

17 September 2023

Kate Houghton
Secretary
Department of Justice and Community Safety Victoria



Via: gamingandliquor@justice.vic.gov.au

Dear Department of Justice and Community Safety,

RE: REVIEW OF VICTORIA'S RESPONSIBLE GAMBLING CODES OF CONDUCT

The Victorian Trades Hall Council (VTHC) welcomes the opportunity to make a submission into this important review to the Minister for Casino, Gaming and Liquor Regulation into the responsible gambling codes of conduct for wagering, betting, book makers, and other forms of gambling that do not include the casino or gaming venues.

Victorian Trades Hall Council (VTHC) was established in 1856 after Victoria became the first place in the world to achieve the 8-hour working day. VTHC represents 41 affiliated unions and over 500,000 members that reach into every industry and community across the state. Victorian unions are deeply invested in ensuring Victorian workers earn liveable wages to provide for themselves and their families.

The gambling industry is demolishing vital improvements won by Victorian workers. It deliberately targets and saturates working and migrant communities with TV, online and social media gambling advertisements, which causes immense harm.

This submission should be read as a response to the Discussion Paper's consultation specifically on betting, and bookmakers, considering questions 19, 21, 22, 23, 25, and 26 related to:

- Customer interactions,
- Marketing, inducements, products and affordability, and
- Advertising.

Victorian unions applaud the Victorian Government on new measures to limit the extent of gambling harm caused by pokies. However, these reforms are at risk of being undone if gambling advertising, and the social media proliferation of gambling is allowed to persist, as working people will move away from gambling at gaming venues and towards the ease and addictive nature of gambling online and via apps.

The most recent study found of the 69% of Victorians who gamble every month, 28.7% bet on races; higher than the number of Victorians that bet on pokies and at casinos; and 8.3% bet on sports.¹ Young people specifically are most likely to gamble on sports, with 21.9% of Victorians aged 18-24 doing so.

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¹ <https://responsiblegambling.vic.gov.au/resources/publications/victorian-population-gambling-and-health-study-20182019-759/>

It is important to note that these statistics are over three years old and do not account for the growth in online gambling that occurred as a result of Covid-19 related lockdowns, and Victorian unions highly suspect that the number of Victorians gambling on sports and races is actually substantially higher. During these lockdowns, the amount Victorians lost to sports and race betting increased from \$1.6 billion, to \$2.3 billion; an increase of nearly 40%. Comparatively, losses to pokies declined from \$2.7 billion in 2018-19 to \$1.5 billion in 2020-21.² However, the losses in Victoria from sports and race betting has continued to grow over recent years. In 2021-22 the losses amounted to over \$2.5 billion, more significant than the losses caused by pokies.³ During 2020-21 approximately one-third of gamblers signed up for an online betting account,⁴ and as a result, it is estimated that gambling increased over the course of lockdowns by as much as 32%.⁵

There is a clear link between gambling advertising and the prevalence of online gambling. For those that are at high risk of gambling harm, 40% reported betting on impulse as a result of gambling advertisements.⁶ A 2015 study found that those at high risk of gambling harm spent, on average, \$6,241 per year on gambling products,⁷ likely to be much higher today.

Gambling advertising also has a clear impact on young people. After being exposed to a gambling advertisement, 1 in 5 young women and 1 in 7 young men aged 18-34 started online gambling for the first time.⁸ Gambling harm such as addiction is a growing issue amongst young people, who are 4 times more likely than adults to be problem gamblers.⁹ During Covid-19 lockdowns, young men aged 18-34 were most likely to take up online gambling increasing their average monthly spending from \$687 to \$1,075.¹⁰

Victorians are being bombarded with this gambling advertising, wherever they turn, making it harder for those at risk of gambling harm to make informed choices. Victorian airwaves broadcast on average 948 gambling ads every day,¹¹ and gambling companies like Sportsbet and Tabcorp spent an estimated \$300 million per year on advertising in the financial year 2021-22, which is amongst the top advertising spends in the country.¹²

Gambling ads are shown during AFL, NRL and cricket games, with parents having no ability to moderate gambling ads being shown to their children. Nearly 4 out of

² <https://responsiblegambling.vic.gov.au/resources/gambling-victoria/expenditure-on-gambling-victoria-and-australia/#:~:text=Pokies%2C%20casino%20and%20lotteries%20gambling&text=Pokies%20losses%20decrease d%20in%202019,%241.679%20billion%20in%202018%E2%80%9319.>

³ <https://responsiblegambling.vic.gov.au/resources/gambling-victoria/expenditure-on-gambling-victoria-and-australia/>

⁴ <https://aifs.gov.au/research/research-snapshots/gambling-australia-during-covid-19>

⁵ <https://aifs.gov.au/research/research-snapshots/gambling-australia-during-covid-19>

⁶ Ibid

⁷ https://aifs.gov.au/sites/default/files/publication-documents/rr-gambling_activity_in_australia_0_0.pdf

⁸ <https://www.9news.com.au/national/gambling-betting-advertising-linked-to-riskier-behaviour-and-vulnerable-people-study-finds/eca2c528-8204-4830-8d40-145fa593a147>

⁹ https://responsiblegambling.vic.gov.au/documents/16/gen-bet-has-gambling-gatecrashed-our-teens_SIPh7sd.pdf

¹⁰ <https://aifs.gov.au/research/research-snapshots/gambling-australia-during-covid-19>

¹¹ <https://www.theguardian.com/media/commentisfree/2023/jun/15/australians-say-they-hate-gambling-ads-from-now-they-will-no-longer-see-them-on-guardian-australia#:~:text=The%20Victorian%20Responsible%20Gambling%20Association,television%20in%20Victoria%20in%202021.>

¹² <https://www.adnews.com.au/news/tabcorp-s-change-in-advertising-strategy-will-hit-tv>

5 Australians reported seeing or hearing gambling advertisements in the last 12 months.¹³ A recent survey of 3,000 AFL fans found gambling ads were their most common concern, with a 75% supporting an outright ban.¹⁴

It is difficult to truly encapsulate the harm gambling causes to Victorian workers. From gambling losses, debt, and money laundering, to associated drug use and mental health harm, to family and domestic violence, and social isolation – the true extent of the harm caused by race and sports betting may never truly be known.

Gambling not only affect those who participate, but also their families, friends and communities. In addition to the estimated 6% of Victorians addicted to gambling, 215,000 children and partners are also being negatively impacted as a consequence.¹⁵ There is a substantial link between gambling and family and domestic violence. Experts theorise that approximately 50% of all FDV cases can be linked to gambling.¹⁶

Victorian unions see the predatory behaviour of the gambling industry in saturating communities with gambling ads, and the unnecessary misery it causes. A recent study of union members across the state found that 89.7% supported an outright ban on gambling advertisements in the same way as smoking ads are banned.¹⁷

A Commonwealth parliament inquiry has recommended that all gambling advertisements be banned, and that they should be phased out over three years.¹⁸ This comes after the number of complaints about gambling ads to Australia's media regulator having doubled.¹⁹

Banning gambling advertisements would minimise many of the social issues associated with gambling and save the Victorian community billions of dollars. The rates of and therefore the cost of social problems caused by gambling will be vastly reduced, and the suffering of thousands of people alleviated. Victoria will be able to invest money back into our communities, where it belongs.

As a leader in the Victorian community, the AFL should acknowledge the obligation it has to minimise gambling related harm and should take real and urgent action on gambling ads. Victorian unions call on the AFL to urgently work with sponsors, broadcasters, and clubs to remove all gambling ads shown during games and around stadiums, to divest from pokies in club owned venues, and to remove live odds and gambling ads from AFL apps and websites.

¹³ <https://www.9news.com.au/national/gambling-betting-advertising-linked-to-riskier-behaviour-and-vulnerable-people-study-finds/eca2c528-8204-4830-8d40-145fa593a147>

¹⁴ <https://www.theguardian.com/australia-news/2023/mar/16/afl-to-stick-with-gambling-ads-despite-more-than-75-of-fans-supporting-bans>

¹⁵ Charles Livingstone, <https://www.theage.com.au/national/victoria/a-voluntary-scheme-was-meant-to-thwart-pokie-pain-we-re-losing-more-than-ever-20230213-p5ck3r.html>

¹⁶ Page 19 <https://aifs.gov.au/sites/default/files/2022-06/RP.17.01-RR-Hing-GamblingDFV.pdf>

¹⁷ Unreleased internal Victorian Trades Hall Council survey of nearly 1000 union members about their attitudes towards pokies and gambling, July 2023

¹⁸ <https://www.theguardian.com/australia-news/2023/jun/28/ads-for-online-gambling-should-be-banned-in-australia-within-three-years-inquiry-recommends>

¹⁹ <https://www.theguardian.com/australia-news/2022/dec/31/complaints-about-gambling-ads-almost-double-australian-media-regulator-says#:~:text=In%202018%2D19%2C%20the%20media,July%20and%20September%20this%20year.>

Online sports and race betting in and of itself is not a bad thing, and Victorian unions support workers' right to use their downtime however they wish. However, the problem lies with a powerful and obscenely wealthy gambling industry, making sure that gambling ads are inescapable on our online spaces, on and television and radio. Workers must be able to relax and enjoy watching their favourite sport or TV show, or use social media without being hounded by gambling advertisements.

Victorian unions make the following recommendations to ban gambling advertisements, inducements, and other marketing, to limit gambling harm and allow workers to make a free, unincumbered choice about gambling.

Recommendation 1: Work with the Federal Government to ban all gambling advertisements online and on TV.

Recommendation 2: Introduce restrictions to substantially reduce the gamification, deals and discounts available for gambling, specifically while online gambling.

Recommendation 3: Introduce restrictions on bonus bets or bet specials offered in app or online designed to keep gamblers gambling.

Recommendation 4: Investigate the use of all state levers such as payroll taxes, liquor licensing, and funding decisions to encourage corporations trading in Victoria to cut ties with gambling companies.

Thank you again for the opportunity to provide a response to this important inquiry. If you have any questions regarding this submission, please contact Tiarne Crowther in my office at tcrowther@vthc.org.au or on (03) 9659 3540.

In solidarity,

A handwritten signature in blue ink, appearing to read 'Luke Hilakari', with a stylized flourish at the end.

Luke Hilakari
Secretary
Victorian Trades Hall Council
LH: TC 91.143