our community.

Yours sincerely

Kate Robert

Chairperson

**GIS (NSW) Comments RE: Inquiry into the prevalence of Interactive and online gambling in Australia**

In undertaking the inquiry, the committee must consider:

- (a) The recent growth in interactive sports betting and the changes in online wagering due to new technologies;

This GIS is concerned that the rapid growth in technology in the gambling industry is moving faster than government regulation can respond and research into harm prevention can be developed. We have already seen this with regards electronic gaming machines and therefore believe that unless new technology can clearly demonstrate it “will do no harm” then there should be no further expansion of gambling and particularly not internet gambling.

Australian technical standards need to change to reflect community standards and consumer protection standards which are that no consumer product should cause harm. It would appear that these standards do not apply to gambling products but as per the recommendations of the 2010 Productivity Commission's report, a consumer protection and public health approach is specifically needed for these products.

- (b) The development of new technologies, including mobile phone and interactive television, that increase the risk and incidence of problem gambling;

The increased risk of problem gambling in technologies which are easily accessible in homes and therefore particularly accessible to youth cannot be supported.

How can they be safeguarded?

Technology can be block for pornography on TV. But how could this effectively be executed for these gambling products?

There are current inconsistencies with regards harm minimisation policy across gambling products. For instance gambling regulation for EGM's in NSW prohibits advertising, but there are no such limits on sports betting.

Currently a TV advertisement for sports betting website based in the Northern Territory can advertise on NSW TV with the website and trade name BET24/7. This name clearly undermines the NSW State harm minimisation goals of promoting a "culture of responsibility" no-one should promoting betting over a 24 hr period.

There are clear anomalies in current regulations and we have little confidence that internet or mobile phone gambling can be appropriately regulated .Therefore we do not support further expansions.

(c) The relative regulatory frameworks of online and non-online gambling;

The GIS does not support online gambling but are aware that if this were to be introduced an effective harm prevention regulatory framework would need to apply across all gambling products and proof of "no harm" should be a necessary part of product licensing.

Anyone planning to gamble on these licensed products should also need to provide proof of age to operate online gambling, no access to credit betting (as per EGM's) and contract needs to be sign as between consenting adults. Time limits and financial limits would also need to be mandatory for all online/mobile phone gamblers (as per smart technology for EGM's)

(d) Inducements to bet on sporting events online;

As per EGM regulations there should be no inducements to gamble. Truth in advertising should mean the real odds are displayed and your chances of winning and likelihood of losing. Alliances with alcohol companies should be banned – alcohol and betting do not mix.

Clear inducement in product marketing such as BET24/7 should be banned

(e) The impact of betting exchanges, including the ability to bet on losing outcomes;

Betting exchanges are a relatively new phenomenon and yet another gambling product with minimal regulation or harm prevention models. Restrictions and codes must apply, legalities of wagering made public and fines and other sanctions (such as withdrawal of licence and/or restricted hours) applied when rule of law is broken.

(f) appropriate regulation, including codes of disclosure, for persons betting on events over which they have some participation or special knowledge, including match fixing of sporting events; and

Restrictions and codes must apply and legalities of wagering made public and fines (and other sanctions) applied when rule of law is broken.

(g) Any other related matters.

How will the government safeguard families, communities and businesses from the inevitable impact of online problem gambling?

Who will bear the cost to the community - As tax payers we have not sanctioned our government's actions to promote online gambling.

Is the government prepared to reform, and increase its mental health reforms so that the increased Problem Gamblers, their wives, husbands and families will be accorded professional medical/mental health treatment due to the impact of online problem gambling - as is given to those who gamble with drug and alcohol?

**Until Australia fully embraces a consumer protection and public health approach to gambling we will continue to allow problem gambling to expand. Please see attached discussion paper.**