



youth
coalition
of the ACT

Submission

Limiting child and youth exposure to gambling advertising in the ACT – Options for Reform

The Youth Coalition of the ACT acknowledges the Traditional Owners and continuing Custodians of the lands on which we work, and pay our respects to the Elders, families and ancestors.

We acknowledge that the effect of forced removal of First Nations children and young people from their families as well as past racist policies and actions continues today. We acknowledge that First Nations peoples hold distinctive rights as the original people of modern-day Australia including the right to a distinct status and culture, self-determination and land. We celebrate First Nations cultures and the invaluable contribution they make to our community. The Youth Coalition acknowledges the First Nations youth workers, young people and families who have come to Canberra from all across Australia and are making an ongoing contribution to the culture and community of our city. We acknowledge previous generations who have contributed to the history and culture of Canberra.

About the Youth Coalition of the ACT

The Youth Coalition of the ACT is the peak youth affairs body in the Australian Capital Territory. The Youth Coalition's vision is for an ACT community that values and provides opportunity, participation, justice and equity for all young people. The Youth Coalition undertakes policy development, sector development, research and evaluation, advocacy and representation activities to improve outcomes for young people and their families. A key role of the Youth Coalition is the development and analysis of ACT social policy and program decisions that affect young people and youth services. The Youth Coalition facilitates the development of strong linkages and promotes collaboration between the community, government and private sectors to achieve better outcomes for young people in the ACT.

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This submission to the “Limiting child and youth exposure to gambling advertising in the ACT – Options for Reform” outlines the views of the Youth Coalition of the ACT (the Youth Coalition) in relation to restricting gambling advertising the ACT.

The Youth Coalition strongly supports a total ban across all platforms, including online, television (both free-to-air and paid), and radio of gambling advertising.

However, we understand the limitations the ACT Government has in restricting advertising as a lot of it falls within the scope of the Federal Government. For this reason, **we back Option 2 set out within the discussion paper, with several recommended enhancements.** Additionally, we would urge the government to view this as a first step and explore further opportunities to tighten restrictions to safeguard our children and young people. **There is no level of safe exposure to gambling advertising for young people.**

We have a responsibility to ensure that children are safe and that we are not exposing them to harmful products. Gambling is an addictive and harmful product, and we must limit young people's exposure to it. A longitudinal study also found that amongst 16 to 17 year old Australians, 2.8% classified as having problem gambling behaviours, and 9.3% at risk of problem gambling (Pitt et al., 2022). Gambling in Australia is embedded into our culture, normalised and widely accepted and young people are aware of the ‘normalisation of gambling’ (Pitt et al., 2022). The saturation of gambling advertisements only worsens the problem, exposing children to the idea that gambling is a normal part of life. This is particularly concerning as young people's brains are still in crucial phases of development, particularly in areas related to decision-making, impulse control, and risk assessment. Early exposure to this advertising primes them, increasing the likelihood of gambling-related harm as they age.

This will benefit the whole community

Restricting gambling advertising shouldn't be viewed as only benefiting young people. Research has demonstrated that gambling advertisements increase gambling intensity, frequency, and risky gambling behaviours amongst adults (Balem et al., 2022). A recent study also highlighted the strong correlation between gambling and increases in crime. For every 10% increase in gambling expenditure, there is an almost equivalent rise in assaults, break-ins, motor vehicle thefts and fraud (Does Gambling Expenditure Have Any Effect on Crime? - Wan - Addiction - Wiley Online Library, n.d.). Additionally, gambling has been identified as a significant contributor to suicide (Marionneau & Nikkinen, 2022), and it causes a wide range of harms, including relationship, health, emotional/psychological, financial, and work/study harms. The amplification of these issues through gambling advertising means our whole community suffers and results in substantial social costs.

The community wants it restricted

Many Australians share our concern. The Australian Institute of Family Studies' Australian Gambling Research Centre (AGRC) recently found that 69% of Australians believe there are too many betting advertisements (Australian Gambling Research Centre, 2023). The AGRC also reported that most Australians believe gambling advertising encourages people to bet for the first time, bet more than usual, and engage in riskier betting behaviours. Moreover, the "Inquiry into online gambling and its impacts on those experiencing gambling harm" recommended a phased, comprehensive ban on online gambling advertising is within three years.

Limitations of Local Action and the Need for a National Approach

We acknowledge the challenges the ACT Government faces in implementing a total ban, given that advertising is broadly regulated at the national level. However, we believe that the ACT should push for greater restrictions and actively advocate for this at a national level. The community does not want gambling advertising, and we must act on this significant public health issue. In relation to this submission however, **we support option 2 outlined below:**

Option 2

Restrict gambling advertising in the ACT from being placed on radio between 6:00am and 8:30am Monday to Friday (inclusive), on TV between 4.00pm to 8.30pm (or later), Monday to Friday (inclusive), and on TV between 6:00am and 8:30pm, Saturday and Sunday, except on a dedicated sports channel.

We would suggest the following enhancements to this option:

- Gambling advertising should be restricted to at least 11:30pm at night both during the week and on weekends. This would align with peak exposure times of young people set out within the discussion paper.
- 0-11 year olds have the greatest level of exposure to gambling ads as outlined in the discussion paper. One of their peak viewing times is in the morning. Gambling advertising should therefore be restricted from 6am to 10:30am during the day.
- Gambling advertising on radio should be restricted on weekends 6:00am and 11:30pm.

Other areas to consider

In the absence of a national ban on gambling advertising, we strongly recommend that the ACT Government explore additional ways to protect young people and the broader community.

Online Advertising

The impact of digital gambling advertising is often concealed, and vulnerable demographics, including teenagers, are frequently targeted. While this inquiry does not focus on online platforms, we recommend the government consider options to restrict gambling advertisements in the digital space. The ACT Gambling and Racing Control (Code of Practice) Regulation 2002 prohibits targeting individuals under 18 with advertisements. However, we know that teenagers are regularly exposed to gambling ads, particularly on platforms like TikTok and YouTube. We urge the ACT Government to collaborate with national regulators to enforce

stronger controls on gambling advertisements across these platforms. We would also encourage the ACT Government to explore the use of tools such as Scanner developed by Deakin Universities Global Centre for Preventive Health and Nutrition used to monitor harmful product marketing online.

Broadening the Definition of Children's Programs

Currently, gambling advertisements are restricted during children's programs, defined as content classified under G, C, and P categories. These restrictions apply only between 6 a.m. and 8:30 a.m. and 4 p.m. to 7 p.m. Given that young people often consume content outside of these narrow classifications and time slots, we strongly encourage the government to explore more comprehensive regulations to ensure young people are better protected from gambling advertisements.

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