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Wagering Advertising Research

Socio-economic benefits of a ban on wagering advertising in Australia

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Australian Gambling Research Centre, Australia Institute of Family Studies

Final Report

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FOI 27-145- Document 1

Contents

Acknowledgements 2

List of tables 5

Key terms 7

Glossary 8

Executive summary 10
- Background 10
- Purpose of this research 10
- Methodology 11
- Findings 13
- Conclusions 13
- Limitations 13
- Future directions 14

Background 15
- The current wagering advertising climate 15
- The impact of wagering advertising 17
- The cost of gambling harm 18
  - Financial 18
  - Psychological 19
  - Relationships 19
  - Health 20
  - Work 20
- *You win some, you lose more*: recommendations from the parliamentary inquiry report into online gambling harm 20
- The growing evidence base on banning wagering advertising and an international example 21
- This report 22

Methodology 22
- Data sources 23
  - Prevalence of wagering in Australia 23
  - Prevalence of wagering harm 24
  - Estimation of cost items 27
  - The data used to estimate the impact of wagering advertising on days wagering 29
- Data analysis 29
  - Approach to cost calculations 29
  - Calculating the effectiveness of a wagering advertising ban 32

Results 35
- Total cost of wagering in Australia, by cost category and PGSI 35
- Total cost of wagering in Australia, by bearer of cost and PGSI 36
- Cost of wagering in Australia, by cost category and PGSI 37
  - Direct wagering expenditure 37
  - Financial harms 38
  - Psychological harms 39

Released under the FOI Act 1982 by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

FOI 27-145- Document 1

Relationship harms 41
Health harms 43
Work harms 44
The benefit of a wagering advertising ban in Australia 46

Discussion 48
Limitations 50
Future directions 50

References 52

Appendices 56
Appendix A: Problem Gambling Severity Index (PGSI) instrument 56
Appendix B: Socio-economic benefit calculation depression example 57
Appendix C: Survey questionnaires (selected items) 58
Community Attitudes Study (CAS) data – Selected items 58
The Household, Income and Labour Dynamics in Australia (HILDA) – Selected items 60
National Gambling Trends Study data – Selected items 62
Appendix D: Alternative scenario estimates for wagering advertising bans 68

Released under the FOI Act 1982 by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

FOI 27-145- Document 1

List of tables

Table 1: Cost framework for wagering in Australia, 2023 23

Table 2: Prevalence of gambling and wagering in Australia, by problem gambling severity, 2023 24

Table 3: Prevalence of wagering in Australia, by frequency, 2023 24

Table 4: Prevalence of bankruptcy, depression and separation in Australia, by problem gambling severity, 2023 (HILDA W22 data) 25

Table 5: Prevalence estimates (*n*, %) for harm items by PGSI for regular wagerers, 2023 26

Table 6: Harm cost items and sources, 2023 27

Table 7: Regression dominance analysis estimated of the relative contribution of other psychological harm to disability weights (NGTS 2023 data) 32

Table 8: Total cost of wagering in Australia, by PGSI category, 2023 35

Table 9: Estimated total cost of wagering in Australia, by bearer of cost and PGSI category, 2023 36

Table 10: Direct yearly wagering expenditure by PGSI category, 2023 37

Table 11: Calculation and cost of excessive wagering expenditure by PGSI score, 2023 38

Table 12: Cost of bankruptcy due to wagering by PGSI category, 2023 39

Table 13: Cost of depression due to wagering by PGSI category, 2023 40

Table 14: Cost of anxiety due to regular wagering by PGSI category, 2023 40

Table 15: Cost of other psychological harm due to regular wagering by PGSI category, 2023 . 41

Table 16: Cost of separation due to wagering by PGSI category, 2023 41

Table 17: Cost of emotional distress to affected others due to regular wagering by PGSI category, 2023 42

Table 18: Cost of mild alcohol dependence around regular wagering by PGSI category, 2023 43

Table 19: Financial cost of alcohol expenditure around regular wagering by PGSI category, 2023 43

Table 20: Cost of illicit drug use around regular wagering by PGSI category, 2023 44

Table 21: Cost of absenteeism due to regular wagering by PGSI category, 2023 45

Table 22: Cost of reduced work performance due to regular wagering by PGSI category, 2023 45

Table 23: Total benefits of a ban on wagering advertising in Australia, by PGSI category, 2023 47

Table 24: Total benefits of a ban on wagering advertising in Australia, by bearer of the cost within PGSI category, 2023 48

Released under the FOI Act 1982 by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

FOI 27-145- Document 1

Table 25: Alternative scenario A total benefits of a ban on wagering advertising in Australia, by PGSI category, 2023 68

Table 26: Alternative scenario B total benefits of a ban on wagering advertising in Australia, by PGSI category, 2023 69

Released under the FOI Act 1982 by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

FOI 27-145- Document 1

Key terms

Acronym	Description
ABS	Australian Bureau of Statistics
ACMA	Australian Communications and Media Authority
AGRC	Australian Gambling Research Centre
AIFS	Australian Institute of Family Studies
AANA	Australian Association of National Advertisers
AUDIT-C	Alcohol Use Disorders Identification Test
BoD	Burden of Disease
CAS	Community Attitudes Study
CPI	Consumer Price Index
DITRDCA	Department of Infrastructure, Transport, Regional Development, Communications and the Arts
DSM	Diagnostic and Statistical Manual of Mental Disorders
DSS	Department of Social Services
DW	Disability Weight
EMA	Ecological Momentary Assessment
GBD	Global Burden of Disease
GRA	Gambling Research Australia
HILDA	The Household, Income and Labour Dynamics in Australia
IPV	Intimate Partner Violence
NGTS	National Gambling Trends Study
PC	Productivity Commission
PGSI	Problem Gambling Severity Index
SF-36	36-Item Short Form Survey
SGHS	Short Gambling Harms Screen
SPLA	Social Policy and Legal Affairs
TV	Television
VCEC	Victorian Competition and Efficiency Commission
VLY	Statistical Value of Life in a Year
WSP	Wagering Service Provider

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FOI 27-145- Document 1

Glossary

Term	Description
Advertising	'A paid, mediated form of communication from an identifiable source, designed to persuade the receiver to take some action, either now or in the future' (Richards & Curran, 2002, p 74)
Affected others	Affected others relates to individuals who experience gambling-related harm as a result of another person who gambles. An affected other could be, but is not limited to, a partner, family member, friend, colleague or an individual who themselves gambles.
DSM	The *Diagnostic and Statistical Manual of Mental Disorders* (DSM) is a reference handbook that outlines, describes and helps define mental and brain related conditions. It is published by the American Psychiatric Association (APA) and is the primary system used in Australia to identify mental health conditions. The DSM-V (most recent version) includes gambling disorder as a substance-related and addictive disorder.
Gambling	Gambling requires a player to risk losing something of value (usually money) for the chance of winning more. Gambling outcomes may depend on correctly predicting an uncertain outcome (such as a particular horse coming first in a race) or luck (such as a winning combination of symbols on a poker machine).
Gambling-related harm	Adverse consequences that occur as a result of someone's gambling. Gambling-related harm can be divided into key areas: financial harm, relationship disruption, emotional or psychological distress, decrements to health, cultural harm, reduced work or study performance and criminal activity. These harms can further be considered as general harms, which occur at any time, crisis harms, which are associated with attempts to seek help, and legacy harms, which occur long after gambling has ceased. Gambling-related harm can be experienced by the gambler and others close to them (affected others).
High-risk gambling	Terminology applied to 'problem gambling', as measured by the PGSI. The use of the term 'high-risk' is less stigmatising than the use of 'problem' and focuses on a public health approach, moving away from a clinical definition.
Inducement	Gambling inducements are marketing offers that intend to attract new gambling customers or encourage existing customers to continue gambling (Hing et al., 2018). This could include, but are not limited to, methods such as bonus and multi-bets, rewards programs or direct messaging to consumers (Hing et al., 2018).
Low-risk gambling	Low-risk gambling is characterised by the experience of a low level of harm with few or no identified negative consequences. Low-risk gamblers have scores of one or two on the PGSI.
Marketing	'Marketing is the activity, set of institutions, and processes for creating, communicating, delivering, and exchanging offerings that have value for customers, clients, partners, and society at large' (American Marketing Association, 2017). Advertisements and inducements are considered to be components of marketing (Hing et al., 2018).

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FOI 27-145- Document 1

Term	Description
Moderate-risk gambling	Moderate-risk gambling is characterised by the experience of a moderate level of harm from gambling, with some negative consequences, such as spending more than you can afford, losing track of time or feeling guilty about your gambling. Moderate-risk gamblers have scores of 3 to 7 on the PGSI.
Non-problem gambling	Non-problem gambling is characterised by the experience of no negative consequences from gambling. Non-problem gamblers have a score of zero. Also labelled 'non-risk gambling'.
Non-risk gambling	Terminology applied to 'non-problem gambling', as measured by the PGSI. The use of the term 'non-risk' is less stigmatising than the use of 'non-problem' and focuses on a public health approach, moving away from a clinical definition.
Problem gambling	Problem gambling is characterised by difficulties in limiting money and/or time on gambling, which leads to adverse consequences for the person gambling and often others in the community. Problem gamblers have scores of 8 or more on the PGSI. In this report problem gambling has been labelled as 'high-risk gambling'. 'Problem gambling' is also language used for the DSM-V criteria for a gambling disorder and which entails clinical treatment or interventions targeting an individual's gambling behaviour. This may also be called a 'gambling problem'.
Problem Gambling Severity Index (PGSI)	The PGSI is a Canadian screening tool for use in community settings (Ferris & Wynne, 2001). It has been adapted for use in Australia and is commonly used in Australian studies to assess problem gambling prevalence and as a self-assessment tool.
Promotions	Gambling promotions are defined as offers that are not routine and are generally short term and that provide additional gambling incentives to consumers (Hing et al., 2018).
Race betting	Wagering on the outcome of horse and greyhound races, excluding all sweeps.
Sports betting	Wagering on local, national or international sporting activities (other than horse and greyhound racing).
Wagering	The term used to refer officially to bets placed on racing and sporting events. It is used as a term for a distinct form of gambling.
Wagering advertising	Any material that is published or broadcast using any medium related to a wagering product or service provided by a licensed operator that offers betting on horse races, harness races, greyhound races, sporting events, novelty events, fantasy sport teams, odds compilation, tipping services and or other contingencies (Australian Association of National Advertisers [AANA], 2024).

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FOI 27-145- Document 1

Executive summary

This document outlines the findings of the socio-economic benefits of a partial ban on wagering advertising in Australia for 2023. The research was conducted by the Australian Gambling Research Centre (AGRC) and commissioned by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA or 'the Department').

Background

Wagering refers to gambling money on racing and sporting events of which the outcome is uncertain (Australasian Gaming Council, 2021). Although wagering is a common form of entertainment for Australians, as with other gambling activities, it can have severe and lasting socio-economic impacts on individuals and their families.

Wagering advertising in Australia is commonplace, with research finding high levels of exposure to wagering advertising found among children and adults, especially in the context of sports (AGRC, 2023b; Pitt et al., 2016; Sproston et al., 2015). This exposure to wagering advertising acts to normalise gambling and is associated with high levels of wagering and gambling-related harm (Hing et al., 2018).

These negative impacts are at the core of ongoing debate and policy consideration surrounding the role that wagering advertising has in increasing gambling-related harms associated with wagering to wagerers, affected others and the broader community. Given the evidence, it is reasonable to assume that reducing wagering advertising will lead to a reduction in wagering spending and harm, which may generate a socio-economic benefit for Australia.

In 2023 the House of Representatives Standing Committee on Social Policy and Legal Affairs (SPLA or 'the Committee') conducted the *You Win Some, You Lose More* parliamentary inquiry on online gambling harm. The inquiry recommended that the Australian Government, with the cooperation of the states and territories, implement a comprehensive ban on all forms of advertising for online gambling, excluding lotteries (SPLA, 2023). Since lotteries and wagering are the forms of online gambling that are legal for operators to provide to Australians, the recommendations for a 'gambling' advertising ban only applied to wagering advertising.

The recommended wagering advertising ban would be introduced in 4 phases over 3 years. By the end of year 3, there would be a prohibition on all online wagering advertising and sponsorship.

Purpose of this research

The Department engaged the AGRC to analyse available data to estimate the potential socio-economic benefit of a partial ban on wagering advertising in Australia for 2023, which included benefits to wagerers, affected others, the community and government.

The scope of this proposed partial ban on wagering advertising by DITRDCA is broadly in line with elements of the Committee's recommendations under Phases 1 and 2, and specifically included:

- banning wagering advertising during live sports and 60 minutes on either side of the sports broadcast on television and radio
- banning wagering advertising during children's television programming

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FOI 27-145- Document 1

- limiting the frequency of wagering advertising on television and radio to no more than 2 advertisements per channel, per hour (between 6 am and 10 pm)
- banning wagering advertising on online platforms at all times, including social media, websites and apps.

Exclusions applied to wagering advertising on dedicated racing channels.

Based on the above, the parameters provided by DITRDCA for estimating the socio-economic benefits on wagering advertising were:

- complete ban (100% reduction) on online advertisements, including social media
- 28% reduction in TV advertisements, including streaming
- 25% reduction in radio advertisements
- 80% reduction in advertisements through betting affiliates.

Alternative scenario benefit estimates requested by DITRDCA were provided for (a) a greater reduction of 49% in TV and streaming wagering advertising, and (b) a complete ban on the majority of wagering advertising (excluding direct messages).

Methodology

The total cost of wagering in Australia was estimated first, to derive the benefit of this partial wagering advertising ban.[1]

It is important to note that in this report the costs of wagering mean **the costs of wagering loss** and **monetised value of wagering harms**. The term does **not** mean the costs of providing wagering services.

Outlined below are the steps that were taken to estimate the socio-economic costs of wagering in Australia (steps 1 to 2) and the benefits (cost savings) due to the proposed wagering advertising ban (steps 3 to 5).

Estimate the socio-economic costs of wagering in Australia		**Estimate the benefits/cost savings**		
1. Estimate how many wagerers are categorised in non-risk, low-risk, moderate-risk and high-risk gambling in Australia (4PGSI categories).	2. Estimate the total cost of wagering in Australia.	3. Estimate how many days wagering per year the proposed wagering advertising ban can reduce in each PGSI category.	4. Estimate how much the reduction in days wagering per year in each PGSI category generates in costs saving.	5. Calculate net cost savings (benefit) from all four PGSI categories.

[1] The socio-economic costs of wagering in Australia were costed following similar gambling costing frameworks (e.g. Browne et al., 2017; Productivity Commission, 1999; Victorian Competition and Efficiency Commission, 2012).

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Costs were estimated for 12 wagering items in 6 domains:

1. Direct wagering expenditure (loss)
2. Financial (bankruptcy – administration cost, unpaid debts)
3. Psychological (depression, anxiety, other psychological harm)
4. Relationships (financial cost of separation, emotional cost to affected others)
5. Health (mild alcohol dependence, expenditure on alcohol around wagering, drug use disorder)
6. Work (absenteeism, reduced work performance).

Costs borne by wagerers themselves were direct wagering expenditure (loss), as well as health and psychological harms. Costs borne by affected others (i.e. family, friends, others close to the wagerer) were represented by the unpaid debts of bankruptcy and relationship harms resulting in emotional distress.

Governments are responsible for administrating bankruptcies and some financial costs associated with separation. The costs to community were associated with unpaid debt (i.e. to businesses), financial cost of separation, and the cost of work absenteeism and reduced performance by wagerers to their employers.

The costs associated with wagering harm were disaggregated in to 4 at-risk gambling categories as measured by the Problem Gambling Severity Index (PGSI; Ferris & Wynne, 2001): non-risk, low-risk, moderate-risk and high-risk (problem) gambling.

The following methodological approaches were applied to sourcing data and data analysis.

- The main sources of data used to estimate the cost of wagering in Australia were:
  - Australian adult population prevalence of wagering (in the last 12 months) overall and by Problem Gambling Severity Index (PGSI) status: Household, Income and Labour Dynamics in Australia (HILDA) Survey: Wave 22 (2022) adjusted to the Australian Bureau of Statistics (ABS) 2023 population (1,680,985 adult wagerers)
  - Australian adult population prevalence of regular wagering (at least monthly in last 12 months) overall and by PGSI status: National Gambling Trends Study (NGTS) 2023 dataset of regular (at least monthly) wagerers adjusted to the 2023 population (467,980 adult regular wagerers)
  - prevalence of costed harm items due to last 12-month wagering (HILDA Wave 22) and regular wagering (NGTS 2023) by PGSI status
  - total wagering expenditure (loss) for 2023, sourced from the H2 Gambling Capital dataset, and proportions of spend per PGSI category, based on HILDA W22 data.
- Costs apply to the 2023 year. Where prices from previous years were only available, CPI was used to adjust costs to June 2023 (ABS, 2024).
- Appropriate counterfactual and double counting adjustments were made in the estimations.
- The basic approach to costing each item was: prevalence of item to wagering population (A) x 80% counterfactual adjustment (B) x cost of item per person (C) x disability weight (D – psychological and health items only)
- The benefit of a partial ban (reduction) in wagering advertising in Australia was calculated using the Community Attitudes Study (CAS, 2022) data by estimating the impact of the number of days exposed to wagering advertising per year on the number of days wagering per year. The number of days exposed to wagering advertising was then reduced by the proposed partial wagering advertising ban in order to estimate how the reduction would change PGSI categorisation in the wagerer and regular wagerer population.

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Findings

The estimated total cost of wagering in Australia for 2023 was $26.7 billion. Under the proposed partial wagering advertising ban it was estimated that wagering would be reduced annually by an average of 5 days (8.7%) per person. When applied to the total cost, the partial ban on wagering advertisement proposed by DITRDCA would generate an estimated annual $117.6 million of socio-economic benefits.

Overall, one-third of the benefit of this proposed wagering advertising ban was the emotional cost due to relationship harm to affected others (33.2%), followed by direct wagering expenditure (loss) to wagerers (32.4%), the cost of depression to wagerers (12.2%), and the cost of mild alcohol dependence to wagerers (8.1%).

Alternative scenario benefit estimates provided by a greater reduction of 49% in TV and streaming wagering advertising resulted in an increased benefit of $182.2 million. A complete ban on the majority of wagering advertising (excluding direct messages) had an estimated benefit of $332.1 million.

Conclusions

This report provides evidence that the proposed reduction in wagering advertising by DITRDCA could mitigate some harmful effects associated with wagering and generate a socio-economic benefit in Australia. Furthermore, this report provides evidence that further reductions in wagering advertising generate larger decreases in wagering, wagering spend and harm, and an increase in socio-economic benefits.

The findings suggest this proposed reduction in wagering could inform part of a phased approach by the Australian Government, in collaboration with the states and territories, which eventually may lead to a ban on all wagering advertising in Australia. The extent to which the proposed reduction in wagering advertising is sufficient to mitigate harmful effects should be subject to monitoring and evaluation, including (based on international experience) monitoring of the wagering industry's strategies to navigate the ban (e.g. increase in direct messaging) to inform need for further adjustments of the phased approach.

Limitations

The estimates in this report are likely to be an underestimate of socio-economic benefits due to limitations in available data and methodology. These limitations include:

- The data sources used for this analysis (HILDA, NGTS, CAS and H2 Gambling Capital data) all have different populations and sampling methods, which introduces a lack of consistency.
- The prevalence of gambling and gambling harms in the HILDA data may be an underestimate compared to other prevalence studies – for example, the prevalence of wagering in HILDA is 8%, whereas a 2019 national gambling prevalence study with a sample of 15,000 Australian adults representative of the population found the prevalence of race betting to be 16.8% and sports betting 9.6% (Hing et al., 2021).
- Given estimates of the cost of wagering and the socio-economic benefits from a wagering advertising ban were estimated to the prevalence figures from HILDA, both are likely underestimates.
- Due to limitations of the data, several socio-economic costs related to harm associated with wagering (and therefore benefits due to a wagering advertising ban) were unable to be

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FOI 27-145- Document 1

estimated. These include crime (legal costs, cost to business), costs of job loss and job change, productivity loss for study (unable to complete a degree for example), emotional costs after separation, suicide (ideation, attempt, completion), debt prior to bankruptcy, loss of assets, physical health (e.g. loss of sleep), tobacco use, IPV and domestic violence, the cost to the health system, and the cost to governments at all levels (e.g. justice system).

- Due to data limitations, costs and benefits associated with those who started or stopped wagering due to the ban were not estimated.
- This study only estimated the short-term impacts of a partial wagering advertising ban.
- The proposed plan ruled out restricting wagering advertising through direct messaging, which the researchers found was a significant and strong predictor in wagering participation.

Future directions

Based on the findings, this report recommends:

- The government should consider a total ban on wagering advertising in Australia.
- Future work could simulate a scenario where direct messaging is also including in the wagering advertising ban as banning wagering advertising through direct messages would be more likely to significantly reduce harm associated with wagering.
- DITRDCA and/or the Department of Social Services commission an Australian gambling prevalence study, in order to gain accurate prevalence estimates of wagering; the impact of exposure to wagering advertising; and a wider range of harms associated with wagering.
- The Department of Social Services facilitates access to and linkage of Wagering Service Provider (WSP) data to administrative data so that estimates can be calculated for costs to the health system, employment, government and suicide (via death records).
- DITRDCA commissions a long-term evaluation of the impact of a wagering advertising ban.

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FOI 27-145- Document 1

Background

The current wagering advertising climate

Wagering refers to gambling money on racing and sporting events of which the outcome is uncertain (Australasian Gaming Council, 2021). Although wagering is a common form of entertainment for Australians – as with other gambling activities, it can have severe and lasting socio-economic impacts on individuals and their families.

Wagering advertising in Australia is commonplace, with research finding high levels of exposure to wagering advertising found among children and adults, especially in the context of sports (AGRC, 2023b; Sproston et al., 2015; Pitt et al., 2016). This exposure to wagering advertising acts to normalise gambling and is associated with high levels of wagering and gambling-related harm (Hing et al., 2018).

These negative impacts are at the core of ongoing debate and policy consideration surrounding the role that wagering advertising has in increasing gambling-related harm associated with wagering to wagerers, affected others and the broader community. Given the evidence, it is reasonable to assume that reduced wagering advertising will lead to a reduction in wagering spending and harm, which may generate a socio-economic benefit for Australia.

Measuring gambling-related harm

Gambling-related harm is commonly assessed via the Problem Gambling Severity Index (PGSI). The PGSI provides a measure of at-risk gambling behaviour during the previous 12-month period.

It consists of 9 items (questions), such as ‘have you bet more than you could really afford to lose?’, with response options being never (0), sometimes (1), most of the time (2) and almost always (3).

Scores are summed for a total between 0 and 27.

Respondents are grouped into 4 categories based on their scores:

- non-risk (‘non-problem’) gambling (0)
- low-risk gambling (1–2)
- moderate-risk gambling (3–7)
- high-risk (‘problem’) gambling (8–27).

Respondents scoring 1+ may be classified as being at some risk of, or already experiencing, gambling-related harm.

Source: Ferris & Wynne, 2001. See Appendix A for the full PGSI instrument.

The Australian Association of National Advertisers (AANA, 2024) considers wagering advertising to be any material that is published or broadcast, using any medium, related to a wagering product or service provided by a licensed operator that offers betting on horse races, harness races, greyhound races, sporting events, novelty events, fantasy sport teams, odds compilation, tipping services and/or other contingencies.

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The number of wagering advertisements shown per year is not currently publicly available; however, between 1 May 2022 and 30 April 2023, the Australian Communications and Media Authority (ACMA) found that over 502,800 gambling advertisements aired on free-to-air TV and metro radio from gambling providers offering online gambling services (ACMA, 2023), which are primarily wagering products.

Gambling marketing is broader than television and radio, and includes pop-ups on websites, inducements, celebrity brand ambassadors, direct and third-party email and messages, loyalty programs, sponsorship and promotions. ACMA's analysis of Nielsen Ad Intel data revealed that $238.6 million was spent on gambling advertising on free-to-air TV, metro radio and online between May 2022 and April 2023. This figure was estimated to be $89.7 million in 2011 by the Victorian Responsible Gambling Foundation (Hetherington & Phillips, 2023), which represents a 266% increase.

Recent research by the Australian Gambling Research Centre (AGRC) highlighted the extent to which Australians are exposed to wagering advertising and the negative community attitudes towards wagering advertising (AGRC, 2023a; 2023b). In a representative sample of 1,765 Australian adults, this study found that three-quarters (78%) reported seeing or hearing wagering advertising at least once a week in the past 12 months, while 2 in 5 (41%) were exposed 4 or more times a week (AGRC, 2023b).

The most frequent exposure to wagering advertising was through TV, with 66% of the sample seeing or hearing wagering advertisements on TV once a week or more, and 32% four or more times a week (AGRC, 2023b). When asked about their attitudes towards wagering advertising, 69% of the sample of Australians reported that wagering advertisements were too common (AGRC, 2023a). The majority of respondents in this survey stated that wagering advertising 'makes sport less family-friendly', normalises gambling among children, and targets people at risk of experiencing gambling problems.

Most respondents believed that wagering advertising 'encourages people to bet for the first time', 'bet more than usual' and 'engage in riskier betting'. In the sample, Australians were more likely to support than oppose outright bans on all forms of wagering advertising (AGRC, 2023a).

Australian parents have reported being bothered by gambling advertising and were particularly concerned about their children's exposure to it (ACMA, 2019). In a submission to the *You Win Some, You Lose More* parliamentary inquiry on online gambling harm (House of Representatives Standing Committee on Social Policy and Legal Affairs [SPLA], 2023), both the ACMA and the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) reported an increase in the number of complaints they received about gambling advertising. Taken together, public sentiment appears to be in support of a reduction in wagering advertisements.

The parliamentary inquiry into online gambling harm recommended that the Australian Government, with the cooperation of the states and territories, implement a comprehensive ban on all forms of advertising for online gambling, excluding lotteries (SPLA, 2023). Given that lotteries and wagering are the only forms of online gambling that are legal for operators to provide to Australians, the assumption is that the SPLA recommendations are solely directed at wagering advertising.

The recommended ban would be introduced in 4 phases over 3 years. By the end of year 3, there would be a prohibition on all online wagering advertising and sponsorship. However, such a ban should be backed by literature around the effects of wagering advertising, the extent of gambling harm and evidence that a reduction in wagering advertising will lead to a reduction in

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gambling harm. The literature review below provides an overview of the literature related to the effects of wagering advertising and the extent of gambling harm.

The impact of wagering advertising

Wagering advertising reaches a range of different groups. Different age cohorts are typically exposed to different types of advertising mediums (AGRC, 2023b). People aged between 18 and 34 years are more likely to be exposed to wagering advertising online and through social media. Whereas people aged 55 and above are more likely to be exposed to wagering advertising through traditional media such as television, radio and print.

Qualitative research analysing the content of sports betting advertisements (Deans et al., 2016) and the views of men who bet on sports (Westberg et al., 2017) highlighted how wagering advertisements can lead to misconceptions about the normalcy of gambling and how much gambling engagement and expenditure is reasonable. This is because advertising can create misperceptions about the extent to which Australians gamble.

Vulnerable groups such as migrants can be targeted by gambling advertisements (Wardle et al., 2019). Therefore, some migrants, particularly those that have no gambling background, may believe they need to gamble to fit in to Australian culture.

Children's exposure to wagering advertising may be higher than it is for adults. A 2015 study found that adolescents were more likely to be exposed to wagering advertising on TV than adults, including adults engaged in regular sports betting (Sproston et al., 2015). This exposure normalises gambling for young people, including children, across Australia. Three-quarters of a sample of children who participated in AFL, NFL and soccer in New South Wales (NSW) and Victoria thought that betting was a normal part of sport (Pitt et al., 2016).

Youth exposed to wagering advertising are likely to experience long-term consequences. For example, men aged 18 to 24 are the largest group of sports bettors in Victoria (Rockloff et al., 2020). In one study, it was found that nearly a third (31%) of Victorian secondary students had gambled, of which 38% had bet on sports (Freund et al., 2019). Similarly, national research undertaken by the Australian Institute of Family Studies (AIFS) shows that 6% of people aged 16 and 17 had bet on sport in the past 12 months (Warren & Yu, 2018).

Regular bettors on sports and racing are exposed to wagering advertisements almost daily (Hing et al., 2019). The most common types of advertisements include direct messages (emails, texts or phone calls from betting operators) and advertising on betting websites or apps. Gamblers at moderate risk and high risk of harm (as measured by the Problem Gambling Severity Index, PGSI: Ferris & Wynne, 2001) were significantly more likely to report having been exposed to social media gambling promotions because they actively engaged with gambling operators on these platforms (Gainsbury et al., 2016).

Over one-third of these moderate-risk and high-risk gamblers indicated that the promotions had worsened their gambling problems. A Swedish study found gamblers who set limits to their gambling reported a negative influence from advertising more often than those who did not set limits (Binde & Romild, 2019). This relationship was explained as possibly arising from perceptions that gambling advertising hinders efforts to reduce excessive gambling (Binde & Romild, 2019).

Social media and direct messages (emails, text messages, phone calls) enable gambling operators to target individual gamblers with personalised marketing (Syvertsen et al., 2022). Although this study found that online advertising was the strongest predictor of perceived advertising impact on gambling involvement, TV advertising had the most impact on increasing

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FOI 27-145- Document 1

awareness and knowledge of gambling forms and operators (Syvertsen et al., 2022). Nonetheless, wagering advertisements and inducements, by interacting with situational, structural and individual factors influence betting behaviours and negatively impact all gamblers (Hing et al., 2018).

Greater exposure to gambling advertising is associated with more positive attitudes towards gambling, greater intentions to gamble and increased gambling activity (McGrane et al., 2023). An ecological momentary assessment (EMA) with regular wagerers found an increase in bet size and frequency on days bettors were exposed to wagering advertising, with consistent effects across various levels of at-risk gambling (Hing et al., 2019).

The same study found bettors with a moderate risk of harmful gambling bet when not planning to do so and exceeded their intended spending, especially if exposed to direct messaging (Browne et al., 2019).

A meta-analytic review found that increased exposure to gambling advertising was associated with more favourable attitudes toward gambling, likely due to a dose-response relationship, where greater exposure to gambling advertising was associated with more significant positive effects on gambling attitudes and behaviour (Bouguettaya et al., 2020).

Another study found that the strongest predictors of frequency of sports betting were higher problem gambling severity, previous sports betting participation as well as more frequent exposure to and positive attitudes towards promotions (Hing et al., 2015).

The cost of gambling harm

Individuals who gamble are at risk of experiencing a range of harms associated with their gambling, including financial, health, relationship, psychological, cultural, educational/occupational and crime related harms (Browne et al., 2016; Langham et al., 2016; Marionneau et al., 2022).

A comprehensive taxonomy of harms experienced by people who gamble was developed by academics in 2016, following a public health approach (Browne et al., 2016). This produced 73 gambling-related harm items, which were later developed in to the 10-item Short Gambling Harms Screen (SGHS; Browne et al., 2018).

Based on the Victorian prevalence estimates on a range of gambling-related harms, the social cost of gambling to the state of Victoria across these domains was estimated to be a total of $7 billion in 2014–15 (Browne et al., 2017). It is also important to note that gambling harms do not end as soon as gambling activity stops. Most legacy harms that accrue to gamblers have a half-life of 4 years, although financial harms last longer at 5 years (Rockloff et al., 2022).

Financial

Financial impacts due to gambling are often the primary harm, which then causes or exacerbates harms across other domains for the gambler, affected others and the community (Browne et al., 2016).

Financial harms identified in the Browne and colleagues' taxonomy of gambling-related harms (2016) included (but were not limited to) experiencing: a reduction or loss of discretionary spending on non-gambling-related entertainment or other family members' activities, erosion of savings, managing short-term cash flow (i.e. credit card debt, pay day loans, selling or pawning items), reduction in important expenses (i.e. insurances, health, household items, food, clothing, housing or accommodation), loss of major assets (i.e. car, home, business), and bankruptcy.

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FOI 27-145- Document 1

Other research has identified financial problems as including people not paying bills on time or going without basic necessities (Walker et al., 2012).

Individuals have reported being fired from their jobs due to gambling-related issues and others have reported paying off debt while in recovery from gambling (Kerber et al., 2015). In fact, consumer credit use and debt problems are risk factors for experiencing gambling-related harm (Swanton & Gainsbury, 2020) as gambling and the use of credit are positively correlated at the household level (Brown et al., 2012).

Psychological

Individuals with a gambling disorder have high rates of comorbid mood (37.9%) and anxiety (37.4%) disorders (Lorains et al., 2011). Moreover, self-harm is higher among people who are experiencing gambling harms (Gray et al., 2021), and people with a history of high-risk gambling have a higher risk of suicide (Andreeva et al., 2022).

High-risk online gambling is associated with poorer mental health outcomes, and individuals who engaged in excessive online gambling are more likely to experience symptoms of anxiety, depression and stress (Scholes-Balog & Hemphill, 2012).

People who experience gambling harms are over-represented in primary care and mental health treatment populations, with rates of high-risk gambling identified in up to 30% of treatment seekers (Lubman et al., 2017). High-risk gambling typically precedes and predicts the onset of other mental health conditions, suggesting that it has the potential to complicate treatment plans and hamper treatment outcomes, particularly if it goes unidentified and untreated (Lubman et al., 2017).

Emotional or psychological distress caused by gambling was itemised in Browne and colleagues' (2016) taxonomy of gambling-related harms and included (but was not limited to): reduced feelings of self-worth, distress from an inability to control gambling, guilt, increased feelings of powerlessness, distress from owing money, feeling shame or stigma, and suicidal ideation.

Relationships

Gambling harms can also extend beyond the gambler to others close to them (affected others) and the broader community (Browne et al., 2016; Langham et al., 2016). Gambling by both men and women intensifies intimate partner violence (IPV) against women, likely because financial, emotional and relationship stressors from gambling reinforce IPV (Hing et al., 2020).

Children who have a parent with high-risk gambling can be subjected to psychological, family, financial, physical and behavioural harms and may also experience violence (Suomi et al., 2022). Estimates of affected others in the general Australian adult population vary (2%–19%) based on definitions and measurement quality.

Nonetheless, it has been estimated that one individual's high-risk gambling negatively affects at least 6 others, where low-risk and moderate-risk gamblers impact one and three others, respectively (Goodwin et al., 2017). Other relationship harms identified in Browne and colleagues (2016) taxonomy of gambling-related harms included (but were not limited to): reduced amount and/or quality of time spent with people close to the gambler, increased level of neglect of relationships, conflict, separation, loss of other relationships and divorce.

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FOI 27-145- Document 1

Health

The Diagnostic and Statistical Manual of Mental Disorders fifth edition (DSM-V) considers a gambling disorder to be persistent and recurrent problematic gambling behaviour leading to clinically significant impairment or distress (American Psychiatric Association [APA], 2013). Health issues, alcohol use disorder and drug use disorder have relatively high prevalence in individuals diagnosed with a gambling disorder (Barnes et al., 2015; Petry et al., 2005).

Gambling disorder diagnosis is also associated with daily tobacco use (Ford & Håkansson, 2020). The directionality of the relationship between gambling and these health issues is yet to be clarified as binge drinking, tobacco use and cannabis use in youth have been shown to predict higher gambling rates at ages 31–32 (Merkouris et al., 2021). In their public health approach to gambling-related harm, Browne and colleagues (2016) identified specific decrements to health due to gambling, which included (but was not limited to): increased sedentary behaviour during time spent gambling, biological manifestation of psychological distress, reduced self-care (e.g. nutrition, loss of sleep, reduced quality of living), causing or exacerbating other behaviour that was a risk to their health (e.g. drinking alcohol, smoking, illicit drug use), self-harm, headaches or migraines, and an ongoing decrement to their health.

Work

Gambling can have several impacts related to work affecting the gambler, their employer and affected others. Work harms identified in the Browne and colleagues' (2016) taxonomy of gambling-related harms included: reduced performance, increased absenteeism, workplace consequences of using work resources for gambling, loss of job (i.e. due to poor performance, theft or fraud), and ultimately a legacy impact of reduced opportunity for employment due to past poor performance or criminal activity.

Job loss and reduced employment opportunities also impact others close to the gambler, such as their family, which may rely on their income for housing and other necessities (Browne et al., 2016). Lastly, employers are affected by the gamblers reduced work performance and the cost of replacing their employee due to job loss.

You win some, you lose more: recommendations from the parliamentary inquiry report into online gambling harm

Given the clear consensus in the literature surrounding the impacts of gambling advertising and the cost of gambling harm, the *You Win Some, You Lose More* parliamentary inquiry on online gambling harm provided the following recommendations in relation to gambling advertising (SPLA, 2023):

Recommendation 26

5.148 The Committee recommends the Australian Government, with the cooperation of the states and territories, implement a comprehensive ban on all forms of advertising for online gambling, to be introduced in 4 phases, over 3 years, commencing immediately:

- *Phase One: prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms. Removal of the exemption for advertising online gambling during news and current affairs broadcasts.*

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FOI 27-145- Document 1

Prohibition of advertising online gambling on commercial radio between 8.30–9.00 am and 3.30–4.00 pm (school drop-off and pick-up).

- *Phase Two: prohibition of all online gambling advertising and commentary on odds, during and an hour either side of a sports broadcast. Prohibition on all in-stadia advertising, including logos on players' uniforms.*
- *Phase Three: prohibition of all broadcast online gambling advertising between the hours of 6.00 am and 10.00 pm.*
- *Phase Four: by the end of year 3, prohibition on all online gambling advertising and sponsorship.*

5.149 Gambling advertising on dedicated racing channels and programming should be exempt from the ban.

5.150 Small community radio broadcasters should be exempt from further restrictions until December 2025.

The Committee also stated that 'lotteries have a lower risk of gambling harm than other forms of online gambling and should also be exempt from further restrictions' (SPLA, 2023, p 127). Since lotteries and wagering are the only legal forms of online gambling, the recommendations for a 'gambling' advertising ban only applies to wagering.

The growing evidence base on banning wagering advertising and an international example

Wagering advertisements and inducements have been shown to influence intended and actual betting behaviour (Browne et al., 2019). For example, sports bettors spend 56.2% more money and race bettors spend 94.8% more money if exposed to 5 or more wagering advertisements, compared to those exposed to none.

Evidence from a recent natural experiment showed betting on football games during the World Cup was affected by whether the individuals were watching the game on a TV channel showing advertisements compared to on a TV channel showing no advertisements. Specifically, individuals were 22%–33% more likely to place a bet on football, and had a 16%–24% increase in frequency of football betting, when a live game was televised on a channel with gambling advertisements compared to a channel without gambling advertisements (McGrane et al., under review).

Based on this evidence, and that greater harm is associated with greater exposure to wagering advertising, it is therefore reasonable to assume that a reduction in wagering advertising would result in a reduction in wagering behaviour and wagering-related harm.

Another approach to analysing the effectiveness of a gambling advertising ban is to look towards countries who have implemented similar regulation. In 2023, Belgium was one of the first countries to partially 'ban' gambling advertising (Federal Public Service Justice, 2023). The advertising ban applied to holders of licences for land-based casinos, gaming arcades, organising bets as well as online casino games, online arcade (dice) games, and online betting.

Despite the regulation, gambling operators found strategies to navigate the ban (De Jans et al., 2024). Examples of these strategies included increasing communication about their corporate social responsibility activities to create media coverage, posting about their sponsorship or charitable causes on their own channels, which would then be disseminated more broadly through the media. Other strategies included starting podcast shows, live streaming sports

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FOI 27-145- Document 1

matches on their websites, and organising free prize draws that do not require a betting account.

This report

The Australian Gambling Research Centre (AGRC) at AIFS has been commissioned by DITRDCA to estimate the socio-economic benefits of a ban on wagering advertising in Australia that reduces harm associated with wagering.

The scope of this proposed ban on wagering advertising by DITRDCA is broadly in line with elements of the Committee's recommendations under Phases 1 and 2, including:

- banning wagering advertising during live sports and 60 minutes on either side of the sports broadcast on television and radio
- banning wagering advertising during children's television programming
- limiting the frequency of wagering advertising on television and radio to no more than 2 advertisements per channel, per hour (between 6 am and 10 pm)
- banning wagering advertising on online platforms at all times, including social media, websites and apps.

Exclusions applied to wagering advertising on dedicated racing channels. Based on the above, the parameters provided by DITRDCA for estimating the socio-economic benefits on wagering advertising were: 100% ban for online and social media, 28% reduction for television and streaming, 25% reduction for radio and 80% reduction through betting affiliates.

This report contains estimates of the cost of wagering in Australia directly due to wagering expenditure (loss) and harms associated with wagering across several domains: financial, health relationships, psychological and work harms. This report also contains the impact of a partial ban on wagering advertising as represented by the benefits (cost saving) to the total cost, estimated on the average changes in wagering days per year in respect to PGSI categorisation.

Methodology

The aim of this study is to estimate socio-economic benefits of a partial ban on wagering advertising in Australia for 2023. Outlined below are the steps taken to estimate the socio-economic costs of wagering in Australia (steps 1 to 2) and the benefits (cost savings) due to the proposed wagering advertising ban (steps 3 to 5).

1. Estimate how many wagerers are categorised in non-risk, low-risk, moderate-risk and high-risk gambling in Australia (4 PGSI categories).
2. Estimate the total cost of wagering in Australia.
3. Estimate how many days wagering per year the proposed wagering advertising ban can reduce in each PGSI category.
4. Estimate how much the reduction in days wagering per year in each PGSI category generates in cost savings.
5. Calculate net cost savings (benefit) from all 4 PGSI categories.

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FOI 27-145- Document 1

Twelve wagering items across 6 domains were used in the calculations to arrive at the total costs and cost savings as outlined in Table 1 below.

Table 1: Cost framework for wagering in Australia, 2023

Cost category	Sub-category	Cost attributed to
Direct wagering expenditure (loss)	Direct wagering expenditure (loss) and, within this measure, excessive wagering spend	Wagerer
Financial	Bankruptcy	
	Administration of bankruptcy	Government
	Unpaid debts	Affected others and community (i.e. business)
Health	Mild alcohol dependence	Wagerer
	Expenditure on alcohol around wagering	Wagerer
	Drug use disorder	Wagerer
Relationships	Financial cost of separation	Government and community (i.e. business)
	Emotional distress to affected others	Affected others
Psychological	Depression	Wagerer
	Anxiety	Wagerer
	Other psychological harm	Wagerer
Work	Absenteeism	Community (i.e. employers)
	Reduced work performance	Community (i.e. employers)

Data sources

Several key data source types were required to calculate: (a) the cost of wagering in Australia and (b) the benefit of a reduction in wagering advertising in Australia:

- Australian adult population prevalence of wagering (in the last 12 months) overall and by Problem Gambling Severity Index (PGSI) status
- Australian adult population prevalence of regular wagering (at least monthly in last 12 months) overall and by PGSI status
- prevalence of costed harm items due to wagering by PGSI status
- exposure to wagering advertisement by medium (e.g. TV, radio, etc.) and PGSI status
- average cost per harm item.

Prevalence of wagering in Australia

Data on the prevalence of wagering in Australia in total and by PGSI was sourced from the HILDA Wave 22 weighted dataset for adults who participated in sports or race wagering in the past 12 months in 2022 (8% of adults). These 2022 prevalence estimates were then applied to the Australian adult population as of 30 June 2023 (Australian Bureau of Statistics [ABS], 2024). Table 2 shows the prevalence estimates of wagering in Australia in 2023 by PGSI status.

An estimated total of 1,680,985 Australian adults wagered in 2023. The prevalence figures for any gambling activity are included in the table for the purpose of contextualising wagering relative to all gambling.

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FOI 27-145- Document 1

Table 2: Prevalence of gambling and wagering in Australia, by problem gambling severity, 2023

Problem gambling severity index (PGSI)	Prevalence in the Australian adult population (%), 2023		Estimated number in the Australian adult population, 2023	
Non-gambler (last 12 months)	65.5		13,693,715	
	Any gambling	**Wagering**	**Any gambling**	**Wagering**
Non-risk gambling (PGSI = 0)	27.4	4.8	5,720,688	1,008,653
Low-risk gambling (PGSI = 1–2)	3.6	1.5	750,083	315,191
Moderate-risk gambling (PGSI = 3–7)	2.4	1.2	505,627	254,027
High-risk gambling (PGSI ≥ 8)	1.1	0.5	223,562	103,114
Total	**34.5**	**8.0**	**7,199,960**	**1,680,985**

Notes: Sourced from weighted HILDA Wave 22 dataset, projected to the Australian adult population 30 June 2023 (ABS, 2024).

Table 3 shows the estimated 2023 prevalence of regular (at least monthly) wagering in the Australian adult population in total and by PGSI status. These estimates were based on the 2022 data from the Community Attitudes Study (CAS) figures for wagering frequency by PGSI status, projected onto the estimated 2023 wagering population. CAS 2022 data were used to produce these estimates as the HILDA Wave 22 dataset did not collect frequency data for wagering or other gambling activities.

The estimated 2023 prevalence of regular wagering (monthly or more) in the Australian adult population was 467,980 wagerers.

Table 3: Prevalence of wagering in Australia, by frequency, 2023

Problem gambling severity index (PGSI)	Prevalence in the Australian adult population (%), 2023		Estimated number in the Australian adult population, 2023	
Wagering frequency	**Less than monthly**	**Monthly or more**	**Less than monthly**	**Monthly or more**
Non-risk wagerer (PGSI = 0)	81.4	18.6	820,741	187,912
Low-risk wagerer (PGSI = 1–2)	72.6	27.4	228,860	86,331
Moderate-risk wagerer (PGSI = 3–7)	54.5	45.5	138,419	115,608
High-risk wagerer (PGSI ≥ 8)	24.2	75.8	24,985	78,129
Total	**64.4**	**35.6**	**1,213,005**	**467,980**

Notes: Proportions of wagering frequency by PGSI sourced from the Community Attitudes Study (2022) dataset, applied to the weighted HILDA Wave 22 dataset (total wagering) and projected to the Australian adult population 30 June 2023 (ABS, 2024).

Prevalence of wagering harm

HILDA data

HILDA contains economic, health and wellbeing data, collected through a household-based panel. The analyses only used data from the questions of interest collected in HILDA Wave 22. In relation to gambling, HILDA includes 2 survey question items of value to our methodology.

The first item is on gambling participation (expenditure) and the second is the PGSI. The SF-36 used in this analysis was derived through the HILDA survey as it covers 8 key domains of physical and mental health and wellbeing: physical functioning (PF), role-physical (RP), bodily

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FOI 27-145- Document 1

pain (BP), general health (GH), vitality (VT), social functioning (SF), role-emotional (RE) and mental health (MH) (Rand Corporation, 2024).

The MH domain was used to investigate the relationship between gambling harm and the impact on mental health. Additionally, HILDA provides information on major life events, asking respondents if in the past 12 months they have either 'separated from their spouse' and/or experienced a 'major worsening in financial situation (e.g. went bankrupt)'. As the question includes financial hardship other than bankruptcy, it was assumed 5% of those who experienced 'major worsening in financial situations' had experienced bankruptcy.

These items were used in this analysis to analyse the impact of gambling harms on separation and bankruptcy. Table 4 shows the prevalence figures of bankruptcy, depression and separation used in the analysis. See Appendix C for the HILDA Wave 22 questions sourced for this analysis.

Table 4: Prevalence of bankruptcy, depression and separation in Australia, by problem gambling severity, 2023 (HILDA W22 data)

Item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)
Estimated 2023 Australian adult population wagerers (last 12 months)	1,008,653	315,191	254,027	103,114
Prevalence of bankruptcy in the Australian adult wagering population (%), 2023	558 (0.06%)	202 (0.06%)	163 (0.06%%)	307 (0.30%)
Prevalence of depression (SF-36 < 40) in the Australian adult wagering population (%), 2023	42,235 (4.19%)	14,366 (4.56%)	17,896 (7.05%)	20,059 (19.45%)
Prevalence of separation in the Australian adult wagering population (%), 2023	28,569 (2.83%)	10,827 (3.44%)	7,645 (3.01%)	7,833 (7.60%)

Notes: Sourced from weighted HILDA Wave 22 dataset, projected to the Australian adult population 30 June 2023 (ABS, 2024).

National Gambling Trends Study data

The National Gambling Trends Study (NGTS) is a mixed methods online survey conducted annually. It provides trends on gambling participation, emergent issues and future directions related to gambling participation and harm. The 2023 NGTS sample included respondents who gambled regularly, which is defined as gambling at least once a month or more on either online wagering or land-based electronic gaming machines (pokies).

The 2023 online wagering sample data were used in the estimations of the socio-economic costs of wagering. Table 5 provides the prevalence estimates by PGSI status for each harm item used to estimate the cost of wagering in Australia from the NGTS 2023 dataset. See Appendix C for the NGTS 2023 questions sourced for this analysis.

Items that counted the impacts to wagerers included: excessive wagering spend, mild alcohol dependence, alcohol expenditure around wagering, drug use disorder, depression, anxiety, and other psychological harm. Relationship harm was considered an impact to affected others (i.e. family, friends, colleagues) that would cause emotional distress. Reduced work performance and absenteeism were costs to the community, primarily employers.

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FOI 27-145- Document 1

Table 5: Prevalence estimates (*n*, %) for harm items by PGSI for regular wagerers, 2023

Item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Item description
Population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	See Table 3
Financial harm					
Excessive wagering spend	0.0%	0.5%	31.5%	68.0%	Excessive spend as the increase in average annual wagering by PGSI scores ≥1 factoring in average number of financial harms above that of non-risk (problem) gamblers (PGSI = 0). Prevalence figures represent percentage of total excessive wagering spend by PGSI category.
Psychological harm					
Depression[a]	940 (0.5%)	1,727 (2.0%)	12,717 (11.0%)	42,268 (54.1%)	Depression related to gambling/online wagering
Anxiety	1,315 (0.7%)	8,029 (9.3%)	48,555 (42.0%)	73,442 (94.0%)	Anxiety or stress related to gambling/online wagering
Other psychological harm	5,262 (2.8%)	44,080 (51.1%)	62,232 (53.8%)	4,094 (5.2%)	Other psychological harm (minus depression and anxiety) due to gambling/online wagering
Relationship harm					
Emotional distress to affected others	5,825 (3.1%)	15,626 (18.1%)	61,503 (53.2%)	71,801 (91.9%)	Any harm to relationships due to gambling/online wagering
Health harm					
Mild alcohol dependence	50,493 (26.9%)	30,838 (35.7%)	45,701 (39.5%)	39,383 (50.4%)	Hazardous drinking (AUDIT-C) and consumes alcohol around online wagering
Expenditure on alcohol around wagering	36,002 (19.2%)	21,611 (25.0%)	31,922 (27.6%)	23,323 (29.9%)	Average yearly spend on alcohol around online wagering for those providing typical spend
Drug use disorder	8,080 (4.3%)	4,230 (4.9%)	13,064 (11.3%)	17,110 (21.9%)	Affected by illicit drugs in last 12 months while gambling
Work harm					
Reduced work performance	2,067 (1.1%)	2,417 (2.8%)	8,902 (7.7%)	24,845 (31.8%)	Reduced performance at work/study due to gambling
Absenteeism	661 (0.4%)	1,435 (1.7%)	3,276 (2.8%)	17,735 (22.7%)	Estimated work absenteeism based on reduced work performance using figures from Li et al. (2017)

Notes: Sourced from NGTS 2023 dataset (monthly wagerers), applied to the weighted HILDA Wave 22 dataset (last 12-month wagerers) and projected to the Australian adult population 30 June 2023 (ABS, 2024). [a]Depression from the NGTS 2023 data was not included in the total cost of wagering due to factoring in double counting with HILDA data.

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FOI 27-145- Document 1

However, depression from NGTS 2023 data that was comorbid with anxiety or other psychological harm was subtracted from the cost calculations for those harm items.

Estimation of cost items

Table 6 summarises the cost estimation for each item and the data sources used in determining the average cost per item.

Table 6: Harm cost items and sources, 2023

Cost item	Cost estimation	Cost estimate data source/s	Cost bearer
Direct financial loss			
Yearly wagering expenditure (loss)	Total wagering expenditure for 2023 by PGSI category	HILDA Wave 22 dataset – percentage of total wagering expenditure by PGSI category H2 Gambling Capital (2024) – total betting (onshore) gross win in Australian dollars ($ million) for race and sports betting for 2023 (projected)	Wagerer
Financial harm			
Excessive wagering spend	Increased average annual wagering spend by PGSI score weighted by increased relative prevalence of number of financial harms by PGSI score – for PGSI score ≥1 beyond that of non-risk gamblers (PGSI = 0)	NGTS 2023 dataset – average wagering spend per year by PGSI score and average number of financial harms reported	Wagerer
Bankruptcy	Cost of fees for administering bankruptcy ($9,630) + cost of unpaid debts due to bankruptcy ($28,152) = $37,782	Fees and charges for bankruptcy (Australian Financial Security Authority (n.d.)) – Fees and charges for the cost of administering bankruptcy 2023 VCEC (2012) – cost of unpaid debts estimate 2011, adjusted CPI to 2023 (ABS, 2024)	Administration of bankruptcy – government Unpaid debts – affected others and community (business)
Psychological harm			
Depression – emotional distress to wagerer	Statistical Value of Life in a Year (VLY) in 2023 dollars $235,000 x mean disability weight for mild major depressive disorder (0.1454)	Department of the Prime Minister and Cabinet (2023) – VLY 2023 Global Burden of Disease Collaborative Network (2024) – Global Burden of Disease Study 2021 (GBD 2021) mean disability weight (DW) for mild major depressive disorder	Wagerer
Anxiety – emotional distress to wagerer	Statistical Value of Life in a Year (VLY) in 2023 dollars $235,000 x mean disability weight for mild anxiety disorder (0.0296)	Department of the Prime Minister and Cabinet (2023) – VLY 2023 Global Burden of Disease Collaborative Network (2024) – Global Burden of Disease Study 2021 (GBD 2021) mean disability weight (DW) for mild anxiety disorder	Wagerer

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FOI 27-145- Document 1

Cost item	Cost estimation	Cost estimate data source/s	Cost bearer
Other psychological harm	Statistical Value of Life in a Year (VLY) in 2023 dollars $235,000 x mean disability weight (DW) by PGSI status (non-risk gambler = 0; low-risk gambler = 0.13; moderate-risk gambler = 0.29; high-risk gambler = 0.44) x attributable fraction of DW from psychological harm (minus depression and anxiety) of 33.6%	Department of the Prime Minister and Cabinet (2023) – VLY 2023 Victorian Gambling-Related Harms Study (Browne et al., 2016) national survey dataset – disability weights for PGSI categories NGTS 2023 dataset – average number of harms by harm domain: financial, depression/anxiety, other psychological harms, relationships, work/study, and crime	Wagerer
Relationship harm			
Financial cost of separation	An estimate of overall average cost of separation (borrowing funds, sourced from legal law providers specialising in family law): $21,554	The State of Separation Impact Report 2023 (2023, page 15). The cost $21,088 (Dec 2022) converted to June 2023 cost using CPI (ABS, 2024)	Government and community (business)
Emotional distress to affected others	Average amount of financial assistance awarded to victims of crime on final determination in 2022–23 – $9,180 x average number of affected others by PGSI category	Victims of Crime Assistance Tribunal (VOCAT) (2023, page 27) Goodwin et al. (2017) – average number of affected others by PGSI category: 1:1 (low-risk gambler); 1:3 (moderate-risk gambler); 1:6 (high-risk gambler). Authors assumed 1:0.5 non-risk gambler to affected others.	Affected others
Health harm			
Mild alcohol dependence	Statistical Value of Life in a Year (VLY) in 2023 dollars $235,000 x mean disability weight for mild alcohol dependence (0.2353)	Department of the Prime Minister and Cabinet (2023) – VLY 2023. Global Burden of Disease Collaborative Network (2024) – Global Burden of Disease Study 2021 (GBD 2021) mean disability weight (DW) for mild alcohol dependence	Wagerer
Expenditure on alcohol around wagering	Average typical yearly expenditure on alcohol consumed around wagering	NGTS 2023 dataset – average yearly spend on alcohol for last online wagering session by PGSI category, for sample reporting this as a typical session	Wagerer
Drug use disorder	Statistical Value of Life in a Year (VLY) in 2023 dollars $235,000 x mean disability weight for other drug use disorder (0.1156)	Department of the Prime Minister and Cabinet (2023) – VLY 2023 Global Burden of Disease Collaborative Network (2024) – Global Burden of Disease Study 2021 (GBD 2021) mean disability weight (DW) for other drug use disorder	Wagerer
Work harm			
Absenteeism	Average annual cost to business per employee due to absenteeism (direct labour cost + indirect costs)	2019 Absence Management & Wellbeing Survey (Direct Health Solutions, 2019) – $281 direct labour costs per absent day + $563 indirect costs per absent day (1:1, e.g. replacement labour, training tec). Total $844 in 2019 cost converted to 2023 cost of $982 using CPI (ABS, 2024)	Community (employers)
Reduced work performance	Average annual cost to business per employee due to reduced work performance	50% the cost of absenteeism (see above) – $491.	Community (employers)

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FOI 27-145- Document 1

The data used to estimate the impact of wagering advertising on days wagering

The Community Attitudes Study (CAS) data on wagering advertising was used to estimate the number of days wagering per year can be reduced by the proposed ban and, in turn, how much wagering harms can be reduced. CAS was conducted in July 2022 with 1,765 respondents aged 18 years or older. The age, gender and location of residence of the participants in this sample is aligned with ABS population parameters, making it suitable for our analysis.

This survey included questions about individuals' exposure to wagering advertisements, their gambling participation in the past 12 months, the products used, amount of money spent, platform used, and gambling-related harm as measured by the PGSI. For this analysis, the question item asking participants frequency of having seen or heard wagering advertising in the last 12 months by advertising medium was used.

The wagering advertising mediums included: television, streamed content (e.g. Kayo, SBS on Demand), radio, print media (e.g. newspapers, magazines), outdoor signage (e.g. stadiums, billboards), team/player uniforms or merchandise, social media (e.g. Facebook), online (e.g. news websites, YouTube, podcasts), direct messages (e.g. email, SMS) and betting affiliates (e.g. through paid third-party publishers/bloggers/tipsters). While CAS asked participants about their gambling expenditure, this analysis focused on the question item addressing respondents' wagering activities on racing and sports betting.

Respondents could state their engagement in sports and race betting as 'not in the past 12 months', 'once or twice a year', 'a few times a year', 'about once a month', '2 to 3 times a month', 'about once a week', '2 to 3 times a week' or '4 or more times a week'. The main data sources from CAS used in the analysis were:

- frequency of exposure to wagering advertising in the past 12 months by medium converted to days per year
- frequency of wagering in the past 12 months converted to days per year
- yearly wagering expenditure (estimated from typical daily expenditure and wagering frequency)
- PGSI status: non-risk, moderate-risk and high-risk.
- socio-demographics (control variables)
- frequency of gambling on activities other than sports and race betting in the past 12 months converted to days per year (control variables).

See Appendix C for the CAS questions sourced for this analysis.

Data analysis

Approach to cost calculations

The framework applied in estimating the cost of wagering to Australia in 2023 generally followed the formula below, costing each harm item by PGSI category and totalling the cost. The calculations for each harm item are presented in the results section along with the findings. The basic approach was the following formula with 4 key components (A to D):

$$Total\ Cost = A \times B \times C \times D \qquad (1)$$

Where:

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FOI 27-145- Document 1

- A is the number of last 12-month wagerers (HILDA) or regular wagerers (NGTS 2023 data) experiencing harm item in the adult Australian population, by PGSI category
- B is the 80% counterfactual adjustment (unless otherwise stated)
- C is the cost of item per person
- D is the disability weight (mean) – psychological and health harm items only

Disability weights were only applied to health status conditions available from the Global Burden of Disease Study 2021 under the psychological domain (depression, anxiety) and the health domain (alcohol, illicit drugs). Otherwise, the formula followed A x B x C.

80% counterfactual adjustment

The approach to the cost calculations included applying an 80% counterfactual adjustment to the estimated population experiencing each harm item. This approach is consistent with previous gambling costing studies conducted by the Productivity Commission (1999), the VCEC (2012), and Browne et al. (2017).

Double-counting adjustment

To avoid double-counting items with potential comorbidity (e.g. anxiety and depression) or an overlap between the HILDA Wave 22 data (last 12-month wagerers) and NGTS 2023 data (at least monthly wagerers), the following discounts were applied in the calculations.

- The cost of excessive wagering spend for regular wagerers is reported as a sub-component of total yearly wagering expenditure for the entire wagering population (not added to it).
- The number of regular wagerers experiencing other psychological harms were discounted by the overlapping population also experiencing anxiety and depression.
- The cost of depression for regular wagerers was calculated from the NGTS 2023 data ($1.58 billion) but was not reported on, given depression was costed for last 12-month wagerers using the HILDA Wave 22 data.
- The cost of credit card debt due to wagering for regular wagerers was calculated from the NGTS 2023 data ($104 million) but was not reported on for a few reasons:
  - Credit card debt would overlap partially with the cost of unpaid debt due to bankruptcy for last 12-month wagerers using HILDA data.
  - As of 11 June 2024, the use of credit cards for online gambling was prohibited under the Interactive Gambling Amendment (Credit and Other Measures) Bill 2023 (Cth), no. 114. Therefore, any future bans on wagering advertising would have no impact on credit card debt associated with wagering given its prohibition.
- The emotional cost of separation to affected others was excluded, as this may partially overlap with the cost estimated for relationship harm to affected others.

Calculating expenditure items

Three types of expenditure were calculated in the cost analysis by PGSI category:

- total wagering expenditure in Australia for 2023
- excessive wagering expenditure as an indicator of financial harm
- financial cost of alcohol expenditure around wagering.

The total wagering expenditure in Australia for 2023 was sourced from H2 Gambling Capital data (24 May 2024 update) as the projected 2023 ‘gross win’ (expenditure loss) total for

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FOI 27-145- Document 1

onshore race and sports betting. ‘Onshore’ betting includes wagering service providers (WSPs) licensed in Australia, excluding the ‘offshore’ expenditure loss by Australians through unlicensed, and therefore unregulated, wagering service providers.

The total project onshore wagering expenditure for 2023 was projected at $AU 7.5 billion. The HILDA Wave 22 dataset was used to estimate wagering expenditure by PGSI category. Total year wagering expenditure was calculated from the monthly wagering expenditure figure in HILDA and the proportion of the total wagering expenditure was calculated by PGSI category (32.9% non-risk, 19.2% low risk, 29.3% moderate risk, and 18.5% high risk). These proportions by PGSI category were then applied to the total $7.5 billion for 2023 wagering expenditure. The results are reported in the results section under ‘Yearly wagering expenditure’.

The NGTS 2023 data were used to calculate, of the total 2023 wagering expenditure, the proportion of which was considered excessive and resulting in financial harm, also known as an opportunity cost. The calculation followed that of Browne and colleagues (2017, pp 43–44) in estimating the relative increase in spends and financial harms as PGSI increases, using this costing formula:

$$C = \sum_{\substack{k=1 \\ (PGSI)}}^{15+} N_k \cdot (S_k - S_0) \cdot \left(1 - \frac{H_0}{H_k}\right) \qquad (2)$$

where $\left(1 - \frac{H_0}{H_k}\right)$ describes the weight *W*, or the proportion of the excessive spend incurred in excess of any entertainment benefit. It is assumed that 100% of the spend S_0 by recreational wagerers (PGSI score of 0) is theoretically all entertainment and therefore not harmful. In the NGTS data this was reflected in the average number of financial harms experienced by non-risk gamblers equalling 0.04 harms. As financial harms *H* increase for non-recreational wagerers with increasing PGSI score *k*, then a relative proportion (weight) of the increased spend $(S_k - S_0)$ by those with non-zero PGSI scores is considered an excessive spend resulting in financial harms. The financial harms *H* variable was the average harms by PGSI score experienced (out of a total of 6 financial harms). The expenditure variable used was the average yearly wagering spend by PGSI score. The results are reported in the results section under the ‘Cost of excessive wagering expenditure’.

The NGTS 2023 data were also used to estimate the financial cost of alcohol expenditure around wagering. Regular wagerers in NGTS who reported consuming alcohol around their last wagering session were asked to report the amount spent on alcohol, as well as whether their last wagering session expenditure was ‘typical’. Average yearly expenditure on alcohol consumed around wagering was estimated for those who reported it as a typical session, and the average alcohol expenditure by PGSI category was used in the cost calculations.

Calculating other psychological harms

The NGTS 2023 dataset contained psychological harms experienced by regular wagerers separate to depression and anxiety. The approach to costing other psychological harms followed that taken by Browne and colleagues (2017) using a Burden of Disease (BoD) methodology to calculate the attributable fraction of ‘other psychological harms’ relative to other types of harms to the disability weights for gambling by PGSI score.

A regression dominance analysis was implemented on the NGTS 2023 data of 29 harms, using the average number of harms reported within the psychological, health, financial, relationship, work/study, and crime domains. Psychological harms were split into depression/anxiety and other psychological harms to partition out the unique variance other psychological harms attributed to the disability weight (an estimated 33.6%).

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FOI 27-145- Document 1

Dominance analysis involves fitting multiple subset models with different combinations of predictors. For each predictor, the marginal contribution to the model's *R*-squared is calculated. This is the increase in *R*-squared when the predictor is added to a model that does not include it. The marginal contributions of each predictor are then averaged over all possible orders of inclusion in the model.

The results from dominance analysis provide relative importance scores for each predictor. These scores indicate how much each predictor contributes to the total *R*-squared, expressed as a proportion. The scores are normalised to sum to 1 (or 100%). The results of the dominance analysis are shown in Table 7 below.

The cost calculation then followed the same approach of A (population experienced) x B (80% counterfactual) x C (cost of item) x D (disability weight for PGSI status) with an additional x E = attributable fraction other psychological harm (33.6%). Note that the main difference from the Browne and colleagues' (2017) approach is that the cost of other psychological harm used the Statistical Value of Life in a Year (VLY) in replacement of GDP.

Table 7: Regression dominance analysis estimated of the relative contribution of other psychological harm to disability weights (NGTS 2023 data)

Gambling-related harm domains	Relative contribution (%)
Financial harms	30.5
Other psychological harms	33.6
Depression/anxiety	16.0
Relationship harms	12.1
Health harms	4.7
Work or study harms	2.7
Crime harm	0.4

Calculating the effectiveness of a wagering advertising ban

The analysis involved a two-step approach using the Community Attitudes Study data (CAS 2022).

The analysis involved using 2 multiple linear regression models to predict the number of days an individual wagered in the past year from the set of wagering advertising exposure variables: the number of days per year individuals were exposed to wagering advertisements through TV, streaming, radio, print, signage, merchandise, social media, online, direct messaging and betting affiliates.

The calculation included control variables that accounted for gambling frequencies for lotteries, keno/bingo, electronic gaming machines (EGMs or pokies), casino table games, online casino games, esports betting, fantasy sports betting, novelty betting and virtual sports betting. The model also included the following demographic control variables: age, gender, English language proficiency, First Nations status, living alone, number of dependent children, education level, employment status and income.

The linear regression models were specified as follows:

$$\boldsymbol{Y} = \alpha + \boldsymbol{E\beta} + \mathbf{C}\boldsymbol{\gamma} + \boldsymbol{\varepsilon} \qquad (3)$$

Where:

- n is the total sample size

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- i is the number of exposure variables
- j is the number of control variables
- $\boldsymbol{Y}$ is an $n \times 1$ column vector containing the number of days wagered in the past 12 months
- α is the intercept of the model
- $\boldsymbol{E}$ is an $n \times i$ matrix containing exposure variable values
- $\boldsymbol{\beta}$ is a $i \times 1$ column vector of estimated coefficient parameters for the exposure variables
- $\boldsymbol{C}$ is an $n \times j$ matrix containing control variable values
- $\boldsymbol{\gamma}$ is a $j \times 1$ column vector of estimated coefficient parameters for the control variables
- $\boldsymbol{\varepsilon}$ is an $n \times 1$ column vector containing residual error values.

The effect of wagering advertising bans was simulated by adjusting the values of the wagering advertising exposure variables for several types of mediums. The adjustments were based on the proposed restrictions on wagering advertising by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA):

- Television and streaming: reduced by 28%
- Radio: reduced by 25%
- Social media and online: completely banned (reduced by 100%)
- Betting affiliates: reduced by 80%.

Two linear regression models were estimated based on equation $\boldsymbol{Y} = \alpha + \boldsymbol{E\beta} + \mathbf{C}\boldsymbol{\gamma} + \boldsymbol{\varepsilon}$ (3) that predict the number of days wagering per year, where one model used the unadjusted data (i.e. in place of $\boldsymbol{E}$) and one model used the adjusted data (i.e. in place of $\boldsymbol{E}$). These analyses provided us with 2 sets of values for the number of days wagering per year: one set based on no ban in advertising and one set based on a partial ban in advertising. These 2 sets of values were used in step 2, which used 2 ordered logistic regression model.

Ordered logistic regression models were conducted to predict membership probabilities in the no-risk, low-risk, moderate-risk and high-risk problem gambling severity index categories. The predictors were the same as the linear regression models but excluded the exposure frequency variables and instead included the number of days wagering per year estimated from the linear regression models.

The ordered logistic regression models were specified as follows:

$$logit\big(P(\boldsymbol{Y} \leq k)\big) = \boldsymbol{\alpha}_k - (\boldsymbol{W}\beta + \boldsymbol{C\gamma}) \quad \text{for } k = 1, 2, 3 \qquad (4)$$

Where:

- n is the total sample size
- j is the number of control variables
- $\boldsymbol{Y}$ is an $n \times 1$ column vector containing the problem gambling severity index categories represented as integer values from 1 to 4
- $\boldsymbol{\alpha}$ is a 3×1 column vector containing the intercept values for each value of k and serves as the cut-off threshold in the model
- $\boldsymbol{W}$ is an $n \times 1$ column vector containing wagering variable values
- β is an estimated coefficient parameter for the number of days wagering variable
- $\boldsymbol{C}$ is an $n \times j$ matrix containing control variable values
- $\boldsymbol{\gamma}$ is a $j \times 1$ column vector of estimated coefficient parameters for the control variables.

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FOI 27-145- Document 1

To simulate the effect of proposed wagering advertising restrictions on at-risk gambling, the predicted probabilities for the Problem Gambling Severity Index categories were calculated using the difference in predicted probabilities of category membership between the model with no wagering advertising ban and the model with a partial wagering advertising ban represents the potential impact of the advertising restrictions. The differences in predicted probabilities estimated were:

$$\Delta P(\text{Non Risk Gambling}) = 0.177\%$$

$$\Delta P(\text{Low Risk Gambling}) = 0.045\%$$

$$\Delta P(\text{Moderate Risk Gambling}) = -0.02\%$$

$$\Delta P(\text{High Risk Gambling}) = -0.202\%$$

Note: ΔP denotes the difference in predicted probabilities between pre-ban and post-ban ($\Delta P = P_{post} - P_{pre}$)

Note that when the probability values are negative then that PGSI category has had a reduction in numbers due to the proposed wagering advertising ban. If the values are positive, then that PGSI category has had an increase in numbers due to the advertising ban. An increase in numbers may occur if high-risk gamblers move down to low-risk or non-risk groups, which would increase numbers in the lower risk categories.

The predicted probabilities from the CAS dataset were then used to generalise the findings to the wider wagering population in Australia, by using the HILDA dataset to determine the change in number of wagerers in each of the PGSI categories. This was done by multiplying the differences in predicted probabilities by the number of total wagerers in HILDA as follows:

$$\text{Change in Non Risk Gambling} = \Delta P(\text{Non Risk}) \times \text{Total Wagerers}$$

$$\text{Change in Low Risk Gambling} = \Delta P(\text{Low Risk}) \times \text{Total Wagerers}$$

$$\text{Change in Moderate Risk Gambling} = \Delta P(\text{Moderate Risk}) \times \text{Total Wagerers}$$

$$\text{Change in High Risk Gambling} = \Delta P(\text{High Risk}) \times \text{Total Wagerers}$$

The Change in Non Risk Gamblers, Change in Low Risk Gamblers, Change in Moderate Risk Gamblers and Change in High Risk Gamblers values were used as the basis for all of the socio-economic benefit calculations. These values represent the increase or decrease in the number of wagerers that fall into a PGSI category after the advertising ban.

For example, if Change in High Risk Gamblers = -5,000, then there are 5,000 less high-risk wagerers in the population as a result of the wagering advertising ban. Similarly, if Change in Low Risk Gamblers = 5,000, then there are 5,000 more low-risk wagerers in the population as a result of the wagering advertising ban. Note that this calculation assumes that the total number of wagerers does not change after the wagering advertising ban. It only models how individuals may move between non-risk, low-risk, moderate-risk and high-risk PGSI categories as a result of the wagering advertising ban.

Modelling the total number of individuals who stop wagering due to advertising was not feasible given the data did not include individuals who do not wager or who have stopped wagering recently. One option was to assume that individuals who are reduced to zero days wagering

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FOI 27-145- Document 1

have stopped wagering – however, this assumes a linear relationship between advertising exposure and wagering behaviour.

It is likely that there are threshold effects, where certain levels of advertising exposure have a more significant impact, or no impact at all at lower levels of wagering. Keeping total wagerers constant in the analysis likely results in an underestimation of the benefit of the ban because it ignores the potential for an advertising ban to result in an individual stopping all wagering behaviour.

In the socio-economic benefit calculations, the pre-ban cost to financial, health, relationships, psychological and work domains for individuals in each of the PGSI categories is calculated using the H2 Capital, HILDA and NGTS datasets. Then, by applying the changes in numbers in each of the PGSI categories due to the advertising ban, the socio-economic benefit for each of the harm domains can be estimated. See Appendix B for an example calculation using the depression domain.

Results

Total cost of wagering in Australia, by cost category and PGSI

Table 8 summarises the estimated total socio-economic costs of wagering in Australia in 2023 by PGSI category. The total overall cost was calculated at $26.7 billion dollars, with 30.6% of the total cost attributed to high-risk wagering ($8.2 billion), 29.8% to moderate-risk wagering ($8.0 billion), 15.1% to low-risk wagering ($4.0 billion) and 24.6% to non-risk wagering ($6.6 billion). A total of $7.5 billion (28% of total) in wagering expenditure (loss) by wagerers was estimated for 2023.

Across the harm domains, the largest cost was to health ($8.2 billion, 30.6% of total) followed by relationship harm ($5.6 billion, 20.9% of total), psychological harm ($4.9 billion, 18.4% of total), work harm ($497.7 million, 1.9% of total) and the financial harm of bankruptcy ($37.2 million, 0.1% of total).

Table 8: Total cost of wagering in Australia, by PGSI category, 2023

Cost item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population wagerers (last 12 months) (A)	1,008,653	315,191	254,027	103,114	1,680,985
Estimated 2023 Australian adult population regular wagerers (≥ monthly) (B)	187,912	86,331	115,608	78,129	467,980
Direct wagering expenditure					
Yearly wagering expenditure (loss) (A)	$2,461,694,609	$1,439,315,136	$2,191,129,976	$1,394,960,278	$7,487,100,000
Financial harm					
Bankruptcy – cost of administration (A)	$4,297,448	$1,554,445	$1,252,799	$2,365,972	$9,470,664
Bankruptcy – cost of unpaid debts	$12,563,008	$4,544,208	$3,662,387	$6,916,599	$27,686,202

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FOI 27-145- Document 1

Cost item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Total financial cost	**$16,860,457**	**$6,098,652**	**$4,915,186**	**$9,282,571**	**$37,156,866**
Psychological harm					
Depression (emotional distress to wagerers) (A)	$1,154,771,878	$392,780,650	$489,319,579	$548,439,922	$2,585,312,029
Anxiety (emotional distress to wagerers) (B)	$7,320,879	$44,684,717	$270,237,696	$408,745,454	$730,988,746
Other psychological harm to wagerers (B)	$0	$362,058,697	$1,140,243,953	$113,811,935	$1,616,114,585
Total psychological cost	**$1,162,092,757**	**$799,524,064**	**$1,899,801,228**	**$1,070,997,311**	**$4,932,415,360**
Relationship harm					
Financial cost of separation (A)	$492,620,752	$186,696,474	$131,824,588	$135,065,156	$946,206,969
Emotional costs to affected others (B)	$21,390,413	$114,756,400	$1,355,039,036	$3,163,837,169	$4,655,023,018
Total relationship cost	**$514,011,165**	**$301,452,874**	**$1,486,863,624**	**$3,298,902,325**	**$5,601,229,987**
Health harm					
Mild alcohol dependence (B)	$2,233,196,449	$1,363,883,636	$2,021,242,343	$1,741,831,084	$7,360,153,512
Expenditure on alcohol around wagering (B)	$53,103,002	$38,861,325	$87,114,184	$75,047,651	$254,126,162
Drug use disorder (B)	$109,715,986	$57,439,203	$177,382,736	$232,330,091	$576,868,016
Total health cost	**$2,396,015,438**	**$1,460,184,164**	**$2,285,739,262**	**$2,049,208,826**	**$8,191,147,690**
Work harm					
Absenteeism (B)	$7,797,133	$16,918,614	$38,615,552	$209,057,339	$272,388,638
Reduced work performance (B)	$12,183,020	$14,247,254	$52,466,783	$146,436,477	$225,333,533
Total work cost	**$19,980,152**	**$31,165,868**	**$91,082,335**	**$355,493,816**	**$497,722,171**
Total cost of wagering in Australia	**$6,570,654,577**	**$4,037,740,758**	**$7,959,531,611**	**$8,178,845,128**	**$26,746,772,075**

Notes: Sourced from HILDA Wave 22 dataset (A = last 12-month wagerers) and NGTS 2023 dataset (B = monthly wagerers) projected to the Australian adult population 30 June 2023 (ABS, 2024).

Total cost of wagering in Australia, by bearer of cost and PGSI

Table 9 summarises the estimated total cost of wagering in Australia by the bearer of the cost and PGSI category. More than three-quarters of the total cost (77.1%) is borne by the wagerers themselves, followed by 17.5% to affected others, 3.7% to the community and 1.8% to the government.

Table 9: Estimated total cost of wagering in Australia, by bearer of cost and PGSI category, 2023

Bearer of cost		Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Wagerers	Cost	$6,019,802,804	$3,699,023,364	$6,376,670,467	$4,515,166,415	$20,610,663,050

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FOI 27-145- Document 1

Bearer of cost		Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
	% of total	22.5	13.8	23.8	16.9	77.1
Affected others	Cost	$27,671,917	$117,028,504	$1,356,870,230	$3,167,295,469	$4,668,866,120
	% of total	0.1	0.4	5.1	11.8	17.5
Community	Cost	$272,572,032	$126,786,209	$158,825,822	$426,484,693	$984,668,757
	% of total	1.0	0.5	0.6	1.6	3.7
Government	Cost	$250,607,824	$94,902,681	$67,165,093	$69,898,550	$482,574,148
	% of total	0.9	0.4	0.3	0.3	1.8
Total cost of wagering in Australia	**Cost**	**$6,570,654,577**	**$4,037,740,758**	**$7,959,531,611**	**$8,178,845,128**	**$26,746,772,075**
	% of total	**24.6**	**15.1**	**29.8**	**30.6**	**100.0**

Notes: Bearer of cost groups estimated by totalling the following items. Wagerers – direct wagering expenditure, depression, anxiety, other psychological harm, mild alcohol dependence, and experience on alcohol around wagering. Affected others – 50% of bankruptcy cost of unpaid debts and emotional harm to affected others (relationships). Community – 50% of bankruptcy cost of unpaid debts, 50% cost of separation, absenteeism, and reduced work performance. Government – bankruptcy cost of administration and 50% cost of separation.

Cost of wagering in Australia, by cost category and PGSI

Direct wagering expenditure

Yearly wagering expenditure

Table 10 summarises the direct yearly wagering expenditure for wagerers in 2023. The H2 Gambling Capital data projected for 2023 provided the total expenditure for onshore wagering and the HILDA dataset provided the proportions of PGSI status. When projected to the Australian population of wagerers the direct yearly wagering totalled to $7.5 billion in 2023.

Table 10: Direct yearly wagering expenditure by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population wagerers (last 12 months)	1,008,653	315,191	254,027	103,114	1,680,985
% of total yearly wagering expenditure	32.9	19.2	29.3	18.6	100
Yearly wagering expenditure by wagerers	**$2,461,694,609**	**$1,439,315,136**	**$2,191,129,976**	**$1,394,960,278.44**	**$7,487,100,000**

Cost of excessive wagering expenditure

Of the total $7.5 billion in wagering expenditure in 2023, it was estimated that $2.6 billion was attributable to excessive wagering by regular wagerers. Another interpretation is that 35.1% of

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FOI 27-145- Document 1

total wagering expenditure is borne by regular wagerers who are experiencing financial harm, going beyond a purely recreational or entertainment benefit.

Table 11 shows the calculation of excessive wagering expenditure for regular wagerers by PGSI score. The total cost of excessive wagering that results in financial harm is estimated at $1.97 billion. Sixty-eight per cent is attributable to high-risk wagering ($1.8 billion, PGSI ≥8), 31.5% to moderate-risk wagering ($826 million, PGSI = 3–7) and 0.5% to low-risk wagering ($12.3 million, PGSI = 1–2).

Table 11: Calculation and cost of excessive wagering expenditure by PGSI score, 2023

PGSI score	Estimated number ≥monthly wagerers in Australia (*N*)	Average wagering spend per person (S)	Average number of financial harms (H)	Discount weight (W)	Aggregate excessive spend (N^*S_k-S_0^*W)
0	187,912	$4,430.4	0.0	0.0	$0
1	64,443	$4,650.9	0.6	0.93	$13,246,301
2	22,534	$3,098.0	1.0	0.95	$0
3	36,071	$8,409.9	1.4	0.97	$139,257,846
4	35,709	$5,760.1	1.7	0.98	$46,304,300
5	16,682	$38,132.6	2.3	0.98	$551,654,266
6	15,249	$10,102.6	2.6	0.98	$85,037,086
7	11,482	$4,771.8	3.0	0.99	$3,864,825
8	15,716	$8,556.4	3.4	0.99	$64,028,836
9	13,780	$10,183.1	4.0	0.99	$78,419,848
10	4,907	$31,664.0	4.1	0.99	$132,225,674
11	3,839	$10,199.5	4.3	0.99	$21,925,329
12	6,494	$98,863.5	4.2	0.99	$607,012,911
13	3,009	$6,352.4	4.3	0.99	$5,725,071
14	6,897	$74,661.8	4.4	0.99	$479,638,378
15+	12,824	$35,618.9	4.9	0.99	$396,455,635
Total					**$2,624,796,307**

Notes: *Aggregate excessive spend for wagerers PGSI score 2 negative value (-$28,666,53 and treated as $0 excessive spend.

Financial harms

Bankruptcy

Table 12 shows the cost of bankruptcy due to wagering by PGSI category. It is assumed that the cost of administrating bankruptcy is borne by the government and the costs of unpaid debts are to those close to the wagerers (affected others, e.g. family, friends) and the community (e.g. businesses).

A counterfactual discount was applied with the assumption that 5% of 'major worsening in financial situation' in HILDA is due to bankruptcy, scaled to the proportion of Australians experiencing bankruptcy due to wagering. The estimated total cost of bankruptcy due to wagering in Australia was $37.2 million, with 25% of this cost attributable to high-risk wagering and 13.2% to moderate-risk wagering.

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FOI 27-145- Document 1

Table 12: Cost of bankruptcy due to wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population wagerers (last 12 months)	1,008,653	315,191	254,027	103,114	1,680,985
Estimated % who experienced bankruptcy due to wagering (%*n*)	0.06	0.06	0.06	0.30	0.06
Number in Australia who experienced bankruptcy due to wagering (%*n* x *n* x 80%)	446	161	130	246	983
Cost of administrating bankruptcy			$9,630		
Cost of unpaid debts due to bankruptcy debts			$28,152		
Total cost of administrating bankruptcy (government)	$4,297,448	$1,554,445	$1,252,799	$2,365,972	$9,470,664
Total cost of unpaid debts (affected others, the community)	$12,563,008	$4,544,208	$3,662,387	$6,916,599	$27,686,202
Total cost of bankruptcy	**$16,860,457**	**$6,098,652**	**$4,915,186**	**$9,282,571**	**$37,156,866**

Psychological harms

Cost of depression

Table 13 shows the cost of depression by applying the disability weight for mild major depressive disorder to the Statistical Value of Life in a Year (VLY) for 2023, scaled to the proportion of Australians experiencing depression due to wagering. The estimated total cost of depression to wagerers due to wagering in Australia was $2.6 billion, with 21.2% of this cost attributable to high-risk wagering and 18.9% to moderate-risk wagering.

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FOI 27-145- Document 1

Table 13: Cost of depression due to wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population wagerers (last 12 months)	1,008,653	315,191	254,027	103,114	1,680,985
% who experienced depression due to their wagering (%*n*)	4.2	4.6	7.0	19.5	5.6
Number in Australia who experienced depression due to their wagering (%*n* x *n* x 80%)	33,788	11,492	14,317	16,047	75,644
Statistical Value of Life in a Year (VLY) 2023			$235,000		
Disability weight (mean) – mild major depressive disorder			0.145		
Total cost of depression to wagerers	**$1,154,771,878**	**$392,780,650**	**$489,319,579**	**$548,439,922**	**$2,585,312,029**

Cost of anxiety

Table 14 shows the cost of anxiety by applying the disability weight for mild anxiety disorder to the Statistical Value of Life in a Year (VLY) for 2023, scaled to the proportion of Australians experiencing anxiety/stress due to regular wagering. The estimated total cost of anxiety to wagerers due to regular wagering in Australia was $731 million, with 55.9% of this cost attributable to high-risk wagering and 37% to moderate-risk wagering.

Table 14: Cost of anxiety due to regular wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	467,980
% who experienced anxiety/stress due to their wagering (%*n*)	0.7	9.3	42.0	94.0	33.2
Number in Australia who experienced anxiety/stress due to wagering (%*n* x *n* x 80%)	1,052	6,423	38,844	58,753	105,073
Statistical Value of Life in a Year (VLY) 2023			$235,000		
Disability weight (mean) – mild anxiety disorder			0.0296		
Total cost of anxiety to regular wagerers	**$7,320,879**	**$44,684,717**	**$270,237,696**	**$408,745,454**	**$730,988,746**

Cost of other psychological harms

The NGTS 2023 dataset contained other psychological harm items, separate to depression and anxiety. These included survey items around experiencing guilt, regrets and/or mood swings

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FOI 27-145- Document 1

related to their gambling and/or wagering, an increasing tolerance to gambling, or feeling like they might have a problem with gambling.

Table 15 shows the cost of other psychological harms to wagerers by applying the disability weight by PGSI category to the Statistical Value of Life in a Year (VLY) for 2023, scaled to the proportion of Australians experiencing other psychological harms (minus depression and anxiety) due to regular wagering.

As described previously, a dominance analysis with all NGTS 2023 harm domains was conducted to partition out the attributable fraction of other psychological harms to the PGSI disability weights (33.6%). The estimated total cost of other psychological harms due to regular wagering in Australia was $1.6 billion, with 70.6% of this cost attributable to moderate-risk wagering and 22.4% to low-risk wagering.

Table 15: Cost of other psychological harm due to regular wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	467,980
% experienced other psychological harm, minus depression and anxiety (%*n*)	2.8	51.1	53.8	5.2	24.7
Number in Australia experienced other psychological harm due to wagering (%*n* x *n* x 80%)	4,209	35,264	49,785	3,275	92,534
Statistical Value of Life in a Year (VLY) 2023			$235,000		
Disability weight for PGSI category	0	0.13	0.29	0.44	-
Attributable fraction of disability weight from other psychological harm			33.6%		
Total cost of other psychological harm to regular wagerers	**$0**	**$362,058,697**	**$1,140,243,953**	**$113,811,935**	**$1,616,114,585**

Relationship harms

Cost of separation

Table 16 shows the cost of separation by scaling the *State of Separation Impact Report 2023* (The Separation Guide, 2023) cost of separation to the proportion of Australian wagerers who separated due to wagering. The estimated total cost of separation to affected others and the community due to wagering in Australia was $946 million, with 14.3% of this cost attributable to high-risk wagering and 13.9% to moderate-risk wagering.

Table 16: Cost of separation due to wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering

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FOI 27-145- Document 1

Estimated 2023 Australian adult population wagerers (last 12 months)	1,008,653	315,191	254,027	103,114	1,680,985
% who separated due to their wagering (%*n*)	2.8	3.4	3.0	7.6	3.2
Number in Australia who separated due to their wagering (%*n* x *n* x 80%)	22,855	8,662	6,116	6,266	43,899
Cost of separation 2023			$21,554		
Total cost of separation to affected others and the community	**$492,620,752**	**$186,696,474**	**$131,824,588**	**$135,065,156**	**$946,206,969**

Cost of emotional distress to affected others

Regular wagerers in the NGTS 2023 were identified as having experienced harm to their relationships if, due to their gambling and/or wagering, they spent less time with people they cared about, neglected their commitments, had greater conflict in their relationships, experienced relationship problems, had their betting criticised or were told they have a gambling problem.

Table 17 shows the calculations of emotional-distress cost to affected others. The average number of affected others was estimated as a ratio of the wagerers: affected others by PGSI status as per Goodwin and colleagues (2017), with the exclusion of non-risk wagers who, having reported relationship harm, were assumed to affect 0.5 others. The number of affected others was then multiplied by $9,180 cost per person, a proxy cost for emotional distress for 2023.

The total estimated cost of emotional distress to affected others due to regular wagering in 2023 was $4.7 billion, with 68% of this cost attributable to the relationship harm caused by high-risk wagering ($3.2 billion) and 29.1% to moderate-risk wagering ($1.3 billion).

Table 17: Cost of emotional distress to affected others due to regular wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	467,980
% experienced harm to relationships due to their wagering (%*n*)	3.1	18.1	53.2	91.9	38.3
Number in Australia experienced relationship harm due to wagering (%*n* x *n* x 80%)	4,660	12,501	49,203	57,441	123,804
Average number of affected others	0.5	1	3	6	-
Estimated number in Australia of affected others due to wagering	2,330	12,501	147,608	344,645	507,083
Cost of emotional distress per affected other			$9,180		
Total cost of emotional distress to affected others	**$21,390,413**	**$114,756,400**	**$1,355,039,036**	**$3,163,837,169**	**$4,655,023,018**

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FOI 27-145- Document 1

Health harms

Cost of mild alcohol dependence

Table 18 summarises the cost of mild alcohol dependence related to regular wagering in Australia in 2023. Wagerers were considered to have experienced mild alcohol dependence if they met criteria for hazardous drinking on the AUDIT-C (score ≥ 4 for males and ≥ 3 for females; Bush et al., 1998). Only wagerers who also consumed alcohol around wagering were included in the cost calculation, which applied the disability weight for mild alcohol dependence to the Statistical Value of Life in a Year (VLY) for 2023. The estimated total cost of mild alcohol dependence to wagerers due to regular wagering in Australia was $7.4 billion.

Table 18: Cost of mild alcohol dependence around regular wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	467,980
% consumed alcohol around wagering and met criteria for hazardous drinking – mild alcohol dependence (%*n*)	26.9	35.7	39.5	50.4	35.6
Number in Australia experienced mild alcohol dependence and consumed alcohol around wagering (%*n* x *n* x 80%)	40,395	24,670	36,561	31,507	133,132
Statistical Value of Life in a Year (VLY) 2023			$235,000		
Disability weight (mean) – mild alcohol dependence			0.2353		
Total cost of mild alcohol dependence around wagering to regular wagerers	**$2,233,196,449**	**$1,363,883,636**	**$2,021,242,343**	**$1,741,831,084**	**$7,360,153,512**

Financial cost of alcohol expenditure

Table 19 summarises the financial cost of alcohol expenditure around wagering for regular wagerers in 2023. The NGTS 2023 dataset provided the average yearly alcohol expenditure around wagering by PGSI status, when projected to the Australian population of wagerers money spent on alcohol consumed around wagering totalled $254 million in 2023.

Table 19: Financial cost of alcohol expenditure around regular wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	467,980
% consumed alcohol around wagering and reported typical	19.2	25.0	27.6	29.9	24.1

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FOI 27-145- Document 1

alcohol expenditure per session (%*n*)					
Number in Australia consumed alcohol around wagering reporting typical alcohol expenditure (%*n* x *n* x 80%)	28,801	17,289	25,538	18,658	90,286
Average yearly alcohol spend, adjusted for CPI 2023	$1,844	$2,248	$3,411	$4,022	-
Total financial cost of alcohol expenditure around wagering to regular wagerers	**$53,103,002**	**$38,861,325**	**$87,114,184**	**$75,047,651**	**$254,126,162**

Cost of illicit drug use

Table 20 shows the cost associated with wagerers impacted by illicit drugs while gambling. A 50% counterfactual was applied to the population prevalence, assuming that only half would be impacted at a level high enough to be a decrement to their health. The disability weight for other drug use disorder was applied to the Statistical Value of Life in a Year (VLY) for 2023, scaled to the proportion of regular wagerers in Australia (discounted by 50%) impacted by illicit drugs while gambling.

The estimated total cost of illicit drug use to wagerers around regular wagering in Australia was $577 million, with 40.3% of this cost attributable to high-risk wagering and 30.7% to moderate-risk wagering.

Table 20: Cost of illicit drug use around regular wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	467,980
% affected by illicit drugs while gambling (%*n*)	4.3	4.9	11.3	21.9	10.1
Number in Australia affected by illicit drugs while wagering (%*n* x *n* x 50%)	4,040	2,115	6,532	8,555	21,242
Statistical Value of Life in a Year (VLY) 2023			$235,000		
Disability weight (mean) – other drug use disorder			0.1156		
Total cost of illicit drug use around wagering for regular wagerers	**$109,715,986**	**$57,439,203**	**$177,382,736**	**$232,330,091**	**$576,868,016**

Work harms

Cost of absenteeism

Table 21 summarises the cost of absenteeism by PGSI status due to regular wagering in 2023. The prevalence of absenteeism among regular wagerers was estimated from the NGTS 2023 dataset figures on reduced work performance by applying the % difference from prevalence figures report by Li and colleagues (2017, Table 4, page 235) between absenteeism (Absent variable) and reduced work performance (Red.Perf. variable) for each PGSI category.

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FOI 27-145- Document 1

It was assumed that the average estimated days a year absent due to wagering was 15 days. The total estimated cost of absenteeism due to regular wagering to the community (i.e. employers) in Australia was $272 million, with 76.7% of the cost attributable to high-risk wagering ($209 million).

Table 21: Cost of absenteeism due to regular wagering by PGSI category, 2023

Variable	Non-risk wagerers (PGSI = 0)	Low-risk wagerers (PGSI = 1–2)	Moderate-risk wagerers (PGSI = 3–7)	High-risk wagerers (PGSI ≥ 8)	Total wagerers
Estimated 2023 Australian adult population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	467,980
% estimated absent from work due to wagering (%*n*)	0.4	1.7	2.8	22.7	4.9
Number in Australia absent from work due to wagering (%*n* x *n* x 80%)	529	1,148	2,621	14,188	18,486
Total cost per absent day			$982		
Estimated average days a year absent due to wagering			15		
Total cost of absenteeism per year due to wagering to the community			$14,735		
Total cost of absenteeism due to wagering to the community	**$7,797,133**	**$16,918,614**	**$38,615,552**	**$209,057,339**	**$272,388,638**

Cost of reduced work performance

Table 22 summarises the cost of reduced work performance by PGSI status due to regular wagering in 2023. Reduced performance was assumed to be half of a full-time working day (half cost of an absent day), and with the average estimated reduced work performance days a year due to wagering equalling 15 days.

The total estimated cost of reduced work performance to the community (i.e. employers) due to regular wagering in Australia was $225 million, with 65% of the cost attributable to high-risk wagering ($146 million) and 23.3% to moderate-risk wagering ($52 million).

Table 22: Cost of reduced work performance due to regular wagering by PGSI category, 2023

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated 2023 Australian adult population ≥ monthly wagerers (*n*)	187,912	86,331	115,608	78,129	467,980
% experienced reduced performance at work/study due to wagering (%*n*)	1.1	2.8	7.7	31.8	8.2
Number in Australia experienced reduced performance at work/study due to wagering (%*n* x *n* x 80%)	1,654	1,934	7,121	19,876	30,585
Total cost per day of reduced work performance			$491		

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FOI 27-145- Document 1

Variable	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Estimated average days reduced performance at work due to wagering			15		
Total cost of reduced work performance to the community per year due to wagering			$7,367		
Total cost of reduced work performance due to wagering to the community	**$12,183,020**	**$14,247,254**	**$52,466,783**	**$146,436,477**	**$225,333,533**

The benefit of a wagering advertising ban in Australia

Table 23 provides the benefit (reduction) estimates for each PGSI category that would result from a wagering advertising ban that involves:

- a complete ban (100% reduction) on online advertisements, including social media
- 28% reduction in TV advertisements, including streaming
- 25% reduction in radio advertisements
- 80% reduction in advertisements through betting affiliates.

Overall, the net benefit across all items was $117.6 million. These estimates reflect the benefit attributed to the partial wagering advertisement ban and the impact it has on reductions of harmed wagerers within each at-risk PGSI group. The moderate-risk and high-risk wagering groups show negative values (values in pink), which represent these categories having a lower number of harmed people after the ban relative to before the ban.

Non-risk and low-risk wagering groups show positive values (values in black), which represents these categories having a higher number of people after the ban relative to before the ban. For example, it can be expected that moderate-risk and high-risk wagering groups show negative dollar values, which represent these categories having a lower number of people experiencing wagering related harms after the ban relative to before the ban. On the other hand, non-risk and low-risk groups may show positive dollar values, which represent these categories having a higher number of people after the ban relative to before the ban.

It is important to keep in mind that positive dollar values in the non-risk and low-risk categories do not mean that the partial ban is adding to the cost attributable to the non-risk and low-risk wagerers. The increase in the non-risk and low-risk wagerers costs is a result of the movement of the moderate-risk and high-risk wagerers into these lower-risk groups. These inflows from higher risk categories to lower risk categories result in reduced overall costs relative to before the ban.

Overall, one-third of the benefit of a wagering advertising ban was the emotional cost of relationship harm to affected others (33.2%), followed by direct wagering expenditure (loss) to wagerers (32.4%), the cost of depression to wagerers (12.2%), and the cost of mild alcohol dependence to wagerers (8.1%). Proportionate to the total, all other benefits per harm item were below 10%.

Table 23 also presents the post-ban average reduction in the predicted number of days an individual wagered in the past year due to the reduction in wagering advertising exposure

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variables. This value is calculated by subtracting the post-ban predicted number of days an individual wagered estimated from Equation (3) from the pre-ban value estimated from Equation (3), which is then averaged across all participants in the CAS dataset.

Note that because the HILDA and NGTS datasets did not contain information about the number of days an individual was exposed to wagering advertising, these reduction estimates were not generalised to the wagerer and regular wagerer populations. Instead, the reduction in the predicted number of days an individual wagered is based on the CAS data sample.

Table 23: Total benefits of a ban on wagering advertising in Australia, by PGSI category, 2023

Cost item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Post-ban average reduction in number of days wagering per year	4	5	6	6	5
Post-ban change in PGSI category in 2023 Australian adult wagerer population (last 12 months) (A)	2,975	756	-336	-3,396	0
Post-ban change in PGSI category in 2023 Australian adult regular wagerer population (≥ monthly) (B)	828	211	-94	-945	0
Direct wagering expenditure					
Yearly wagering expenditure (A)	$7,261,553	$3,454,287	-$2,899,894	-$45,936,660	-$38,120,714
Financial harm					
Bankruptcy – admin (A)	$12,677	$3,731	-$1,658	-$77,913	-$63,163
Bankruptcy – unpaid debts (A)	$37,059	$10,906	-$4,847	-$227,767	-$184,649
Total financial benefit (bankruptcy)	**$49,735**	**$14,636**	**-$6,505**	**-$305,679**	**-$247,813**
Psychological harm					
Depression (emotional distress to wagerer) (A)	$3,406,368	$942,655	-$647,600	-$18,060,370	-$14,358,947
Anxiety (emotional distress to wagerer) (B)	$32,271	$109,002	-$218,785	-$4,945,575	-$5,023,088
Other psychological harm (B)	$0	$883,188	-$923,142	-$1,377,056	-$1,417,011
Total psychological benefit	**$3,438,638**	**$1,934,844**	**-$1,789,527**	**-$24,383,001**	**-$20,799,045**
Relationship harm					
Separation (A)	$1,453,142	$448,063	-$174,466	-$4,447,755	-$2,721,017
Emotional costs to affected others (B)	$94,290	$279,931	-$1,097,041	-$38,280,536	-$39,003,356
Total relationship benefit	**$1,547,432**	**$727,994**	**-$1,271,507**	**-$42,728,291**	**-$41,724,372**
Health harm					
Mild alcohol dependence (B)	$9,844,023	$3,326,989	-$1,636,400	-$21,075,113	-$9,540,501
Expenditure on alcohol around wagering (B)	$234,080	$94,796	-$70,528	-$908,032	-$649,683
Drug use disorder (B)	$483,633	$140,114	-$143,609	-$2,811,055	-$2,330,917
Total health benefit	**$10,561,735**	**$3,561,900**	**-$1,850,536**	**-$24,794,200**	**-$12,521,101**
Work harm					
Absenteeism (B)	$34,370	$41,270	-$31,263	-$2,529,469	-$2,485,091
Reduced work performance (B)	$53,703	$34,754	-$42,477	-$1,771,794	-$1,725,814

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FOI 27-145- Document 1

Cost item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Total work benefit	**$88,073**	**$76,024**	**-$73,740**	**-$4,301,262**	**-$4,210,905**
Total benefit of wagering advertising ban in Australia	**$22,947,167**	**$9,769,685**	**-$7,891,709**	**-$142,449,094**	**-$117,623,951**

Notes: Sourced from HILDA Wave 22 dataset (A = last 12-month wagerers) and NGTS 2023 dataset (B = monthly wagerers) projected to the Australian adult population 30 June 2023 (ABS, 2024). Black values represent an increase in costs for a specific PGSI category after the wagering advertising ban. Pink values represent a decrease in costs and therefore a benefit.

Table 24 below summarises as a proportion of at-risk group (PGSI category), the bearer of the benefits of a partial wagering advertising ban in Australia. Across all at-risk groups the wagerers themselves have the greatest benefit (60.7%) but this decreases as at-risk wagering increases. Of the benefit attributable to high-risk wagering, 27% of the benefit is to affected others.

Table 24: Total benefits of a ban on wagering advertising in Australia, by bearer of the cost within PGSI category, 2023

Bearer of benefit		Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Wagerers	Benefit	$21,261,926	$8,951,031	-$6,539,957	-$95,113,861	-$71,440,861
	% at-risk group	92.7	91.6	82.9	66.8	60.7
Affected others	Benefit	$112,819	$285,384	-$1,099,464	-$38,394,419	-$39,095,680
	% at-risk group	0.5	2.9	13.9	27.0	33.2
Community	Benefit	$833,174	$305,509	-$163,397	-$6,639,023	-$5,663,738
	% at-risk group	3.6	3.1	2.1	4.7	4.8
Government	Benefit	$739,248	$227,762	-$88,891	-$2,301,790	-$1,423,672
	% at-risk group	3.2	2.3	1.1	1.6	1.2
Total benefit of wagering advertising ban in Australia	**Benefit**	**$22,947,167**	**$9,769,685**	**-$7,891,709**	**-$142,449,094**	**-$117,623,951**

Notes: Bearer of benefit groups estimated by totalling the following items. Wagerers – direct wagering expenditure, depression, anxiety, other psychological harm, mild alcohol dependence, and experience on alcohol around wagering. Affected others – 50% of bankruptcy cost of unpaid debts and emotional harm to affected others (relationships). Community – 50% of bankruptcy cost of unpaid debts, 50% cost of separation, absenteeism, and reduced work performance. Government – bankruptcy cost of administration and 50% cost of separation.

Alternative scenario benefit estimates provided for a greater reduction of 49% in TV and streaming wagering advertising, which resulted in increased benefit of $182.2 million. A complete ban on the majority of wagering advertising (excluding direct messages) had an estimated benefit of $332.1 million. For the full details of the 2 alternative scenario estimates see Appendix D.

Discussion

Previous research has shown that many Australians believe there is currently too much wagering advertising (AGRC, 2023a, 2023b). Wagering advertisements have been shown to

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FOI 27-145- Document 1

increase betting frequency and bet size and foster more positive attitudes towards gambling (Bouguettaya et al., 2020; Browne et al., 2019; Hing et al., 2015, 2019).

This increase in wagering can lead to financial, health, relationship, psychological, cultural, educational, occupational and crime related harm. Given this evidence, it is reasonable to assume that reducing wagering advertising will lead to a reduction in wagering spending and harm, which may generate a socio-economic benefit for Australian.

Based on their parliamentary inquiry findings on the harm associated with online gambling, the House of Representatives Standing Committee on Social Policy and Legal Affairs (SPLA) recommended a 4-staged ban for wagering advertising (SPLA, 2023). The aim of this research was to analyse available data to estimate the potential socio-economic benefit of a partial ban on wagering advertising in Australia, which included benefits to wagerers, affected others, the community and government.

In total, an estimated socio-economic benefit of $117.6 million in 2023 was estimated for a partial ban in wagering advertising. This wagering advertising ban assumed a 100% reduction through online and social media advertising, 28% reduction in TV advertisements including streaming, 25% reduction in radio advertisements and an 80% reduction in advertisements through betting affiliates.

Overall, the largest benefit of this proposed wagering advertising ban was to wagerers themselves (60.7%) followed by affected others (33.2%). By individual items, one-third of the benefit was the emotional cost due to relationship harm to affected others (33.2%), followed by direct wagering expenditure (loss) to wagerers (32.4%), the cost of depression to wagerers (12.2%), and the cost of mild alcohol dependence to wagerers (8.1%).

The current findings are consistent with research showing that wagering advertisements can increase betting frequency and spending by 56%–95% (Browne et al., 2019). Under the proposed partial ban, we estimated that, on average, wagering would be annually reduced by 5 days per wagerer (8.7%).

To the authors' knowledge, all previous socio-economic costings of gambling to Australia have focused on the **overall** cost of gambling and have not estimated the impact that an implementation of measures would have on reducing gambling-related harm.

This highlights the importance of the current study in specifically estimating the cost of wagering spend loss and harm in Australia, and the benefit that the proposed reductions to wagering advertising would have on reducing harm.

The *You Win Some, You Lose More* parliamentary inquiry report (SPLA, 2023) provided a wide range of evidence that supports their recommendation to gradually ban wagering advertising – and the ban aligns with public sentiment. The current report provides further evidence that the proposed reduction in wagering advertising, which reflects elements of the proposed SPLA recommendations under Phases 1 and 2, could mitigate some harmful effects associated with wagering.

Furthermore, alternative scenario estimates reflecting latter phases of a wagering advertising ban show evidence of a greater reduction in harm with an increased benefit of $182.2 million by further restricting through television and $332.1 million for a complete ban on all platforms (excluding direct messages through WSPs).

The findings suggest this proposed reduction in wagering could inform part of a phased approach by the Australian Government, in collaboration with the states and territories, which eventually may lead to a ban on all wagering advertising in Australia. The extent to which the

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FOI 27-145- Document 1

proposed reduction in wagering advertising is sufficient to mitigate harmful effects should be subject to monitoring and evaluation, including (based on international experience) monitoring of the wagering industry's strategies to navigate the ban (e.g. increase in direct messaging) to inform need for further adjustments of the phased approach.

Limitations

The current estimate of the benefits of a wagering advertising ban is likely to be an underestimate due to several limitations in available data. The data sources used for analysis (HILDA, NGTS, CAS and H2 Gambling Capital data) have different populations and sampling methods. This can introduce heterogeneity in the characteristics of the population being generalised.

For example, in the HILDA Wave 22 dataset, the prevalence of last 12-month wagering is approximately 8%. This may be an underestimate of the prevalence of wagering in comparison to a 2019 Australian national gambling prevalence study, with a sample of 15,000 Australian adults' representative of the population, which found the prevalence of sports and race betting were 16.8% and 9.6% respectively (Hing et al., 2021).

In this study, given the proportions in PGSI categories were based on HILDA for all analyses, the cost of wagering and the socio-economic benefits from a wagering advertising ban may be underestimated. HILDA is thought to be 'representative' of the Australian population but there has been only one top-up sample since 2001, in 2011, to account for the representativeness of recent migrants. Considering the attrition over 20 years, the prevalence of any outcomes needs to be treated with caution.

This study only reported the short-term and annual cost of wagering and cost saving (benefits) of the proposed partial ban on wagering advertisements. However, it is important to highlight that gambling-related harm has a legacy impact that continues well after gambling has ceased (e.g. 4–5 years: Rockloff et al., 2022). Furthermore, such a wagering advertising ban may have longer lasting impacts.

Due to the limitations of data, many socio-economic costs associated with wagering were unable to be estimated, such as: crime (legal costs, cost to business), costs of job loss and job change, productivity loss for study (unable to complete a degree for example), emotional costs after separation, suicide (ideation, attempt, completion), debt prior to bankruptcy, loss of assets, physical health (e.g. loss of sleep), tobacco use, IPV and domestic violence, the cost to the health system, and the cost to governments at all levels (e.g. justice system).

The reported benefits were only modelled to estimate how the wagering advertising ban would change the distribution of individuals across PGSI categories. It is possible that the wagering advertising ban would reduce the total number of wagerers over time but this was not modelled due to the information contained in the data assets (i.e. cross-sectional data assets). To model such impacts, a longitudinal study will be required. The results are also dependent on the validity and reliability of the PGSI scale, both of which have been demonstrated in large samples of participants (Currie et al., 2013).

Future directions

This report provides evidence that the proposed reduction in wagering advertising by DITRDCA could mitigate some harmful effects associated with wagering and generate a socio-economic benefit in Australia. Furthermore, this report provides evidence that further reductions in wagering advertising generate larger decreases in wagering, wagering spend and harm, and an

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FOI 27-145- Document 1

increase in socio-economic benefits. The findings could help inform the Australian Government on the approach taken in phasing in a reduction in wagering advertising in Australia.

Based on the findings, the government should consider a total ban on wagering advertising in Australia. Moreover, the proposed plan ruled out restricting wagering advertising through direct messaging. In regression models, direct messaging was a significant and strong predictor in wagering participation. Future work could simulate a scenario where direct messaging is also banned. Banning wagering advertising through direct messages would be more likely to significantly reduce harm associated with wagering.

One way to address the issue of using a representative sample to consistently estimate the socio-economic costs of wagering in the future is to conduct an Australian gambling prevalence study with reliable estimates of harm outcomes for wagerers (and gamblers), along with the impact of wagering advertising by medium (e.g. TV, online, etc.) and type (e.g. promotion/inducement, product placement, sponsorship, etc.).

In addition to an Australian gambling prevalence study, access to Wagering Service Provider (WSP) data could generate more accurate and better estimates. The WSP data contains the detailed information on how and how much their customers wager (e.g. betting frequency, bet type, amount bet). The WSP data could be also linked to administrative data so that the cost of wagering to the health system, employment and suicide (via death records) could be estimated.

Beyond the short-term analysis conducted here, a longer-term analysis would be able to determine the full extent of the socio-economic benefits of the proposed wagering advertising ban.

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Appendices

Appendix A: Problem Gambling Severity Index (PGSI) instrument

Thinking about the last 12 months…

PGSI item	Never	Sometimes	Most of the time	Almost always
1. Have you bet more than you could really afford to lose?	0	1	2	3
2. Have you needed to gamble with larger amounts of money to get the same feeling of excitement?	0	1	2	3
3. When you gambled, did you go back another day to try to win back the money you lost?	0	1	2	3
4. Have you borrowed money or sold anything to get money to gamble?	0	1	2	3
5. Have you felt that you might have a problem with gambling?	0	1	2	3
6. Has gambling caused you any health problems, including stress or anxiety?	0	1	2	3
7. Have people criticised your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?	0	1	2	3
8. Has your gambling caused any financial problems for you or your household?	0	1	2	3
9. Have you felt guilty about the way you gamble or what happens when you gamble?	0	1	2	3

Total scoring:

- 0: non-problem gambling
- 1–2: low-risk gambling
- 3–7: moderate-risk gambling
- 8 or more: problem gambling

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Appendix B: Socio-economic benefit calculation depression example

To apply the changes in numbers in each of the PGSI categories due to the advertising ban, the total cost of depression due to wagering was first estimated. HILDA included the Short-Form Health Survey (SF-36) to assess mental health (RAND Corporation, 2024). The SF-36 can be used to screen for depressive disorders where a threshold of ≤40 has a 92.3% sensitivity and 70.2% specificity for detecting depression, correctly classifying 76.3% of patients (Matcham et al., 2016). Using this threshold, individuals in the HILDA population are then categorised in to depressed and not depressed, which were then used to calculate the prevalence in depression across PGSI categories.

By substituting values related to depression into the general costing equation $Total\ Cost = A \times B \times C \times D$ (*1*) the following is calculated:

$$\text{Total cost of depression due to wagering} =$$

$$(\text{Total Wagerers} \times \text{Prevelance of depression}) \times \text{Counterfactual discount} \times \text{Value of Statistical Life Year} \times \text{Disability weight}$$

The socio-economic benefit calculation also uses equation $Total\ Cost = A \times B \times C \times D$ (*1*). For example, for high-risk wagerers the calculation would instead use 'change in high-risk gamblers' instead of 'total wagerers'. Moreover, the prevalence of depression will be for high-risk wagerers instead of total wagerers and these data are contained in HILDA. Therefore, the socio-economic benefit specific to high-risk gamblers can be calculated as:

$$\text{Socio Economic Benefit High Risk Gamblers} =$$

$$(\text{Change in High Risk Gamblers} \times \text{Prevelance of depression}) \times \text{Counterfactual discount} \times \text{Value of Statistical Life Year} \times \text{Disability weight}$$

The same calculation can then be applied to the non-risk, low-risk and moderate-risk groups. The socio-economic benefit estimates reflect the increase or decrease in cost attributed to the partial wagering advertisement ban. By calculating the benefit for non-risk, low-risk, moderate-risk and high-risk groups separately, the impact the wagering advertising ban would have as attributable to at-risk wagering group was quantified.

For example, it can be expected that moderate-risk and high-risk wagering group show negative dollar values, which represents these categories having a lower number of people experiencing wagering related harms after the ban relative to before the ban. On the other hand, non-risk and low-risk groups may show positive dollar values, which represents these categories having a higher number of people after the ban relative to before the ban.

It is important to keep in mind that positive dollar values in the non-risk and low-risk categories do not mean that the partial ban is adding to the cost attributable to the non-risk and low-risk wagerers. The increase in the non-risk and low-risk wagerers costs is a result of the movement of the moderate-risk and high-risk wagerers into these lower-risk groups. These inflows from higher risk categories to lower risk categories result in reduced overall costs relative to before the ban. Once socio-economic benefit values have been calculated for each PGSI category, the sum across all categories can be interpreted as the net benefit to depression related costs attributed to the partial ban in wagering advertising.

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Appendix C: Survey questionnaires (selected items)

Community Attitudes Study (CAS) data – Selected items

In this section we would like to ask where you may have seen advertising for sports and/or race betting, and how often.

[Ask all, single response (set)].

E1. Thinking about the past 12 months, how often did you see or hear sports or race betting advertising in the following places?

	Not in the past 12 months	Once or twice a year	A few times a year	About once a month	2 to 3 times a month	About once a week	2 to 3 times a week	4 or more times a week
Code	0	1	2	3	4	5	6	7
Television								
Streamed content *(e.g. Kayo, SBS on Demand)*								
Radio								
Print media *(e.g. newspapers, magazines)*								
Outdoor signage *(e.g. stadiums, billboards)*								
Team/player uniforms or merchandise								
Social media *(e.g. Facebook)*								
Online *(e.g. news websites, YouTube, podcasts)*								
Direct messages *(e.g. email, SMS)*								
Betting affiliates *(i.e. through paid third-party publishers/bloggers/tipsters)*								

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F1. Thinking about the past 12 months, how often did you spend money on the following gambling activities?

This includes gambling online (e.g. via smartphone, on a laptop), at land-based venues (e.g. TAB, casino), or via telephone calls.

	Not in the past 12 months	Once or twice a year	A few times a year	About once a month	2 to 3 times a month	About once a week	2 to 3 times a week	4 or more times a week
Code	0	1	2	3	4	5	6	7
[F1a] Sports betting *(e.g. AFL, NRL, soccer, basketball, cricket, motorsports, etc.)*								
[F1b] Horse race betting								
[F1c] Greyhound race betting								
[F1d] Harness race/trots betting								
[F1e] Lotteries or scratchies								
[F1f] Keno or bingo								
[F1g] Poker machines *(pokies)*								
[F1h] Casino table games *(e.g. blackjack or roulette, poker)*								
[F1i] Online casino games								
[F1j] eSports *(professional video game competitions such as League of Legends, CSGO, Fortnite)*								
[F1k] Fantasy sports *(e.g. entering a paid competition based on virtual sports teams or events)*								
[F1l] Novelty betting *(e.g. politics, events)*								
[F1m] Virtual sports *(e.g. virtual motor racing, virtual horse racing)*								

[Ask if F1>0, multiple response]

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The Household, Income and Labour Dynamics in Australia (HILDA) – Selected items

Gambling participation/expenditure

In a typical month, roughly how much do you spend on the following activities? This includes money spent online (on a computer, mobile/smart phone, iPad, etc.). If you are unsure, please make your best guess.

		Any expenditure in a typical month?			HOW MUCH PER MONTH? (on average)
		No	Yes		
a	Instant scratch tickets ('scratchies')			→	$
b	Bingo			→	$
c	Lotto or lottery games, like Powerball or Oz Lotto			→	$
d	Keno			→	$
e	Private betting (e.g. playing cards or mah-jong with friends and family)			→	$
f	Poker			→	$
g	Casino table games (e.g. blackjack, roulette)			→	$
h	Poker machines ('pokies') or slot machines			→	$
i	Betting on horse or dog races (but not sweeps)			→	$
j	Betting on sports			→	$

SF-36 (mental health)

These questions are about how you feel and how things have been with you during the past 4 weeks. For each question, please give the one answer that comes closest to the way you have been feeling. How much of the time during the past 4 weeks:

		All of the time	Most of the time	A good bit of the time	Some of the time	A little of the time	None of the time
a	Did you feel full of pep?	1	2	3	4	5	6
b	Have you been a very nervous person?	1	2	3	4	5	6
c	Have you felt so down in the dumps that nothing could cheer you up?	1	2	3	4	5	6
d	Have you felt calm and peaceful?	1	2	3	4	5	6
e	Did you have a lot of energy?	1	2	3	4	5	6

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f	Have you felt downhearted and blue?	1	2	3	4	5	6
g	Did you feel worn out?	1	2	3	4	5	6
h	Have you been a happy person?	1	2	3	4	5	6
i	Did you feel tired?	1	2	3	4	5	6

Separation and major worsening in finance in the past 12 months

We now would like you to think about major events that have happened in your life over the past 12 months. For each statement cross either the YES box or the NO box to indicate whether each event happened during the past 12 months. If you answer 'YES', then also cross one box to indicate how long ago the event happened or started:

Did any of these happen to you in the past 12 months?			If 'YES' indicate how many months ago it happened			
	Yes	No	0–3 months ago	4–6 months ago	7–9 months ago	10–12 months ago
Separated from spouse or long-term partner						
Major worsening in financial situation (e.g. went bankrupt)						

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National Gambling Trends Study data – Selected items

B1. **Thinking about the past 12 months**, how often did you **spend money** on the following **gambling** activities? This includes gambling online, at land-based venues, or via telephone calls.

Gambling activity	Not in the past 12 months	Once or twice a year	A few times a year	Once a month	2 to 3 times a month	Once a week or more often
Code	0	1	2	3	4	5
[B1a] Sports events, e.g. AFL, NRL, Soccer, basketball, cricket, motorsports, etc.						
[B1b] Horse racing						
[B1c] Greyhound racing						
[B1d] Harness racing						
[B1e] Poker machines or pokies						
[B1f] Casino table games, e.g. blackjack or roulette, but not poker						
[B1g] Poker						
[B1h] Keno						
[B1i] Lotto or lottery games, like Powerball or Oz Lotto						
[B1j] Instant scratch tickets (scratchies)						
[B1k] Bingo						
[B1l] Betting on fantasy sports, e.g. entering a paid competition based on virtual sports teams or events						
[B1m] Betting on esports (professional video game competitions such as League of Legends, CSGO, Fortnite)						
[B1n] Betting on virtual sports, e.g. virtual motor racing, virtual horse racing						
[B1p] Betting on novelty events, e.g. current affairs, TV shows, daily weather markets, etc.						

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F3. Have you experienced any of these issues as a result of your gambling in the **last 12 months?** (Select all that apply) {RANDOMISE}

	Select	Domain (hidden)
Spent less time with people you care about	0/1	Relationships
Had regrets that made you feel sorry about your gambling	0/1	Emotional/ psychological
Increased credit card debt	0/1	Financial
Had less spending on recreational expenses such as eating out, going to movies or other entertainment	0/1	Financial
Increased my consumption of alcohol	0/1	Health
Increased experience of depression	0/1	Health
Loss of sleep due to stress or worry about gambling or gambling-related problems	0/1	Health
Experienced greater conflict in my relationships (arguing, fighting, ultimatums)	0/1	Relationships
Used my work or study time to gamble	0/1	Work/study
Reduced performance at work or study (i.e. due to tiredness or distraction)	0/1	Work/study
None of the above [exclusive response]	0/1	

B7. When you spent money on these activities in the **past 12 months**, roughly how much money did you spend on each activity in a **typical day (excluding winnings)**? *(Enter Amount in Australian dollars. Amount for each gambling activity must be between $1 and $99,999.)*

Gambling activity	Amount Australian dollars ($AUD) per day:
Sports events, e.g. AFL, NRL, Soccer, basketball, cricket, motorsports, etc.	
Horse racing	
Greyhound racing	
Harness racing	
Poker machines or pokies	
Casino table games, e.g. blackjack or roulette, but not poker	
Poker	
Keno	
Lotto or lottery games, like Powerball or Oz Lotto	
Instant scratch tickets (scratchies)	
Bingo	
Betting on fantasy sports, e.g. entering a paid competition based on virtual sports teams or events	
Betting on esports (professional video game competitions such as League of Legends, CSGO, Fortnite)	
Betting on virtual sports, e.g. virtual motor racing, virtual horse racing	
Betting on novelty events, e.g. current affairs, TV shows, daily weather markets etc	

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B9. **In the past 12 months**, what payment methods have you used to gamble on each of the below gambling activities? (Select all that apply)

	B9a. Gambling on poker machines or pokies **in a venue**	B9b. Gambling **online** on sports or races
Cash		
Debit card		
Credit card		
Cash advance by credit card		
Buy now pay later (e.g. Afterpay, Zip Pay)		
Cryptocurrency (e.g. Bitcoin)		
Other (please specify)		
Cash		

B20. **In the past 12 months**, what **motivated** you to **bet online on sports and/or racing**? (Select all that apply)

	Select
I enjoy a punt	0/1
I have a lot of experience/knowledge of sports and/or racing	0/1
Having a bet makes watching sports/racing more interesting	0/1
Betting is a social activity for me	0/1
The adrenaline rush	0/1
To feel part of the atmosphere of a big sport/race event	0/1
To make money/get ahead financially	0/1
To chase losses/win back money lost	0/1
I bet when I drink alcohol	0/1
I bet when I use drugs	0/1
Boredom	0/1
Loneliness	0/1
To relax	0/1
To escape from my responsibilities	0/1
To forget my worries	0/1
Easy (24-hour) access to betting	0/1
Betting advertisements	0/1
Betting promotions	0/1
Other (specify)	0/1

[AUDIT C alcohol scale C1 to C4]

We are now going to ask you questions about your consumption of alcohol and tobacco. When we ask about a 'drink' of alcohol we mean a standard drink. A standard drink could be a small glass of wine, a 285ml glass of regular beer, a nip of spirits, or a mixed drink or similar.

C1. How often do you have a drink containing alcohol? (select one response only)

	Code
Never	0
Monthly or less	1
2 to 4 times a month	2
2 to 3 times a week	3
4 or more times a week	4

[Ask if C1 = 2; single response]
C2. You said that you drink alcohol 2 to 4 times a month. Was that: (Select one response only)

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	Code
Weekly	0
Less than weekly	2

[Ask if C1 = 1 to 4; single response]

C3. How many drinks containing alcohol do you have on a typical day when you are drinking? (Select one response only)

A 'drink' of alcohol means a standard drink of alcohol. A standard drink could be a small glass of wine, a 285ml glass of regular beer, a nip of spirits, or a mixed drink or similar.

	Code
1 to 2 drinks	0
3 to 4 drinks	1
5 to 6 drinks	2
7 to 9 drinks	3
10 drinks or more	4

[Ask if C1 = 1 to 4; single response]

C4. How often do you have 6 or more drinks on one occasion? (Select one response only)

	Code
Never	0
Less than monthly	1
Monthly	2
Weekly	3
Daily or almost daily	4

C8. In the past 12 months were you affected by any illicit drugs while gambling? (select one response only)

	Code
No	0
Yes	1
Prefer not to say	99

The next questions are about any help that you may have sought in relation to your gambling.

G1. In the **past 12 months**, have you sought any help for your gambling? (select one response)

	Code
Yes	1
No, I wanted to seek help but didn't	2
No, I didn't need help	0
Prefer not to say	99

[Ask if G1 = yes, code 1; multiple response, randomise]

G2. What prompted you to seek help for your gambling? (select all that apply)

	Select
Financial problems	0/1
Work or study problems	0/1
Relationship problems	0/1
Health problems	0/1
Legal problems	0/1
Someone urged me to	0/1

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Other (specify)	0/1

Q13. Was this a **typical amount of money** for you to spend when you bet online on sports/racing?

	Code
No, I spent a lot more money than usual	1
No, I spent a little more money than usual	2
Yes, this was typical	3
No, I spent a little less money than usual	4
No, I spent a lot less money than usual	5

We are now going to ask some questions about your consumption of alcohol and tobacco during your most recent session of online betting.

Q18. Still thinking of your most recent session of online sports/race betting, did you consume any alcohol that day? (if yes, select all that apply)

	Code
Yes, I drank alcohol before betting	1
Yes, I drank alcohol while betting	2
Yes, I drank alcohol after betting	3
No [Exclusive]	0
Prefer not to say [Exclusive]	99

[Ask all online sport/race bettors who drank alcohol in their last online betting session, codes 1–3 at Q18] [Quantity: min 1, max 1,000]

*Q20. Roughly how much money did you spend on alcohol **that you consumed** that day? (Amount entered must be between $1 and $1,000.)*

	Code
Amount spent on alcohol (in Australian dollars):	
Can't say/can't recall	9999

Q24. Thinking of your most recent session where you bet online on sports/racing, did you make any decisions that you later regretted? (select all that apply)

	Select
Spent too much time betting	0/1
Spent too much money betting	0/1
Bet on impulse	0/1
Bet on things I normally wouldn't bet on	0/1
Neglected other commitments because I was betting	0/1
Behaved in ways I normally wouldn't have because of my betting (e.g. with friends and family)	0/1
Drank too much alcohol	0/1
Other (specify)	0/1
None – I did not make any decisions while betting that day I later regretted [exclusive]	0/1
Don't know/prefer not to say [exclusive]	0/1

Q25. Did your online betting on sports/racing that day have any negative impacts on you in the days following? (select all that apply)

	Select

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Lacked motivation	0/1
Felt depressed	0/1
Felt anxious	0/1
Felt guilty	0/1
Experienced mood swings	0/1
Experienced sleeping problems	0/1
Experienced social/relationship problems	0/1
Experienced work/study problems	0/1
Experienced financial problems	0/1
Experienced legal/police problems	0/1
Other (specify)	0/1
None – my betting that day did not negatively impact me [exclusive]	0/1
Don't know/prefer not to say [exclusive]	0/1

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Appendix D: Alternative scenario estimates for wagering advertising bans

Two alternative scenarios of a wagering advertising ban were estimated. The proposed alternative options were provided by the research funder DITRDCA and are aimed at informing future iterations of the wagering advertising ban as the phased approach is rolled out.

Alternative scenario A is outlined in Table 25 below, and shows the benefits of a partial wagering advertising ban with the following reductions:

- complete ban (100% reduction) on online advertisements, including social media
- 49% reduction in TV advertisements, including streaming
- 23% reduction in radio advertisements
- 80% reduction in advertisements through betting affiliates.

The total benefit of alternative scenario A for a wagering advertising ban was $182.2 million.

Table 25: Alternative scenario A total benefits of a ban on wagering advertising in Australia, by PGSI category, 2023

Cost item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Post-ban average reduction in number of days wagering per year	7	8	9	8	8
Post-ban change in PGSI category in 2023 Australian adult wagerer population (last 12 months) (A)	5,043	1,681	-1,681	-5,043	0
Post-ban change in PGSI category in 2023 Australian adult regular wagerer population (≥ monthly) (B)	1,404	468	-468	-1,404	0
Direct wagering expenditure					
Yearly wagering expenditure (A)	$12,307,716	$7,676,194	-$14,499,469	-$68,222,762	-$62,738,321
Financial harm					
Bankruptcy – admin (A)	$21,486	$8,290	-$8,290	-$115,712	-$94,226
Bankruptcy – unpaid debts (A)	$62,811	$24,235	-$24,235	-$338,267	-$275,456
Total financial benefit (bankruptcy)	**$84,297**	**$32,525**	**-$32,525**	**-$453,979**	**-$369,682**
Psychological harm					
Depression (emotional distress to wagerer) (A)	$5,773,504	$2,094,788	-$3,237,998	-$26,822,331	-$22,192,036
Anxiety (emotional distress to wagerer) (B)	$32,271	$109,002	-$218,785	-$4,945,575	-$5,023,088
Other psychological harm (B)	$0	$765,429	-$2,215,542	-$2,024,682	-$3,474,794
Total psychological benefit	**$5,805,775**	**$2,969,219**	**-$5,672,324**	**-$33,792,588**	**-$30,689,918**
Relationship harm					
Separation (A)	$2,462,952	$995,695	-$872,329	-$6,605,577	-$4,019,260
Emotional costs to affected others (B)	$163,010	$242,607	-$2,632,898	-$56,283,758	-$58,511,039
Total relationship benefit	**$2,625,962**	**$1,238,301**	**-$3,505,227**	**-$62,889,335**	**-$62,530,299**
Health harm					
Mild alcohol dependence (B)	$17,018,480	$2,883,390	-$3,927,359	-$30,986,677	-$15,012,165

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Cost item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Expenditure on alcohol around wagering (B)	$404,681	$82,157	-$169,267	-$1,335,076	-$1,017,505
Drug use disorder (B)	$836,111	$121,432	-$344,662	-$4,133,086	-$3,520,205
Total health benefit	**$18,259,271**	**$3,086,980**	**-$4,441,287**	**-$36,454,839**	**-$19,549,875**
Work harm					
Absenteeism (B)	$59,419	$35,768	-$75,032	-$3,719,070	-$3,698,915
Reduced work performance (B)	$92,843	$30,120	-$101,945	-$2,605,063	-$2,584,045
Total work benefit	**$152,262**	**$65,888**	**-$176,977**	**-$6,324,133**	**-$6,282,960**
Total benefit of wagering advertising ban in Australia	**$39,235,284**	**$15,069,107**	**-$28,327,810**	**-$208,137,637**	**-$182,161,055**

Notes: Sourced from HILDA Wave 22 dataset (A = last 12-month wagerers) and NGTS 2023 dataset (B = monthly wagerers) projected to the Australian adult population 30 June 2023 (ABS, 2024). Black values represent an increase in costs for a specific PGSI category after the wagering advertising ban. Pink values represent a decrease in costs and therefore a benefit.

Alternative scenario B is outlined in Table 26, and shows the benefit of complete ban (100% reduction) of wagering advertising through the following mediums:

- online, including social media
- television, including streaming
- radio
- print media (e.g. newspapers, magazines)
- outdoor signage (e.g. stadiums, billboards)
- on team/player uniforms or merchandise
- betting affiliates.

Wagering advertising through direct messages (e.g. email, SMS) from WSPs were excluded from alternative scenario B complete wagering advertising ban.

The total benefit of alternative scenario B for a wagering advertising ban was $332.1 million.

Table 26: Alternative scenario B total benefits of a ban on wagering advertising in Australia, by PGSI category, 2023

Cost item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Post-ban average reduction in number of days wagering per year	15	17	17	14	15
Post-ban change in PGSI category in 2023 Australian adult wagerer population (last 12 months) (A)	10,405	420	-1,967	-8,859	0
Post-ban change in PGSI category in 2023 Australian adult regular wagerer population (≥ monthly) (B)	2,897	117	-548	-2,466	0
Direct wagering expenditure					
Yearly wagering expenditure (A)	$25,394,922	$1,919,048	-$16,964,379	-$119,844,652	-$109,495,061
Financial harm					
Bankruptcy – admin (A)	$44,333	$2,073	-$9,700	-$203,267	-$166,561
Bankruptcy – unpaid debts (A)	$129,600	$6,059	-$28,355	-$594,223	-$486,919

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FOI 27-145- Document 1

Cost item	Non-risk wagering (PGSI = 0)	Low-risk wagering (PGSI = 1–2)	Moderate-risk wagering (PGSI = 3–7)	High-risk wagering (PGSI ≥ 8)	Total wagering
Total financial benefit (bankruptcy)	**$173,933**	**$8,131**	**-$38,055**	**-$797,490**	**-$653,480**
Psychological harm					
Depression (emotional distress to wagerer) (A)	$11,912,664	$523,697	-$3,788,457	-$47,117,895	-$38,469,991
Anxiety (emotional distress to wagerer) (B)	$112,856	$60,556	-$1,279,890	-$12,902,565	-$14,009,043
Other psychological harm (B)	$0	$490,660	-$5,400,383	-$3,592,617	-$8,502,341
Total psychological benefit	**$12,025,521**	**$1,074,913**	**-$10,468,731**	**-$63,613,077**	**-$60,981,374**
Relationship harm					
Separation (A)	$5,081,892	$248,924	-$1,020,625	-$11,603,798	-$7,293,607
Emotional costs to affected others (B)	$329,748	$155,517	-$6,417,688	-$99,870,506	-$105,802,930
Total relationship benefit	**$5,411,640**	**$404,441**	**-$7,438,313**	**-$111,474,304**	**-$113,096,537**
Health harm					
Mild alcohol dependence (B)	$34,426,271	$1,848,327	-$9,572,937	-$54,983,093	-$28,281,432
Expenditure on alcohol around wagering (B)	$818,620	$52,665	-$412,587	-$2,368,974	-$1,910,277
Drug use disorder (B)	$1,691,348	$77,841	-$840,114	-$7,333,792	-$6,404,717
Total health benefit	**$36,936,238**	**$1,978,833**	**-$10,825,638**	**-$64,685,858**	**-$36,596,425**
Work harm					
Absenteeism (B)	$120,198	$22,928	-$182,890	-$6,599,158	-$6,638,922
Reduced work performance (B)	$187,810	$19,308	-$248,491	-$4,622,452	-$4,663,826
Total work benefit	**$308,008**	**$42,236**	**-$431,381**	**-$11,221,610**	**-$11,302,747**
Total benefit of wagering advertising ban in Australia	**$80,250,261**	**$5,427,603**	**-$46,166,497**	**-$371,636,992**	**-$332,125,625**

Notes: Sourced from HILDA Wave 22 dataset (A = last 12-month wagerers) and NGTS 2023 dataset (B = monthly wagerers) projected to the Australian adult population 30 June 2023 (ABS, 2024). Black values represent an increase in costs for a specific PGSI category after the wagering advertising ban. Pink values represent a decrease in costs and therefore a benefit.

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Australian Government

Department of Infrastructure, Transport,
Regional Development, Communications, Sport and the Arts

Wagering Advertising Reform

Impact Analysis

April 2026



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FOI 27-145- Document 2

Table of Contents

Introduction 4

Policy problem 5

Gambling harm is increasing and represents a significant public health concern 5

Wagering advertising is contributing to the normalisation of wagering activities among children and young people 7

Existing wagering advertising restrictions have not kept pace with community expectations 8

There are significant commercial implications associated with wagering advertising reform 11

Policy objectives and role of the government 13

Policy objectives 14

Policy options 16

Option 1 – Maintain existing arrangements (status quo) 18

Option 2 – Legislative reform to introduce a comprehensive package of reforms and provide the ACMA with adequate enforcement powers 18

Option 3 – Legislative reform to introduce a full ban on all wagering advertising and provide the ACMA with adequate enforcement powers 22

Impact analysis 23

Stakeholders identified and considered in the analysis 23

Government costs 23

Industry costs 24

Consumers costs 28

Simplified cost benefit analysis 31

Consultation 32

Key concerns raised in consultation 33

Preferred option 34

Identifying the preferred option 34

Implementation and evaluation 36

Barriers and risks 36

Implementation and commencement timings 37

Evaluation process and timings 37

Appendix A – Glossary of key terms 39

Appendix B - Full list of stakeholders consulted 40

Appendix C - Current advertising restrictions 42

Appendix D – Summary of the AGRC research 46

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FOI 27-145- Document 2

List of Figures and Tables

Table 1: Share of gambling losses by year 5
Table 2: Nielsen – Volume of wagering advertising 8
Figure 1: OzTam – Children (0-17) watching television on a weekday 9
Table 3: Cameo of wagering advertising during live sporting events in 2024 10
Table 4: Total in game exposure by inventory type – Free TV Australia 10
Figure 2: Major winter football codes active wagering sponsor status 11
Table 5: Nielsen Ad Intel – Wagering advertising spend 11
Table 6: Summary of options considered in detail 17
Table 7: Option 2 – Package of Reforms 19
Table 8: Option 3 – Online Gambling Inquiry recommended phasing of restrictions 22
Table 9: Breakdown of industry by sub-sector and business size 25
Table 10: Option 2 – Industry regulatory burden (10-year period) 26
Table 11: Option 2 – Industry financial impact 27
Table 12: Option 3 – Industry financial impact 28
Table 13: Option 1 – Socio-economic costs for Australians 29
Table 14: Option 2 – Socio-economic costs for Australians 30
Table 15: Option 3 – Socio-economic costs for Australians 31
Table 16: Net benefit analysis (per annum) 32
Table 17: Key themes from consultation 33
Figure 3: Likelihood and consequence risk rating matrix 36
Table 18: Risk management strategies 37

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Introduction

The Australian Government is committed to guaranteeing online gambling takes place under a robust legislative framework with strong consumer protections.

On 28 June 2023, the House of Representatives Standing Committee on Social Policy and Legal Affairs released its final report from the Inquiry into online gambling and its impacts on those experiencing gambling harm (Online Gambling Inquiry).

The Committee made 31 recommendations around consistent national consumer protections, online gambling regulation, research and data, illegal offshore gambling, and simulated gambling games. There are 2 recommendations that seek increased restrictions for wagering advertising[1].

Online Gambling Inquiry – Wagering Advertising Recommendations

Recommendation 16 – The Committee recommends that the Australian Government prohibit all online gambling inducements and inducement advertising, and that it do so without delay.

Recommendation 26 – The Australian Government, with the cooperation of the states and territories, implement a comprehensive ban on all forms of advertising for online gambling, to be introduced in four phases, over three years, commencing immediately:

- Phase 1 – Prohibition of all online gambling inducements and inducement advertising; prohibition of all advertising of online gambling on social media and online platforms; removal of the exemption for advertising online gambling during news and current affairs broadcasts for commercial television; and prohibition of advertising online gambling on commercial radio between 8:30 am to 9:00 am and 3:30 pm to 4:00 pm (school drop off and pick up).
- Phase 2 – Prohibition of all online gambling advertising and commentary on odds, during and an hour either side of a sports broadcast; and prohibition on all in-stadia advertising, including logos on players' uniforms.
- Phase 3 – Prohibition of all broadcast online gambling advertising between the hours of 6.00am and 10.00pm.
- Phase 4 – By the end of year three, prohibition on all online gambling advertising and sponsorship.

In line with its terms of reference, the Committee applied a public health lens in its inquiry into the impacts of online gambling. With respect to its wagering advertising recommendations, the inquiry did not comprehensively consider or assess the commercial implications associated with its recommended approach. This document assesses the financial and regulatory impacts of the Online Gambling Inquiry's recommendations, including with respect to unintended consequences of reform.

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[1] For the avoidance of doubt, this document uses the term wagering advertising while the Online Gambling Inquiry referred to "online gambling". These are synonymous in this case, with the Online Gambling Inquiry exempting advertising for lotteries from its recommendations.

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Policy problem

In considering the response to the Online Gambling Inquiry, the department has identified 4 broad policy problems:

- Gambling harm is increasing and represents a significant public health concern.
- Wagering advertising is contributing to the normalisation of wagering activities among children and young people.
- Existing wagering advertising restrictions have not kept pace with community expectations.
- There are significant commercial implications associated with wagering advertising reform, and it is imperative any reforms do not jeopardise the continued provision of public interest journalism and grassroots sports.

Gambling harm is increasing and represents a significant public health concern

In 2023-24, Australians lost approximately $32.2 billion on legal forms of gambling, representing the highest losses per capita in the world of around $1,521.[2] Total losses have increased by around 26% since 2018-19 (when losses totalled $25.6 billion).

While gaming ($19.8 billion) and lotteries ($4 billion) account for around 74% of total losses, wagering (including betting on sports and racing) is increasingly responsible for gambling losses. In 2023-24, wagering accounted for $8.4 billion (26%) of total losses, up from $3 billion (16%) in 2010-11.[3]

Table 1: Share of gambling losses by year

	2010-11		2018-19		2023-24	
	$	%	$	%	$	%
Gaming (total)	$14.3 billion	74%	$17.6 billion	69%	$19.8 billion	62%
Wagering (total)	$3.0 billion	16%	$5.0 billion	20%	$8.4 billion	26%
Lotteries (total)	$2.1 billion	11%	$2.9 billion	12%	$4.0 billion	12%
Total	$19.4 billion	100%	$25.6 billion	100%	$32.2 billion	100%

It is clear the potential for harm has increased with the proliferation of online wagering services, which have fundamentally changed the way that people bet.

Gambling prevalence data published by the Australian Gambling Research Centre in 2025 found that 65% of Australian adults had gambled at least once in the past 12 months, up from 57% in 2019. Wagering is also significantly popular in Australia, with 17.8% of Australian adults having bet on racing and 12.5% on sports in

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[2] Queensland Government Statistician's Office, *Australian Gambling Statistics, 40th edition, 1998–99 to 2023–24*, Queensland Treasury, Queensland Government, 2025.

[3] Queensland Government Statistician's Office, *Australian Gambling Statistics, 40th edition, 1998–99 to 2023–24*.

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the past 12 months. This report also found that those at risk of gambling harm increased from 11% of Australians to 15% between 2019 and 2024.[4]

Similar research published by the Australian National University (ANU) found that 33% of the Australian adult population (approximately 7 million) had gambled online in the past 12 months.[5] Further, the ANU research found that 88.5% of people who bet on sports did so online.

Research from the Australian Institute of Family Studies (AIFS) in 2025 found that for those Australian adults who regularly bet online on sports or races (at least monthly), more than 70% are experiencing, or are at risk of experiencing, gambling harm.[6] The 18-34 age group is at particular risk, with the highest proportion of those gambling at moderate and high-risk levels. Only 5% of this total at-risk group sought help for gambling in the past 12 months.

Similarly, Roy Morgan data shows that the number of Australians who bet on sport doubled between 2019 and 2024 and that 10% of those who bet on sports were classified as problem gamblers and a further 17% were classified as moderate risk.[7] Additionally, 34% of the total dollars spent on sports betting in Australia comes from persons experiencing gambling harm, despite them representing only 10% of the player base.[8]

Evidence indicates that repeated gambling can cause fundamental changes to areas of the brain related to learning, stress management and rewards processing, similar to those observed in substance addictions,[9] and can be linked with severe physiological and mental health impacts, including increased rates of suicidality.[10]

The impact of someone's gambling does not stop at just them – it also affects their family, friends and communities. An individual's gambling typically impacts up to 6 affected others for problem gamblers, up to 3 others for moderate risk gamblers, and one other person for low risk gamblers.[11] A report by the ANU found that 5.9% reported being personally affected by another person's gambling.[12]

The consequences of the prevalence of gambling related harm has a significant impact on Australia's health system. While data on gambling harms is not collected at a national level, some states and territories have collected and published data for their jurisdictions.

For example, the Victorian Department of Justice and Community Safety released a report in June 2025 that found the social cost of gambling in Victoria was estimated to be $14.1 billion in 2022-23.[13] This is more than double the previous estimate of $7 billion in 2014-15.[14] These figures account for adverse financial, emotional and psychological costs, relationship and family impacts, and productivity loss.

Separate research commissioned by the department from the AGRC estimated a national figure for the total cost of wagering in Australia based on the above Victorian figure from 2014-15, and broken down into various

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[4] G Tillman, R Irving, S Wickramasinghe, T Pappu, M Budinski, N Greer, B Whitlock and K Sakata, *National Gambling Prevalence Study Pilot 2024: Key findings*, Australian Gambling Research Centre, Australian Institute of Family Studies, Australian Government, 2025.

[5] A Suomi, M Hahn and N Biddle, *Gambling participation in Australia 2024: Trends over time, and profiles associated with online gambling*, POLIS: The Centre for Social Policy Research, Australian National University, 2024, p 15.

[6] National Gambling Prevalence Study Pilot 2024 | Australian Institute of Family Studies

[7] Roy Morgan Single Source Survey, reported in P Karp and J Butler, 'A third of Australian bets found to be placed by problem gamblers amid warning of 'predatory' industry', The Guardian, 25 June 2024

[8] Roy Morgan Single Source Survey, reported in P Karp and J Butler, 'A third of Australian bets found to be placed by problem gamblers amid warning of 'predatory' industry', The Guardian, 25 June 2024

[9] BJ Sahakian, C Langley, H Bowden-Jones and S Chamberlain, 'Gambling: What Happens in the Brain When We Get Hooked – and How to Regain Control', *The Conversation*, 16 February 2022.

[10] Healthdirect Australia, *Gambling Addiction*, Healthdirect website, 2024.

[11] N Hing, AMT Russell, M Browne, M Rockloff, C Tulloch, V Rawat, N Geer, NA Dowling, SS Merkouris, DL King, M Stevens, AH Salonen, H Breen and L Woo, 'Gambling-Related Harms to Concerned Significant Others: A National Australian Prevalence Study', *Journal of Behavioural Addictions*, 2022, 11(2):361–372, doi: 10.1556/2006.2022.00045.

[12] A Suomi, M Hahn and N Biddle, *Gambling participation in Australia 2025: Trends over time, and profiles associated with online gambling and gambling harm*, POLIS: The Centre for Social Policy Research, Australian National University, 2025, p 15.

[13] M Browne, C Tulloch, V Rawat, G Dellosa, AMT Russell, N Hing, M Rockloff and C Doran, *Social costs of gambling to Victoria 2023*, Department of Justice and Community Safety, State Government of Victoria, 2025.

[14] Browne et al., *Social costs of gambling to Victoria 2023.*

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harm categories. This research estimates the total cost of wagering in Australia for 2023 to be $26.8 billion.[15] This includes $4.9 billion in psychological harm, $8.2 billion in health harms and $5.6 billion in relationship harms. The full breakdown of wagering harm categories is included in Table 13.

Gambling harm also has a significant impact on domestic and family violence, with studies consistently pointing to an increase in both victimisation and perpetration amongst those experiencing gambling harm. Those at moderate risk of experiencing gambling harm have been found to have a 2.73-fold increase in the odds of experiencing family violence victimisation, and a 2.56-fold increase in the odds of experiencing family violence perpetration.[16] National prevalence research from the AGRC found that 19% of respondents experienced intimate partner violence from a current partner who gambled weekly or more.[17] This is consistent across other studies that have found individuals experiencing gambling harm perpetrate family or domestic violence at rates roughly 10% higher than non-problem gamblers.[18]

Wagering advertising is contributing to the normalisation of wagering activities among children and young people

Advertising is highly effective in raising awareness for brands and products, and has demonstrated success in converting non-users to users of these brands and products. Wagering advertisements are no different.

AIFS research has found that exposure to wagering advertising had the greatest impact on betting behaviour among young people (aged 18-34) and people at-risk of gambling harm.[19] Exposure to wagering advertising across any platforms prompted half of those at risk of harm to increase their betting, 28% to change what they bet on or try a new form of betting, and 29% to bet on impulse.[20]

Wagering advertising is a key influence on youth to initiate wagering. Research published in the Australian and New Zealand Journal of Public Health found that Australian children aged between 8 and 16 years old could recall wagering advertising in detail, had learned how to place a bet, and could recall betting specific technical language.[21]

Other studies interviewing young people aged 11 to 16 years old found that 23% of respondents intended to gamble when they turned 18, with boys (33.3%) demonstrating significantly higher intentions to gamble than girls (6.7%).[22]

Research by AIFS highlights that the current volume of wagering advertisements is leading to the normalisation of wagering activities, and an association with live sporting events. 69% of respondents agreed wagering advertising makes betting seem like a normal part of sport, 53% thought it normalised gambling

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[15] AGRC research commissioned by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, see summary at Appendix D.

[16] NA Dowling, C Ewin, GJ Youssef, SS Merkouris, A Suomi, SA Thomas and AC Jackson, 'Problem gambling and family violence: Findings from a population-representative study', *Journal of Behavioural Addictions*, 2018, 7(3):806-813, doi:10.1556/2006.7.2018.74.

[17] Tillman et al., National Gambling Prevalence Study Pilot 2024: Key findings, p 3.

[18] N Hing, C O'Mullan, L Mainey, N Greer and H Breen, 'An integrative review of research on gambling and domestic and family violence: Fresh perspectives to guide future research', *Frontiers in Psychology,* 2022, 13: 987379, doi:10.3389/fpsyg.2022.987379.

[19] R Jenkinson, CM Boyle, K Sakata, N Greer, U Jatkar and B Vandenberg, *Exposure and Impact of Sports and Race Betting Advertising in Australia*, Australian Gambling Research Centre, Australian Institute of Family Studies, Australian Government, 2023.

[20] Jenkinson et al., *Exposure and Impact of Sports and Race Betting Advertising in Australia.*

[21] H Pitt, SL Thomas, A Bestman, M Stoneham and M Daube, '"It's Just Everywhere!" Children and Parents Discuss the Marketing of Sports Wagering in Australia', *Australian and New Zealand Journal of Public Health,* 2016, 40(5):483–485, doi:10.1111/1753-6405.12564.

[22] C Nyemcsok, SL Thomas, A Bestman, H Pitt, M Daube and R Cassidy, 'Young People's Recall and Perceptions of Gambling Advertising and Intentions to Gamble on Sport', *Journal of Behavioural Addictions,* 2018, 7(4):1068–78, doi:10.1556/2006.7.2018.128.

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among children, 60% felt it made sport less family friendly, and 46% found that it decreased their enjoyment of sport.[23]

The NSW Youth Gambling Study 2022 found that children aged 12 to 14 years old were most likely to come across wagering promotional content on television and radio (83%) and social media (83%), while children aged 15 to 17 were more likely to be exposed on social media (74%) and phone apps (74%).[24]

Existing wagering advertising restrictions have not kept pace with community expectations

There is widespread concern across the community about the volume of wagering advertising in Australia, particularly during children and family programming and during live sporting events. The Online Gambling Inquiry found that the existing wagering advertising rules "do not appropriately reflect its potential for harm and are clearly not meeting community expectations".[25] The existing rules are outlined at Appendix C.

The department's analysis of Nielsen Ad Intel data shows there was a total of 2.9 million wagering advertisements shown on commercial television between 2017 and 2024, with most concentrated around sports and family programming.

Nielsen Ad Intel data also shows that the volume of wagering advertising decreased significantly between 2022 and 2024, down 53% on commercial television and 37% on metropolitan radio. The volume of wagering advertising impressions on online platforms has also decreased by 51% between 2022 and 2024 (from 7.2 billion to 3.5 billion).

Table 2: Nielsen – Volume of wagering advertising (millions)

	2018	2022	2024
Television	0.350	0.534	0.251
Radio	0.10	0.07	0.04
Online	-	7,250.00	3,530.00

Table notes

1. Television figures includes all free-to-air channels in metropolitan and regional areas (including SBS). Does not include advertisements shown on associated streaming services (e.g. 7plus or 9Now) or subscription television services such as Foxtel.

2. Radio figures only include metropolitan AM and FM radio stations (including commercial broadcasters and narrowcasters). Nielsen does not collect data on regional stations.

3. Online figures cover general display (e.g. static banner ads on websites) and social media (e.g. Facebook and Instagram). It does not capture all platforms. Representative data is not available from 2018.

Despite this reduction, the Australian community remains concerned about the amount of wagering advertising. Ad Standards recently released Community Sentiment Tracker, conducted by Roy Morgan, found that gambling advertising remains the leading issue of advertising concern for Australians (67%), far beyond any other category.[26] Similarly, the Australian Communications and Media Authority (ACMA) noted that the recently concluded review of the Commercial Television Code of Practice highlighted significant community

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[23] R Jenkinson, CM Boyle, K Sakata, N Greer, U Jatkar and B Vandenberg, *Community attitudes towards sports and race betting advertising in Australia*, Australian Gambling Research Centre, Australian Institute of Family Studies, Australian Government, 2023, p 3.

[24] N Hing, L Lole, H Thorne, M Rockloff, K Sproston, F Le Guyader, N Hodge and L Sellers, *NSW Youth Gambling Study 2022: Qualitative Research Report*, Office of Responsible Gambling, NSW Government, 2022, p 49.

[25] Standing Committee on Social Policy and Legal Affairs, *You win some, you lose more: Online gambling and its impacts on those experiencing*, Parliament of Australia, 2023, p 125.

[26] Ad Standards, Roy Morgan, Ad Standards Community Sentiment Tracker Report – Q2 FY26, 2026

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concern regarding wagering advertising on commercial television.[27] These concerns are focused on exposure during children and family programming, and exposure during live sporting events.

Additionally, there are concerns that this reduction in wagering advertising could be reversed once the government announces its response to the Online Gambling Inquiry. As outlined below, the wagering sector has voluntarily reduced the volume and saturation of wagering advertising on television and radio while it awaits the government's response.

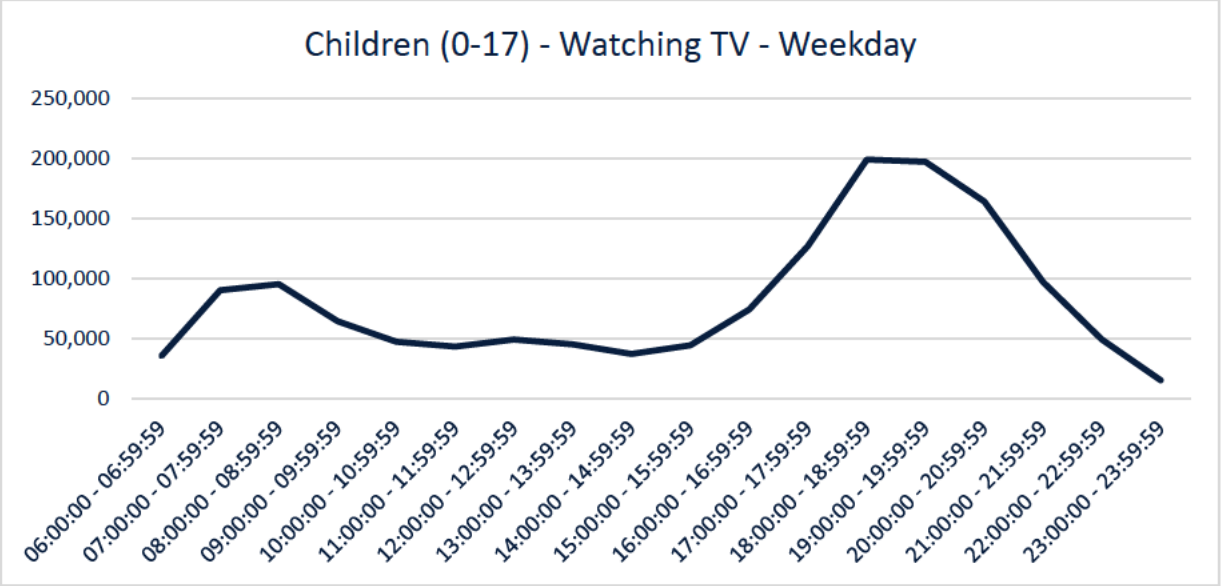
Exposure during children and family programming

A key focus of the current wagering advertising rules is to prohibit wagering advertisements during children's television programs.

This works well for younger children who primarily watch programs which are rated G or lower. However, the current wagering advertising rules fail to account for children, particularly teens, who are watching programs rated PG and above that may not be specific programs for children but which may hold significant appeal to such audiences. This includes popular family programs such as MasterChef and Lego Masters as well as popular shows such as The Office, Friends, and Seinfeld[28]. These programs can currently be subject to a high number of wagering advertisements.

Data obtained from OzTAM shows nearly 200,000 children are watching metropolitan television across Australia between 6:00 pm and 8:00 pm on a typical weekday.[29] The children audience starts to significantly decline around the 8:30pm watershed.

Figure 1: OzTam – Children (0-17) watching television on a weekday



Live sporting events

Another key focus of the existing restrictions is to limit wagering advertising during live sporting events. These rules apply to all sporting events on broadcasting and streaming services. However, these restrictions have had an unintended outcome.

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[27] Australian Communications and Media Authority (ACMA), *ACMA decision on revised Commercial Television Industry Code of Practice*, ACMA webpage, 2025.

[28] Free TV has provided confidential data to the department on percentage of audience under 18 for several popular family programs which demonstrate a significant child audience for the shows listed.

[29] Department's analysis of OzTAM data, provided in 2023.

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Following commencement of the current live sporting event restrictions, the ACMA research found that despite effectively reducing advertisements during the specified periods and programming, the restrictions led to an increase in advertisements during other periods.[30]

For example, the ACMA found there was a 96% reduction in gambling advertisements broadcast between 5:00 am and 8:30 pm on metropolitan television during the 2019 Australian Open tennis tournament (compared to the 2018 event). However, the ACMA's research found a 131% increase in gambling advertising spots after the 8:30 pm watershed (the identified time when the rules change) on metropolitan television during the 2018 AFL home and away season (compared to the 2017 season). The ACMA also found there was a 50% increase in total volume across television and radio between 2016-17 and 2018-19. This has contributed to the normalisation of wagering activities among children and young people.

The live sporting event restrictions have also been ineffective in preventing the normalisation of wagering in sport, with sports fans continuing to see a relatively large number of wagering advertisements before, during and after live sporting events on commercial television (see Table 3).

Table 3: Cameo of wagering advertising during live sporting events in 2024

	NRL State of Origin Game 1 Channel 9 Sydney	AFL Round 1 – Richmond vs Carlton Channel 7 Melbourne	AFL Grand Final – Brisbane vs Sydney Channel 7 Brisbane	NRL Grand Final – Panthers vs Storm Channel 9 Brisbane
60 minutes before	5	6	2	2
During play	1	2	0	1
60 minutes after	3	0	2	2
Total	9	8	4	5

Note that these figures do not count on-screen advertising (such as banner advertisements), sponsored segments or advertising on player jerseys and around the ground signage.

Research commissioned by Free TV Australia found that 92% of wagering advertising exposure during a sample of AFL and NRL games in 2023 came from sources located in the stadium/venue, with broadcast advertising accounting for just 8% of total exposure.[31] Note that Free TV's research excludes pre- and post-game exposure, which is when tv advertising is permitted.

Table 4: Total in game exposure by inventory type – Free TV Australia

	AFL	NRL	Combined
Apparel	22%	65%	55%
In-Stadia	59%	30%	37%
TV	19%	5%	8%

Wagering sponsorship is prevalent across Australia's professional sporting landscape. Most of Australia's major sporting competitions have an official wagering sponsor, including the AFL (Sportsbet), NRL (Sportsbet), Cricket Australia (Bet365), Rugby Australia (Bet365) and the NBL (Dabble).

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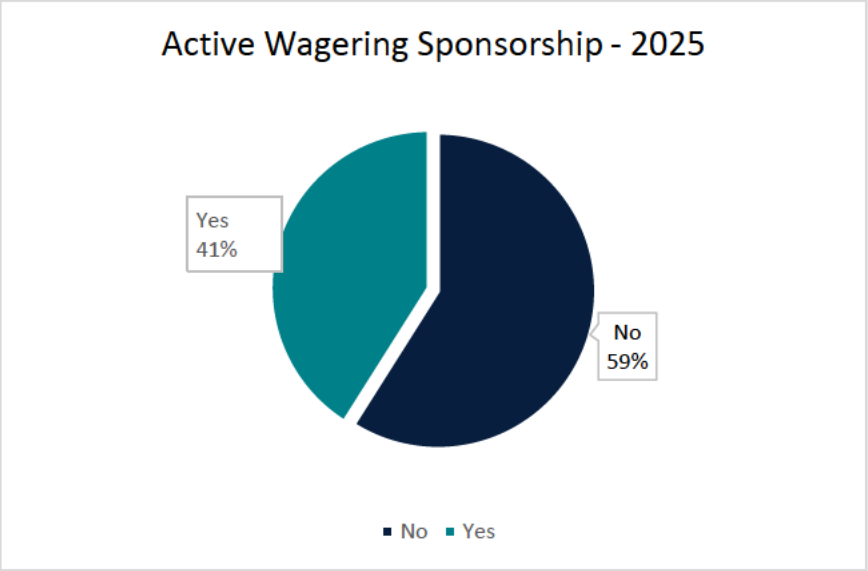
[30] Australian Communications and Media Authority (ACMA), *Gambling advertising in Australia: Consumer and advertising placement research*, ACMA, Australian Government, 2019.

[31] Research commissioned by Free TV Australia and provided to the department. The research has not been published, but the department has permission to reproduce its findings in this document.

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Desktop analysis by the department indicates 41% of professional teams across the 3 major winter football codes (AFL, NRL, Super Rugby) have an active wagering sponsor for the 2025 season. This number is significantly boosted by the NRL, where 13 out of 17 or 76% of teams do, compared with 17% in the AFL and 25% in Super Rugby.

Figure 2: Major winter football codes active wagering sponsor status



There are significant commercial implications associated with wagering advertising reform

It is imperative any reforms do not jeopardise the continued provision of public interest journalism and grassroots sports. In 2024, total gambling advertising spend was $186 million, or 1.9% of the total Australian advertising market, with wagering advertising accounting for $82 million of this.[32] This has reduced from $310 million, or 3% of the total Australian advertising market in 2022, with wagering advertising worth $217 million. This reduction could be viewed as the industry responding to the high-profile Online Gambling Inquiry and subsequent considerations from government on stronger regulation. This reduction has mostly impacted the commercial television broadcasters, which has seen wagering advertising revenue fall by 67.6% between 2022 and 2024.

Table 5: Nielsen Ad Intel – Wagering advertising spend

	2018		2022		2024	
	$ (m)	%	$ (m)	%	$ (m)	%
Television	103.0	1.4	127.9	3.3	41.4	1.3
Radio	12.7	0.8	10.7	1.5	5.0	0.7
Online	-	-	43.8	0.9	22.7	0.5

Table notes:

1. Percentages show the proportion that wagering advertising accounts for out of the total advertising revenue for each sector.
2. Television figures includes all free-to-air channels in metropolitan and regional areas (including SBS). Does not include advertisements shown on associated streaming services (e.g. 7plus or 9Now) or subscription television services such as Foxtel.

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[32] Department's analysis of Nielsen Ad Intel data, provided in March 2025 (not available for publication).

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3. Radio figures only include metropolitan AM and FM radio stations (including commercial broadcasters and narrowcasters). Nielsen does not collect data on regional stations.
4. Online figures cover general display (e.g. static banner ads on websites) and social media (e.g. Facebook and Instagram). It does not capture all platforms. Representative data is not available from 2018.

Additionally, Australia's professional sporting competitions collectively receive around $52.5 million in direct sponsorships from wagering companies each year.[33] Sporting competitions also receive funding through product fee agreements with wagering companies, which provides each sporting body a percentage of bets placed on their respective competitions. These agreements are reportedly worth around $40 million for the AFL and $50 million for the NRL each year.[34]

Both sectors use these revenues to fund important public goods such as news and public interest journalism, and grassroots and community sports. These services are highly valued by the Australian community, and any wagering advertising reforms should be balanced against the risk of reducing the sectors' capacity to continue to invest in them. Any lost revenue would compound other sustainability concerns being faced by the sectors.

The broadcasting industry is experiencing a period of structural adjustment, significantly impacted by declining advertising revenue and increased competition from global streaming services. Despite audiences increasingly shifting to digital platforms,[35] Australians continue to rely on the free-to-air broadcasting services for news and sport, particularly during natural disasters and in relation to matters of national and global significance. In 2023, 18 of the top 20 most viewed programs on television were sports,[36] and the Matildas semi-final against England in the 2023 FIFA World Cup became the most watched television program since the current measurement system began in 2001.[37]

The business operating model of broadcasting involves high fixed costs for the maintenance of physical transmission infrastructure, particularly in regional areas where populations are lower. Investment in news and public interest journalism is one of the few costs that broadcasters are able to adjust in the face of declining revenues. Recently, broadcasters have been cancelling and consolidating local news bulletins. For example, in 2021 state-wide news bulletins were cancelled in Queensland, New South Wales and Victoria following the WIN and Nine affiliation agreement,[38] Southern Cross Austereo shut down the Spencer Gulf Nightly News in April 2023,[39] Seven ceased its Gold Coast news bulletin in 2024,[40] and Nine ended its Northern Territory news bulletin in January 2025.[41] These decisions have impacted free and easy access to a range of news sources, vital for ensuring Australians can stay reliably informed.

Sport is also fundamental to the Australian way of life; the Australian Sports Commission research demonstrates that over 90% of Australian adults have an interest in sport.[42] Similarly, 47% of children aged 0-14 participate in organised outside-of-school hours sport-related activity at least once a week.[43]

As not-for-profit organisations, Australia's largest professional sporting codes invest profits back in the game, including through grassroots and community participation programs such as the AFL's Auskick, rather than paying dividends to investors.

As reported in their 2024 Annual Reports, the AFL made around $92 million investment in grassroots sport in 2024 (an increase of 51% compared to 2022),[44] while the NRL invested around $41 million (a decrease of 5%

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[33] Department's analysis of confidential information provided by sporting stakeholders in August 2024 (not available for publication).
[34] Z Samios, '$40m not enough: The AFL's plan to grab more gambling money', *The Australian Financial Review*, 28 January 2025.
[35] Australian Communications and Media Authority (ACMA), *Communications and media in Australia: Trends and developments in viewing and listening 2023–24*, ACMA, Australian Government, 2024, p.3.
[36] J Manning, 'Winning the race: TV ratings top 50 2023 all about sport, what about 2024?', *MediaWeek*, 16 January 2024.
[37] ABC, 'Matildas' Women's World Cup semi-final loss to England sets TV audience record', *ABC*, 17 August 2023.
[38] S Lawrence, 'TV news bulletins to go in Queensland, Victoria, NSW as Nine drops Southern Cross for WIN', *ABC*, 12 March 2021.
[39] N Ward, C Cominos and O Brown, 'Spencer Gulf Nightly News axed by Southern Cross Austereo', *ABC*, 13 April 2023.
[40] L Cartwright, 'Channel 7 axes Gold Coast news bulletin in yet another major shake-up', *news.com.au*, 19 November 2024.
[41] R McKnight, 'Nine staff shocked as local Northern Territory TV bulletin axed without notice', *7NEWS*, 22 January 2025.
[42] The Boston Consulting Group (BCG), *Intergenerational Review of Sport 2017*, Australian Sports Commission (ASC), Australian Government, 2017.
[43] Clearing house for Sport, *AusPlay Data Portal*, Clearinghouse for Sport website, 2024.
[44] Australian Football League (AFL), '2024 Annual Report', *AFL*, 2025.

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compared to 2022).[45] This investment typically takes the form of infrastructure investment such as changeroom facilities, as well as junior sports participation programs. This investment and encouragement of participation in community grassroots sports has health benefits as well. The more widely available and well-resourced community sport is, the more people can experience the related health and wellbeing benefits.

Similar to the broadcasting industry, Australia's sporting codes have fixed costs, including those related to salary caps, which are locked in by virtue of multi-year agreements with professional player unions, as well as costs associated with running professional competitions. When revenues fall, as they are estimated to as a result of any wagering advertising reform, it is likely that investment in grassroots and community sports program would also reduce.[46] This is particularly true for the AFL, which has committed to spending 10% of its revenue on game development and community football.[47]

Policy objectives and role of the government

Advertising regulation in Australia is intended to strike a balance between legitimate commercial interests and appropriate community safeguards.

Prior to the commencement of the Online Gambling Inquiry, the balance was widely perceived to have leaned towards commercial interests of the wagering, broadcasting and sporting sectors. According to Nielsen Ad Intel data, wagering advertising spend across all platforms in 2022 was $217 million, including $128 million on commercial television and $22 million on social media.[48]

Since the inquiry, the wagering sector has taken some action to reduce the volume and saturation of wagering advertising in response to community concerns. Wagering advertising spend decreased significantly between 2022 and 2024, down 62% across all platforms (to $82 million). Notably, Sportsbet announced ahead of the 2025 AFL and NRL seasons that it would be ceasing its promotion of odds segments during halftime breaks in response to community concerns.[49] However, anecdotally it appears these segments have largely been replaced with other Sportsbet brand advertisements.

Broadcasters, sports and wagering industry stakeholders state that wagering advertising revenue is an important mechanism for sustaining the commercial viability of major sporting codes, broadcasters and media outlets and plays a direct role in funding activities that deliver broader public benefits. Sponsorship and advertising revenues fund sport, support free-to-air broadcasting and provide opportunities for brand competition and consumer choice. These commercial benefits also generate broader economic contributions, including employment and tax revenue. Broadcasters note that advertising revenue is not confined to entertainment programming but also helps subsidise public interest content, including independent journalism and news production, both of which are essential to a healthy democracy. Similarly, sporting organisations highlight that wagering sponsorship and advertising revenue contributes to community-level programs, pathways for young athletes, and the growth of women's and grassroots sport.

The sustainability of independent journalism has direct implications for the strength of democratic institutions, while the availability of funding for women's and community sport supports social inclusion, participation, and healthier communities. Any reform to advertising regulation therefore needs to weigh not only the risks of gambling harm but also the potential consequences for media diversity, civic engagement and community wellbeing.

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[45] National Rugby League (NRL), 'NRL Annual Report 2024', *NRL*, 2025.
[46] Stakeholders have consistently advised that they do not expect to be able to substitute wagering advertisements, see Consultation section below for further detail.
[47] Australian Football League (AFL), 'AFL aims for one million participants, backed by $1B of investment', *AFL*, 19 February 2024.
[48] Department's analysis of Nielsen Ad Intel data, provided in March 2025 (not available for publication).
[49] M Chwasta, 'Sportsbet ads giving tips are gone from footy broadcasts — what's left in their wake?', *ABC*, 28 April 2025.

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Despite the reduction in wagering advertising, there is ongoing concern among harm reduction advocates that saturation and normalisation of gambling promotions continue to present risks to young people and those vulnerable to gambling harm and that the wagering sector will increase advertising where permitted to do so once the government announces its policy.

In this context, the government's role is to navigate 3 interconnected objectives:

- Community protection: reducing exposure to children and vulnerable people, while supporting harm minimisation through improved and targeted restrictions.
- Commercial viability: ensuring that sports, broadcasters and media can continue to deliver high-quality content to Australian audiences in a financially-sustainable way and with appropriate regulation. This includes recognising the flow-on benefits of advertising revenue to journalism, independent news production and the growth of community and women's sport.
- Consumer freedom: recognising that wagering is a legal activity for adults, and that advertising can support brand choice and informed decision-making where appropriate, and with appropriate protections.

Policy settings must therefore reflect both the economic and social dimensions of this issue. While industry stakeholders emphasise the importance of advertising to the financial sustainability of sport and media, community sentiment is consistently in favour of stronger restrictions and safeguards. Recent research released by AIFS shows that 64% of Australians believe government should play the biggest role in deciding how wagering is advertised.[50]

Any policy reforms will also need to recognise the unique nature of the racing industry. Wagering and racing are intrinsically linked, with betting forming a core part of the racing experience and economic model. Unlike sport broadcasts where wagering advertising is an overlay on a broader entertainment product with wide family and youth audiences, most people who engage with racing broadcasters are typically seeking to participate in wagering activities. As outlined below, the wagering sector is a legal activity for adults to participate in with a range of existing harm minimisation measures. This includes the existing advertising restrictions outlined in the previous section and at Appendix C.

For this reason, wagering advertising reform requires specific consideration with respect to racing. In practice, advertising for racing is more confined to racing channels, racing venues and specialist publications or platforms that are accessed primarily by adults seeking to bet. The policy objective in the racing context is less about reducing incidental community exposure, particularly for children, and more about ensuring responsible advertising standards within an environment where gambling is already the expected activity.

Policy considerations for racing therefore should reflect the fundamentally different context of racing compared to sport. This approach is consistent with the Online Gambling Inquiry, which recommended exempting dedicated racing channels from wagering advertising restrictions.

Policy objectives

The outcome of any wagering advertising reform should ultimately be to contribute to minimising gambling related harms and their impact on the Australian community, while balancing legitimate commercial interests. This is consistent with the established treatment for advertising regulation in Australia.

As this outcome is difficult to measure in isolation, any reforms should focus on ensuring wagering services are advertised in a responsible manner, recognising that the product has the potential to cause harm but is also linked to a legitimate and legal activity for adults.

Any reforms should aim to achieve the following outcomes:

- Removing wagering advertising during high-risk programming, such as children's and family programming, and live sporting events.
- Breaking the association between sports and wagering, particularly for children and vulnerable people.

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- Minimising the saturation and targeting of wagering advertising, particularly for children and young people. This is particularly important for online platforms which offer tools to more precisely target people that may be at risk of gambling harm.

However, government action must balance harm minimisation with legitimate commercial interests. As a legal activity, wagering companies are allowed to advertise their products, but must do this in appropriate ways to respect community attitudes and expectations.

Similarly, by way of their respective business models, broadcasters and sporting organisations are enabled to accept advertising and sponsorship revenue from any legal activity or product to fund their operations provided it is done in a responsible manner. Restricting these organisations' ability to raise funding could jeopardise the ongoing availability of news and grassroots sport, and could require the government to subsidise their provision. It is therefore important to consider these other aspects when determining the appropriate government action.

Any wagering advertising reforms should seek to reduce the volume of wagering advertising in and around programming or content that is of particular interest to children, regardless of the platform it is available on. This includes dedicated children's programming, family programming, and live sporting events. It also extends to advertising in sports venues and on players' and officials' uniforms which is often very visible during sports broadcasting.

Addressing these outputs would contribute to the long-term reversal of the normalisation of wagering activities, particularly as it relates to children and its association with sport. There is no available evidence to reliably estimate a time frame to see a noticeable change in attitudes. While some international jurisdictions have implemented wagering advertising bans and restrictions (e.g. the Netherlands introduced restrictions on mass marketing on television, radio and outdoor advertising in public places, and Belgium banned wagering advertising in 2023), it is too soon to determine the impact these have had on wagering knowledge among the community.

If these objectives are achieved, then the wagering advertising reforms should contribute to addressing the prevalence of gambling-related harm in Australia over the long-term.

There is already preliminary evidence which may suggest the wagering industry's self-regulated reduction in wagering advertising since 2022 has had an effect on wagering behaviour in Australia. As noted earlier, wagering advertising has declined by a significant 53% on commercial television since 2022. Recent Queensland Treasury data on wagering expenditure has demonstrated a reduction in real wagering expenditure in Australia across both 2022-23 and 2023-24, coinciding with the period where advertising has reduced. Similarly, per capita wagering expenditure has declined from a high of $409.64 in 2021-22 down to $398.42 in 2023-24. In the 2 years prior when wagering advertising reached its highest volume in Australia, the same per capita expenditure figure grew from $230.60 in 2019-20 to $409.64 in 2021-22.[50]

While it is not possible to draw causal conclusions from this data, it should be noted that in the 2 years since the wagering industry has voluntarily reduced its advertising, real and per capita wagering expenditure has seen a reduction. This suggests that more significant wagering advertising reforms imposed by government would contribute to addressing the prevalence of gambling-related harm in the long term.

Government's capacity to intervene

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[50] Queensland Government Statistician's Office, *Australian Gambling Statistics, 40th edition, 1998–99 to 2023–24*.

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The Australian Government is best placed to address the issues relating to wagering advertising and has previously taken regulatory action in this space. It is imperative that any reforms in this space are nationally consistent to ensure all Australians benefit from clear and consistent minimum protections.

The wagering sector is already heavily regulated in Australia. Responsibility for the regulation of gambling services is shared between Commonwealth, state and territory governments.

The Australian Government has responsibility for the *Interactive Gambling Act 2001* (IGA) which is the primary Commonwealth legislation regulating the types of interactive gambling services that can be provided to persons located in Australia. The IGA currently includes restrictions around the advertisement of illegal gambling services.

The Australian Government also has responsibility for various harm minimisation measures, including existing wagering advertising rules under the *Broadcasting Services Act 1992* (BSA), anti-money laundering obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*, and sports integrity.

The Australian Government's responsibility under the BSA also extends to the regulation of the broadcasting sector, and to some degree the streaming sector.

Further, there is an existing regulator in the Australian Communications and Media Authority (ACMA). Established under the *Australian Communications and Media Authority Act 2005*, the ACMA is responsible for enforcing compliance with the existing gambling-related provisions under the IGA and BSA including with respect to wagering advertising. Minimising gambling harm is one of the ACMA's enduring priorities identified in its 2025-26 compliance and enforcement priorities.[51]

Existing regulation, resourcing and the subject matter expertise of the ACMA demonstrates the government has the capacity to support further regulation in this space.

State and territory governments have responsibility for the licensing and regulation of all gambling products and services, including the wagering sector. As part of this remit, some states have taken action to further reduce or restrict wagering advertising in their jurisdictions. For example, South Australia has banned all gambling advertising on radio between 6:00 am and 8:30 am on a weekday and on television between 4:00 pm and 7.30 pm on a weekday,[52] NSW has banned gambling advertising on public transport,[53] and Victoria prohibits gambling advertising on roads (billboards), public transport, and within 150 metres of schools.[54]

Policy options

The department has considered a range of voluntary, co-regulatory, and regulatory approaches to address concerns with the volume and saturation of wagering advertising.

The department notes there are existing self- and co-regulatory codes in place that contain restrictions for wagering advertising, however as outlined above these frameworks have not kept pace with community expectations.

Additionally, the co-regulatory codes in particular are limited in application to specific broadcasters and do not extend to like services (e.g. 7plus or Netflix). The ACMA has called on broadcasters to make changes to their codes of practice to address the expectations of audiences, including for the commercial television

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[51] Australian Communications and Media Authority (ACMA), *Compliance and enforcement priorities 2025–26*, ACMA website, 2025.

[52] Consumer and Business Services, *Authorised Betting Operations Gambling Code of Practice [PDF]*, Gambling and Associations, Government of South Australia, 2025, p 14.

[53] Minister for Gaming and Racing and Minister for Transport, *Minns Government moves to ban gambling advertising from trains* [media release], NSW Government, 28 January 2025.

[54] Premier of Victoria, *Gambling Ad Ban Near Schools, Roads And Public Transport* [media release], State Government of Victoria, 17 September 2017.

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sector to voluntarily extend its broadcast safeguards to all television content provided online.[55] This has not occurred to date, with the ACMA recently deciding to not register a revised commercial television code due to concerns it did not provide appropriate community safeguards.

A legislative approach would therefore resolve these concerns by removing vested commercial interests from the equation. Crucially, it would provide a platform-neutral approach where appropriate and would ensure the ACMA has adequate powers to enforce compliance (including financial penalties).

The department has also considered a broad range of options to achieve the policy objectives. This includes:

- content restrictions (e.g. inducement advertising or the use of celebrities in marketing material)
- time-based restrictions (e.g. banning wagering advertising during certain times of the day, such as between 5:00 am and 10:00 pm)
- program-based restrictions (e.g. banning wagering advertising during certain program types, such as live sporting events, children's programming or family programming)
- frequency limits (e.g. limiting the frequency of wagering advertising during a specific period, such as no more than 2 wagering advertisements per hour or no more than 9 per day)
- user-based restrictions (e.g. banning wagering advertising for certain users, such as banning for all people under 18 and empowering adults to choose whether they wish to see wagering advertisements)
- location-based restrictions (e.g. banning wagering advertising at specific locations, such as at sports venues, in shopping malls, or near schools).

Having considered the above options and approaches, the department has considered the following 3 policy options in detail to address the harms associated with wagering advertising:

- Option 1 – Maintain existing arrangements (status quo).
- Option 2 – Legislative reform to introduce a comprehensive package of reforms and provide the ACMA with adequate enforcement powers.
- Option 3 – Legislative reform to introduce a full ban on all wagering advertising and provide the ACMA with adequate enforcement powers.

The content of these 3 options is summarised in the following table and considered in further detail in the remainder of this section.

Table 6: Summary of options considered in detail

Option 1	Option 2	Option 3
Maintain existing arrangements (status quo)	Legislative reform to introduce a comprehensive package of reforms and provide the ACMA with adequate enforcement powers	Legislative reform to introduce a full ban on all wagering advertising and provide the ACMA with adequate enforcement powers
No Australian Government changes	A comprehensive package of reforms to achieve a meaningful reduction in the volume of wagering advertising across broadcast, online and out-of-home.	A full ban on all wagering advertising across all platforms, introduced across 4 phases
	Compliance and enforcement powers for the ACMA (e.g. financial penalties)	Compliance and enforcement powers for the ACMA (e.g. financial penalties)

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[55] ACMA, ACMA decision on revised Commercial Television Industry Code of Practice.

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Who the reform would apply to

Options 2 and 3 would involve legislative reform that would apply to all licensed wagering service providers. The reforms under Option 2 would primarily be limited to broadcasting, online and out-of-home platforms, while Option 3 would cover all platforms (also including print).

Obligations for compliance under both Option 2 and 3 would be shared between wagering service providers and operators of platforms permitted to display wagering advertising. This includes licensed Australian broadcasters (e.g. Seven West Media and Nine Entertainment Co.), streaming services (e.g. Netflix and Disney+), social media platforms (e.g. Facebook and TikTok), general and news websites (e.g. Crikey and news.com.au), sports leagues and clubs (e.g. AFL and NRL), sports stadium operators (e.g. MCG Trust and Stadiums Queensland), and out-of-home (e.g. oOh! Media and QMS Media).

Consistent with the Online Gambling Inquiry, advertising for lotteries and other forms of gambling (e.g. keno and land-based venues) are outside the scope of these reforms.

Option 1 – Maintain existing arrangements (status quo)

This option would involve no Australian Government intervention, with wagering advertising continuing to be subject to a range of self-regulatory, co-regulatory, and regulatory frameworks (refer to Appendix C).

Any changes to these rules would be a matter for the various owners of these frameworks, which the Australian Government has no role in. For example:

- Broadcasters could voluntarily make changes to their co-regulatory codes of practice, in consultation with the ACMA.
- The Australian Association of National Advertisers (AANA) could voluntarily make changes to its self-regulatory code which primarily goes to the content of wagering advertising.
- Wagering service providers could continue to voluntarily make changes to their advertising practices (e.g. Sportsbet voluntarily removing promotion of odds during the half-time break of the AFL and NRL).

Given the Australian Government's limited role in these frameworks, it would be difficult to ensure appropriate rules are put in place in a timely manner. It would also be difficult to ensure consistency across platforms, which could see broadcasters continue to have a more onerous ruleset compared to streaming services.

Option 2 – Legislative reform to introduce a comprehensive package of reforms and provide the ACMA with adequate enforcement powers

Option 2 would introduce a comprehensive package of legislative reforms to minimise children's exposure to wagering advertising and reduce the saturation and targeting of wagering advertising. The legislative approach would streamline implementation across all platforms and provide strong penalties for non-compliance.

This option acknowledges that wagering is a legal activity for Australian adults, while recognising the potential for harm associated with high exposure to children and vulnerable people. This package takes advantage of available technologies where possible to focus on reducing exposure of wagering advertising to children and vulnerable people.

Where appropriate, wagering advertising restrictions should be platform neutral to ensure consistency in all places where Australians are likely to see wagering advertising.

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The following table outlines the restrictions that would apply to each platform. All platforms restrictions are intended to apply to all platforms, unless a platform-specific restriction goes further (e.g. the broadcast ban at all times).

Table 7: Option 2 – Package of Reforms

Platform	Restrictions
Live Sporting Events	• Ban wagering advertising during live sporting events on broadcast and streaming between 6:00am and 8:30pm, including 5 minutes before and after the live sporting event. ○ Wagering advertising will continue to be permitted during scheduled breaks (e.g. half-time) after 8:30pm. • Ban wagering advertising at sports venues and on officials' uniforms (e.g. player jerseys and coaches' polos).
Frequency cap on broadcast television	• Restrict wagering advertising on broadcast television to no more than 3 wagering advertisements per hour per channel between 6am and 8:30pm.
School drop-off and pick-up on broadcast radio	• Ban all wagering advertising on broadcast radio during school drop-off (8:00-9:00am) and pick-up (3:00-4:00pm) hours.

Triple lock functionality on online platforms	• Ban wagering advertising on online platforms that do not offer 'triple lock' functionality (i.e. to display wagering advertisements a platform must:
	  ○ require users to be signed in
	  ○ confirm that a user is over 18 years of age
	  ○ allow users to opt out of wagering advertisements
	• All platforms restrictions above will apply when wagering advertising is permitted.

Content restrictions	• Ban wagering service providers from using notable people and players to promote wagering services. • Ban wagering service providers from the promotion of odds in wagering advertisements.

Consistent with the Online Gambling Inquiry, an exemption for dedicated racing channels, programs and racetracks will be provided in recognition of the intrinsic link between racing and wagering and the limited exposure for children. Dedicated betting websites and venues (e.g. TAB outlets) will also be exempt given users are seeking these services out.

Live sporting events

This option would enshrine existing protections on wagering advertising during live sporting events shown on broadcast and streaming platforms in legislation. These existing restrictions are currently split across the BSA and the co-regulatory broadcasting codes of practice. Placing these in the IGA simplifies the regulatory framework and enables strong penalties for non-compliance.

Wagering advertising will continue to be banned during live sporting events shown on all platforms (including broadcast television and radio, streaming, and social media) at all times to protect children who may be watching or listening. The rules would be stronger between 6:00am and 8:30pm to further protect children, including banning wagering advertising during scheduled breaks as well as 5 minutes before and after a live sporting event.

This option would also introduce a new ban on all wagering advertising in sports venues and on players' and officials' uniforms. It will capture any on-field and perimeter signage, as well as signage in coaches' boxes.

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These live sporting event restrictions would significantly reduce children's exposure to wagering advertising when attending or watching sports.

The existing exemption for the incidental broadcast of digital advertising of illegal offshore gambling companies in matches played overseas should also be removed. This would provide better protections for Australian viewers of international sporting events, such as Formula 1 (which often includes advertisements for 188 Bet) and the NBA (which often includes advertisements for ESPN Bet). These advertisements are currently allowed due to the Australian broadcasters not receiving a benefit from the advertisement. The ACMA issued a compliance alert on 21 May 2025 to notify broadcasters and streamers about its expectations and approach to gambling advertising in international live sporting feeds which indicates the technical capacity to remove such digital advertising exists.[56]

An exemption for the incidental broadcast of physical advertising (e.g. physical billboards and player jerseys) in overseas feeds should be retained due to technical limitations.

Despite the existing restrictions, users continue to see a relatively large number of wagering advertising when watching live sport. Table 3 provides examples of the volume of wagering advertising during select games from 2024. The proposed frequency cap on broadcast television (see below) would also ensure pre- and post-match content is not saturated with wagering advertising.

Frequency cap on broadcast television

One of the policy objectives for reform is to minimise the saturation and targeting of wagering advertising, particularly for children and young people.

This proposal would limit the frequency of wagering advertising on broadcast television to no more than 3 wagering advertisements per hour per channel between 6:00am and 8:30pm.

This would apply to all terrestrial television channels in recognition of the limited capability to tailor advertising to individuals as a one-to-many medium. Streaming services (e.g. 7plus and SBS On Demand) will be subject to separate user-based requirements (see triple lock section below).

This limit will stop wagering advertising from saturating programs, including those that are not explicitly targeted at children but that a significant number of children may still be watching. This includes during news and current affairs programs which was a key concern of the Online Gambling Inquiry.

The frequency cap will be applied only between 6:00am and 8:30pm. This is primarily to protect Australian children from excessive exposure when they are likely to be watching television. A frequency cap will also restrict wagering providers from bombarding sports broadcasts with wagering advertising, especially prior to kick off. These programs are heavily watched by children and families, and a frequency cap will ensure children's exposure to wagering advertising is minimised and contribute to breaking the nexus between wagering and sport.

School drop-off and pick-up on broadcast radio

This option would ban all wagering advertising on broadcast radio during school drop-off and pick-up hours. This aims to reduce children's exposure while they are in the car or bus (where there is limited to no parental supervision) on the way to and from school.

This option is consistent with the principle of the Online Gambling Inquiry's recommendation. However, the restricted period should be extended to one hour (8:00-9:00am and 3:00-4:00pm) to ensure all jurisdictions and school times are captured. School hours in Australia typically range from 8:30-9:00am to 3:00-3:30pm meaning children are in transit before and after these times.

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[56] Australian Communications and Media Authority (ACMA), *Gambling ads during international live sporting feeds, ACMA, Australian Government, May 2025.*

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These restrictions would apply to all terrestrial radio channels in recognition of the limited capability to tailor advertising to individuals. Radio and podcast streaming services would be subject to separate user-based requirements (see triple lock section below).

Data supplied to the department by Commercial Radio and Audio shows that between 11-12% of the total audience during these times is between 10 and 17 years of age. A further 9-10% of the audience is in the 18-24 age bracket and 22-23% are in the 25-39 age bracket, both of which are considered key demographic targets for wagering companies. This means around 45% of the total audience during the school drop-off and pick-up hours are either under 18 or considered high-risk from a gambling harm perspective.

Triple lock functionality on online platforms

In contrast to broadcast television and radio, online platforms are able to implement user-based restrictions to control the type of advertising displayed to individual viewers. This makes it technically feasible for interested adult viewers to receive wagering advertising while children, vulnerable people, and people who do not wish to see any wagering advertising will not.

Under this option, wagering advertising will be banned by default on all online platforms at all times. This would provide strong baseline protections for all Australians, particularly children and young adults.

An exemption will be included to permit wagering advertising on online platforms that offer triple lock functionality. This means only platforms that have implemented the following 3 'locks' will be permitted to display wagering advertising to users:

- require users to be signed in,
- confirm that a user is over 18 years of age, and
- allow users to opt out of receiving all wagering advertising.

The obligation for implementing these controls will be placed on the online platform, not on users (except as it relates to opting out).

This exemption recognises that wagering is a legal activity for Australian adults and that advertising can support brand choice and informed decision-making where appropriate. This would enable responsible wagering advertising to Australians who may be interested in receiving it.

This triple lock exemption would apply to all online platforms and device applications, including:

- streaming services (e.g. SBS On Demand, 7plus, Netflix, Disney+)
- social media (e.g. Facebook, Instagram, Snapchat, YouTube)
- search engines (e.g. Google, Bing, Yahoo)
- music and podcast services (e.g. Spotify, Apple Podcasts)
- app stores (e.g. Apple App Store, Google Play Store)
- general websites and apps, including sporting codes (e.g. AFL.com.au and the NRL app) and news websites and apps (e.g. The Canberra Times, The Courier Mail).

An online platform that is unable or unwilling to implement all 3 'locks' will be prohibited from displaying wagering advertising to all of its users regardless of their age. Wagering advertising on platforms that do implement 'triple lock' functionality will also be subject to the all platforms restrictions outlined above.

The government has also separately implemented a social media minimum age and age assurance for search engines as part of the Phase 2 Codes. These measures do not extend to all online platforms, whereas the proposed triple lock for wagering advertising does. While these age assurance measures may support triple lock implementation for social media and search engines, it is not proposed to be as onerous.

Implementation of the triple lock measure may also coincide with the introduction of a digital duty of care framework for online service providers in the *Online Safety Act 2021*. The government announced an intention to legislate a digital duty of care in November 2024. The Department is currently developing a duty of care model for legislation, informed by ongoing consultation. Potential interactions with the triple lock

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measures will be considered through the legislative design process and implementation of the digital duty of care.

Content restrictions

This package would also place additional restrictions on the content of the wagering advertising that is permitted to be shown. These restrictions aim to reduce the appeal of wagering advertising to children and young adults, and to reduce the associated harm from exposure to them.

This includes a ban on the use of notable persons (including current and former sports stars) to promote wagering, unless they are a legitimate employee of a wagering company.

In recent years wagering service providers have included a number of high-profile persons in their wagering advertisements. These have included basketballer Shaquille O'Neal, actor Mark Wahlberg and social media influencers The Inspired Unemployed. Use of such figures has been argued to strongly appeal to children and young people, which has the potential to increase gambling harm. Other countries, including the United Kingdom, have imposed such a ban.

Option 3 – Legislative reform to introduce a full ban on all wagering advertising and provide the ACMA with adequate enforcement powers

This option would introduce a legislative prohibition on wagering advertising across all platforms, consistent with the Online Gambling Inquiry's recommendation.

This option is consistent with the approach taken for the advertisement of tobacco and vaping products, which are prohibited on all platforms in recognition of the significant harm experienced from consumption of these products.

A full ban could be phased-in to minimise the impact on affected sectors. The following table outlines the 4-phase approach recommended by the Online Gambling Inquiry.

Table 8: Option 3 – Online Gambling Inquiry recommended phasing of restrictions

Phase	Restrictions
Phase 1	• Ban on all wagering inducement advertising. • Ban on all wagering advertising on social media and online platforms. • Ban on wagering advertising on radio between 8:30 am to 9:30 am and 3:30 pm to 4:00 pm, reflecting school pick-up/drop-off times.
Phase 2	• Ban on wagering advertising during live sports broadcasts, and 60 minutes before and after. • Ban on all in-stadia advertising, including jersey sponsorships.
Phase 3	• Ban on wagering advertising on radio and television between 6:00 am to 10:00 pm.
Phase 4	• Ban on all wagering advertising and sponsorship.

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Impact analysis

The department has considered the following to determine the net benefit of each policy option considered:

- regulatory burden on industry and governments
- socio-economic benefits for Australians and governments
- direct financial impacts on industry, and subsequent effect on the provision of public goods.

The department commissioned the Australian Gambling Research Centre (AGRC) to estimate the potential socio-economic benefit of options for wagering advertising reform. This included the Online Gambling Inquiry's proposed full ban, as well as intermediate options identified by the department. This report (not published) forms the basis for the department's assessment of the socio-economic benefits for Australians and governments in this section.

While the AGRC's report did not consider the package of reforms proposed in Option 2, it did provide estimates for the benefit of 2 partial ban approaches. The department has used the range between these 2 estimates to approximate the socio-economic benefit of Option 2 in this section. More information on this report, including core assumptions and limitations, is outlined at Appendix D.

The department also used a simplified cost benefit analysis to compare the net benefit of the identified options. This net benefit is one of the inputs to the department's decision rule to identify the preferred option, alongside the policy objectives and stakeholder consultation outlined in this document. This approach was selected due to limited availability of reliable data and evidence to support a formal cost benefit analysis.

Stakeholders identified and considered in the analysis

The department identified the following stakeholder groups as being potentially impacted by the reform options:

- government (including the federal, states and territories)
- industry (including wagering service providers, broadcasters, sporting codes and clubs, streaming services, social media and general websites)
- Australian consumers and community.

In total, the department has identified 2,461 industry members that will be impacted in some way by the preferred option. This comprises:

- 180 wagering service providers
- 2,267 broadcasters, including 5 commercial television broadcasters, 260 commercial radio broadcasters, 1 subscription television broadcaster, 1 national broadcaster (SBS), and around 2,000 narrowcast radio broadcasters
- 4 sporting codes
- 5 social media services
- 5 streaming services.

The department has not estimated the number of general websites, including news websites, that would be impacted by the preferred option. Additionally, out-of-home platforms (including stadiums and billboards) have been considered due to limited availability of data for this sector.

Government costs

The department considers each option will have a varying level of cost for government associated with the regulatory burden and socio-economic benefits.

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Option 1

This option does not introduce any new regulatory costs on governments.

There will likely be increased demand for government expenditure to address wagering harm if this option enables wagering harm to continue to grow in Australia. This includes expenditure on social welfare, support services, and law enforcement. Responsibility for these measures is shared between federal, state and territory governments.

Option 2

This option is estimated to have a moderate budgetary impact on the Australian Government.

The ACMA will have an expanded role with respect to wagering advertising. The ACMA's remit will be significantly expanded to include streaming services, social media services, and general websites (including news and sports websites). The department estimates additional resourcing for the ACMA to administer these restrictions will cost around $10 million per annum. The ACMA may be able to absorb these additional responsibilities within its existing budget and resourcing.

There may also be an indirect impact on the revenue raising capability of the state and territory governments if this option led to a significant reduction in wagering activity. AGRC's research found that total yearly wagering expenditure would decline by $62.7 million (0.8%) if a partial ban was implemented. The department is not able to estimate the decline in state and territory revenue at this time.

If wagering activity does decline as a result of this option, there may also be a reduced demand for government expenditure on support services. There is insufficient information available to estimate these costs to government.

Option 3

Option 3 is estimated to have a smaller budgetary impact on the Australian Government compared with Option 2. This is due to the relative simplicity of enforcing compliance with a wagering advertising ban across all platforms.

The department estimates costs for the ACMA to administer these restrictions at around $5 million per annum. The ACMA may also be able to absorb this cost within its existing resourcing.

Similar to Option 2, there may be an indirect impact on the revenue raising capability of the state and territory governments if the wagering adverting ban led to a significant reduction in wagering activity. AGRC's research found that total yearly wagering expenditure would decline by $109.5 million (1.4%) if a full ban was implemented. The department is not able to estimate the decline in state and territory revenue at this time.

As this option has a greater impact on wagering harm, the demand for government expenditure on social welfare, support services and law enforcement in relation to wagering, may be significantly reduced. There is insufficient information available to estimate these costs to government.

Industry costs

This section provides an estimate for the regulatory burden and financial impact on industry from each of the policy options.

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A regulatory burden measurement framework has been calculated for each of the shortlisted policy options, in accordance with the guidance provided by the Office for Impact Analysis, and has been calculated on a 10-year basis.[57]

Industry salary costs were based on research for similar roles in similar organisations and estimates of additional staffing requirements. Industry stakeholders were consulted to provide information to support this estimate, however they indicated they were not able to provide estimates until the government's policy was announced.

The take-home salary per additional full-time equivalent (FTE) staff member was estimated to be $120,000 per year.[58] Additional non-wage labour costs were included in line with the Office for Impact Analysis guidance at a rate of 75% – giving a total annual cost of $210,000 per full-time equivalent staff member.

For the purposes of this impact analysis, the department has focused on 44 main businesses across the broadcasting (12) sport (4), online (10) and wagering (18) sectors. The department has broken each sub-sector down to small/very low risk, large, and very large businesses to assist with the calculations. Where a business operates across multiple sectors, they have only been counted against their main sector. For example, Nine Entertainment Co is a licensed broadcaster and also operates an online platform (e.g. its 9Now and Stan streaming services) but it has been included as a broadcaster.

Table 9: Breakdown of industry by sub-sector and business size

Business Size	Broadcasters	Sports	Online Platforms	Wagering	Total
Small/very low risk	3	0	0	8	11
Large	5	2	2	6	15
Very large	4	2	8	4	18
Total	**12**	**4**	**10**	**18**	**44**

Option 1

This option does not introduce any new regulatory costs on industry and may enable a positive financial impact.

Assuming wagering advertising returns to 2022 levels as a result of no government intervention, the broadcasting and online sectors may experience a positive impact of around $117.2 million (compared to 2024).[59]

Option 2

This option is likely to have the highest comparative regulatory burden on industry and a moderate financial impact.

The estimated costs to industry for complying with these restrictions is $23.5 million over a 10-year period. Table 10 below provides a breakdown by industry sector.

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[57] The Office of Impact Analysis (OIA), *Regulatory Burden Measurement*, Department of the Prime Minister and Cabinet, Australian Government, 2024.
[58] Glassdoor, *Advertising Manager Salaries*, Glassdoor website, 21 September 2023.
[59] Department's analysis of Nielsen Ad Intel data, provided in March 2025 (not available for publication).

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Table 10: Option 2 – Industry regulatory burden (10-year period)

Business Size	Broadcasters	Sports	Online Platforms	Wagering	Total
Small-medium	$3.2 million	$0	$0	$8.4 million	$11.6 million
Large	$5.3 million	$2.1 million	$2.1 million	$2.5 million	$12.0 million
Very large	$0	$0	$0	$0	$0
Total	**$8.4 million**	**$2.1 million**	**$2.1 million**	**$10.9 million**	**$23.5 million**

Assumptions

This estimate assumes that:

- small-medium online platforms will not implement the triple lock, instead choosing a full ban and not requiring additional resourcing to ensure compliance
- large businesses (except broadcasters) will require some additional resourcing to ensure compliance (estimated at 0.5 FTE)
- very large businesses across all sectors already have sufficient resourcing to enforce compliance with the proposed restrictions
- the broadcasting sector will not require any additional resourcing to ensure compliance with the proposed frequency cap or school drop-off and pick-up restrictions, however some resourcing will be required to implement the triple lock on streaming services operated by large broadcasters (estimated at 0.5 FTE)
- the wagering sector will require some additional resourcing to ensure compliance with the proposed restrictions estimated at 0.5 FTE for small-medium businesses and 0.2 FTE for large businesses.

Additional costs may apply for online platforms that choose to implement 'triple lock' functionality, including costs associated with the underlying technology to enable users to opt out and for platforms to check users ages. This includes for the broadcasting sector to implement this functionality for its streaming services.

The department does not have sufficient information to estimate the cost of building such a system. However, it should be noted that most online platforms already offer variations of a triple lock today. For example:

- The AFL allows users to sign in to its app/website, declare you are over 18 and opt out of wagering advertising.
- SBS On Demand requires users to be signed in to view content, viewers can provide their birth year and are able to opt out of wagering advertising.
- YouTube currently only shows wagering advertising when a user is logged in and is over 18 and provides an option to "reduce" the amount of wagering adverting.
- Facebook only provides wagering advertising to users who are signed in and over 18 and enables users to opt out of advertising from specific providers (e.g. Sportsbet, PointsBet).

These existing systems should minimise the cost of compliance for those platforms that choose to implement triple lock functionality.

This option would also have a high financial impact on affected sectors (excluding the wagering sector). The department estimates the short-term total impact across all sectors to be around $111.3 million per annum (or $1.1 billion over 10-years). Including the wagering sector (which may experience a positive financial impact), the 10-year impact is $347.7 million).

However, industry has suggested the impact should be assessed against 2022, prior to the commencement of the Online Gambling Inquiry. This is largely due to the wagering sector voluntarily taking action to reduce the volume and saturation of wagering advertising in response to community concerns. Using the 2022 figures would almost double the impact to be around $213 million per annum (or $2.13 billion over 10-years).

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Despite these views, the department has considered the 2024 impact outlined above in its impact analysis. The department considers industry has shown some capacity to absorb the impact between 2022 and 2024, without significant loss of services. Recently reported profits for the 2024-25 financial year for Seven West Media ($57 million[60]) and Nine Entertainment Co ($133 million[61]) were achieved despite the reduction in wagering advertising revenue. However, these results also indicate the sector has limited capacity to absorb further reductions from the 2024 baseline. The following table outlines the estimated financial impact for each sector compared to this 2024 base line.

Table 11: Option 2 – Industry financial impact

	Broadcasters	Sports	Online Platforms	Wagering	Total
2024 Base Line	$64.0 million	$52,500,000	$22.7 million	$0	$139.2 million
Impact (p.a)	-$19.2 million	-$47.3 million	$0	+$3.8 million	+$62.7 million
Impact (10-years)	-$192 million	-$472.5 million	$0	+$38 million	+$627 million

Assumptions

The financial impact outlined above uses a combination of data sources, including Nielsen Ad Intel, Standard Media Index, and information provided by stakeholders through consultation. The estimate assumes:

- The department estimates broadcasters will lose around 30% of their wagering advertising-related revenue through the broadcast restrictions under this option. Radio broadcasters will be especially hit by the school drop-off and pick-up which is the most lucrative advertising period. However, they may be able to recoup some through advertising on their streaming services. The department does not have sufficient information to estimate this amount.
- Sports will lose 100% of their sponsorship revenue through a combination of the broadcast and stadium bans under this option; however, they may be able to recoup some revenue through wagering advertising on their websites. The department has assumed the sports may retain 10% of the existing revenue.
- Online platforms on the whole will not see a reduction in wagering advertising through this option. While some Australians will not see any wagering advertising, the wagering sector is likely to maintain or increase wagering advertising on online platforms that implement triple lock.
- Wagering service providers will recoup around $66.5 million through lower advertising spend, however this may be redistributed to other platforms. This is balanced against the estimated reduction in wagering expenditure as a result of the restrictions in this option ($62.7 million). The 2024 base line for the wagering sector is $0 as they do not earn wagering advertising revenue.

Option 3

This option is estimated to have no regulatory burden on industry but a significant financial impact.

The department considers a full ban across all platforms would be simple to implement and would not require any additional staffing or systems to ensure compliance.

However, the department estimates the financial impact on affected sectors (excluding the wagering sector) would be significant.

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[60] Seven West Media Limited, *2025 Full Year Results – Investor Presentation* [PDF], Seven West Media Limited, 2025.
[61] ASX Limited, *Nine Entertainment Co. FY25 Final Results*, Nine Entertainment Co., 2025.

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Based on the 2024 baseline, the short-term financial impact would be around $139.2 million per annum (or $1.4 billion over 10-years). This impact is similarly lower compared to the 2022 figures ($213 million per annum or $2.13 billion over 10-years).

Including the wagering sector (which may experience a positive financial impact), the 10-year impact is $1.1 billion).

The following table outlines the estimated financial impact for each sector compared to this 2024 base line.

Table 12: Option 3 – Industry financial impact

Business Size	Broadcasters	Sports	Online Platforms	Wagering	Total
2024 Base Line	$64.0 million	$52.5 million	$22.7 million	$0	$139.2 million
Impact (p.a)	-$64.0 million	-$52.5 million	-$22.7 million	$29.7 million	-$109.5 million
Impact (10-years)	-$640.1 million	-$525.0 million	-$227.2 million	$297.4 million	-$1.1 billion

Assumptions

The financial impact outlined above uses a combination of data sources, including Nielsen Ad Intel, Standard Media Index, and information provided by stakeholders through consultation.

The estimate assumes all sectors will lose all existing wagering advertising revenue. While online platforms are likely to recoup most lost revenue, based on the relative growth in the total online advertising market, it is understood that broadcasters and sports will be significantly more limited in their capacity to recoup lost revenue. The reasons behind this are explored further in the consultation section.

Additionally, wagering service providers will recoup around $139.2 million through lower advertising spend, however this may be redistributed to other platforms. This is balanced against the estimated reduction in wagering expenditure as a result of the restrictions in this option ($109.5 million). The 2024 base line for the wagering sector is $0 as they do not earn wagering advertising revenue.

Additional sectors would be affected by a full ban, including print ($10.2 million per annum) and out-of-home ($2.8 million per annum). This would increase the financial impact to around $152.2 million per annum, or $1.5 billion over 10-years.

Consumers costs

This section provides an estimate of the socio-economic benefits for Australians of the identified policy options.

The department considers there will be no regulatory burden or direct financial impact on Australians under any of the considered options.

As flagged above, this section relies on research undertaken by the AGRC. The estimates in this research are likely to be underestimated. The estimated prevalence of gambling participation and harms may be underestimated, and several socio-economic costs associated with wagering (and avoided costs associated with wagering advertising restrictions) were unable to be estimated at all, including (but not limited to) crime, additional impacts on work, study and physical and emotional health, and costs to government.

The modelling was also unable to account for those who might stop gambling altogether, nor those who might otherwise commence gambling but do not because of the proposed wagering advertising restrictions.

Further, the modelling reflects a single year impact of wagering advertising restrictions, and as a result, does not capture any long-term benefits to consumers.

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The modelling was also unable to reflect nuances relating to the timing of wagering advertisements which would be impacted by wagering advertising restrictions, and the size of the audience currently exposed to these advertisements (prior to policy reform).

Option 1

This option is likely to see an increase in the volume of wagering advertising and is estimated to have a negative socio-economic impact on Australians.

As noted previously, wagering advertising has decreased significantly since the commencement of the Online Gambling Inquiry (see Table 2 on page 8). This is largely driven by the wagering sector responding to community concerns, however there is a risk that wagering advertising could increase if the government does not intervene.

If wagering advertising increased to its peak levels in 2022, Australians would see a total of 534,023 wagering advertisements on commercial television, 69,483 on metropolitan radio, and 7.25 billion impressions on online platforms. These are significant increases compared to 2024 levels.

An increase in wagering advertising is likely to lead to a continued increase in wagering expenditure and associated harms.

The AGRC research estimated the socio-economic costs of wagering in Australia in 2023 to be $26.7 billion dollars. Table 13 below provides a breakdown of the socio-economic costs by harm domain.

Despite making up just 1.7 % of the total wagering population, moderate and high-risk wagerers account for 60% ($16.1 billion) of the total socio-economic costs of wagering.

The department is unable to estimate the potential increase in wagering harms. However, it is assumed that wagering expenditure and associated harms will continue to grow consistent with the recent trends if the government action is not taken (see Table 1 on page 5).

Table 13: Option 1 – Socio-economic costs for Australians

Harm ($)	Non-risk Wagering	Low-risk Wagering	Moderate-risk Wagering	High-risk Wagering	Total Socioeconomic impact of wagering
Direct wagering expenditure	$2.5 billion	$1.4 billion	$2.2 billion	$1.4 billion	**$7.5 billion**
Health	$2.4 billion	$1.5 billion	$2.3 billion	$2.1 billion	**$8.2 billion**
Relationship Harm	$514.0 million	$301.5 million	$1.5 billion	$3.3 billion	**$5.6 billion**
Psychological Harm	$1.2 billion	$799.5 million	$1.9 billion	$1.1 billion	**$4.9 billion**
Work Harm	$20.0 million	$31.2 million	$91.1 million	$355.5 million	**$497.7 million**
Financial Harm	$16.9 million	$6.1 million	$4.9 million	$9.3 million	**$37.2 million**
Total	**$6.6 billion**	**$4.0 billion**	**$8.0 billion**	**$8.2 billion**	**$26.8 billion**

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Option 2

This option is estimated to have a significant positive impact on the Australian public, including people experiencing or at risk of experiencing gambling harm.

The department estimates this option will deliver a meaningful reduction in the volume of wagering advertising, including 100% reduction on broadcasting and at sports stadiums. This will significantly reduce exposure for children and vulnerable Australians.

It is not possible to estimate the reduction in the volume of wagering advertising on online platforms as this is heavily dependent on the individual. The proposed triple lock function under this option would empower Australian adults to opt out of wagering advertising if it is problematic for them or if they simply do not wish to be exposed to it. This means that some adults will receive no wagering advertisements, while others may receive more than they currently do. Importantly, children's exposure to wagering advertising would be reduced to 0.

This reduction is estimated to lead to a substantial socio-economic benefit for Australians.

Based on the AGRC's research, the department estimates the socio-economic benefit for Australians to be between $117.6 billion and $182.2 billion. Table 14 below provides a breakdown of the socio-economic costs by harm domain for the higher-benefit estimate.

Under this modelling, moderate and high-risk wagering has decreased significantly. Yearly wagering expenditure is estimated to decrease by $82.7 million for these categories, partially offset by an $20.0 million increase is low and no-risk wagering. This is an overall positive as it means more Australians safely participating in wagering activities.

Table 14: Option 2 – Socio-economic costs for Australians

Harm ($)	Non-risk Wagering	Low-risk Wagering	Moderate-risk Wagering	High-risk Wagering	Total Socioeconomic impact of wagering
Direct wagering expenditure	$12.3 million	$7.7 million	-$14.5 million	-$68.2 million	**-$62.7 million**
Health	$18.3 million	$3.1 million	-$4.4 million	-$36.5 million	**-$19.6 million**
Relationship Harm	$2.6 million	$1.2 million	-$3.5 million	-$62.9 million	**-$62.5 million**
Psychological Harm	$5.8 million	$3.0 million	-$5.7 million	-$33.8 million	**-$30.7 million**
Work Harm	$0.2 million	$0.1 million	-$0.2 million	-$6.3 million	**-$6.3 million**
Financial Harm	$0.1 million	$0.03 million	-$0.03 million	-$0.5 million	**-$0.4 million**
Total	**$39.2 million**	**$15.1 million**	**-$28.3 million**	**-$208.1 million**	**-$182.2 million**

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Option 3

This option is estimated to have the most significant positive impact for Australians, and especially those experiencing gambling harm.

This option would deliver a 100% reduction in the volume of wagering advertising across all platforms. Some wagering advertising would remain in limited circumstances, for example in licensed venues or on dedicated racing channels and websites. However, most Australians, particularly children, would see no wagering advertising.

The AGRC estimates this option would see a $332.1 billion socio-economic benefit for Australians, including a $109.5 million reduction in yearly wagering expenditure. Table 15 below provides a breakdown of the socio-economic costs by harm domain.

Similar to Option 2, this option is likely to see a significant reduction in moderate and high-risk wagering activity which will also be partially offset by an increase in low and no-risk wagering. Moderate and high-risk wagering expenditure is estimated to reduce by $136.8 million, while low and no-risk wagering may increase by $27.3 million (with 93% of this increase in the no-risk wagering category.

Table 15: Option 3 – Socio-economic costs for Australians

Harm ($)	Non-risk Wagering	Low-risk Wagering	Moderate-risk Wagering	High-risk Wagering	Total Socioeconomic impact of wagering
Direct wagering expenditure	$25.4 million	$1.9 million	-$17.0 million	-$119.8 million	**-$109.5 million**
Health	$36.9 million	$2.0 million	-$10.8 million	-$64.7 million	**-$36.6 million**
Relationship Harm	$5.4 million	$0.4 million	-$7.4 million	-$111.5 million	**-$113.1 million**
Psychological Harm	$12.0 million	$1.1 million	-$10.5 million	-$63.6 million	**-$61.0 million**
Work Harm	$0.3 million	$0.05 million	-$0.4 million	-$11.2 million	**-$11.3 million**
Financial Harm	$0.2 million	$0.01 million	-$0.04 million	-$0.8 million	**-$0.7 million**
Total	**$80.3 million**	**$5.4 million**	**-$46.2 million**	**-$371.6 million**	**-$332.1 million**

Simplified cost benefit analysis

The following table provides a comparison of the net benefit of Option 2 and 3 to support the decision on the preferred option. Option 1 (status quo) is not included as it does not impose any additional regulatory burden, though it is estimated to have a positive financial impact on industry.

The table seeks to balance the impact on government and industry against the estimated socio-economic costs. On balance, both options would deliver an overall positive impact. This net benefit analysis will inform the decision rule for selecting the preferred option for wagering advertising reform.

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Table 16: Net benefit analysis (per annum)

	Option 2	Option 3
Costs to government	-$10.0 million	-$5.0 million
Industry regulatory burden	-$2.4 million	$0
Industry financial impact	-$66.5 million	-$139.2 million
Wagering industry financial impact	+$3.8 million	+$29.7 million
Socio-economic costs	$182.2 million	$332.1 million
Net benefit	**$107.1 million**	**$217.6 million**

Consultation

Since the release of the final report from the Online Gambling Inquiry in June 2023, the department has undertaken a thorough consultation process with a broad range of stakeholders.

This process, outlined below, followed extensive consultation undertaken by the Senate to inform the final report from the Online Gambling Inquiry. Over the course of the Online Gambling Inquiry, the Committee received 161 submissions, 26 exhibits, and held 13 public hearings. This evidence informed the Committee's recommendations, including with respect to wagering advertising.

While the Committee applied a public health lens to reduce gambling harm across the Australian population, it did not consider the financial impacts on affected sectors (including broadcasting and sports).

To assess the impacts of any wagering advertising reforms, the department undertook 4 primary phases of targeted consultation.

1. **Information Request 1 (July – September 2023).** In response to the Online Gambling Inquiry, the department sought information from broadcasters, digital platforms, sports, wagering, and out-of-home sectors to understand the estimated impacts of the recommended ban.
2. **Information Request 2 (October – November 2023).** In response to Information Request 1, some stakeholders proposed alternative reform options. The department sought further information on the impacts and feasibility of these models and scenarios. The department also sought feedback from a broader range of stakeholders, including racing organisations and harm reduction advocates.
3. **Information Request 3 (December 2023 – January 2024).** The department sought additional information from broadcasting stakeholders on information provided to date, including around the substitutability of advertising and definitions.
4. **Confidential Consultation (August – September 2024).** In collaboration with the office of the former Minister for Communications, the department held confidential meetings with a range of stakeholders on a possible model for wagering advertising reform. This process included consultation with organisations across the harm reduction, academic, sport, broadcasting, publishing, wagering, online, racing, and advertising sectors. Consultation sought feedback from stakeholders on the estimated financial impact and advertising reduction of the model.

Across this process, many stakeholders were hesitant to provide financial information due to commercial sensitivities. This limited the department's ability to obtain representative data to inform the financial impact and reduction in advertising. This information was supplemented with data acquired from third parties, including the Australian Institute of Family Studies, Nielsen, Standard Media Index, and OzTAM.

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Further consultation

Further consultation on the implementation of the recommended option should be undertaken as part of the legislation drafting process to ensure the reforms are fit-for-purpose and do not have any unintended consequences.

Key concerns raised in consultation

Key themes raised across the consultation processes are set out in Table 17. These concerns have been incorporated into the development of this Impact Analysis and the department's consideration of the preferred option.

Table 17: Key themes from consultation

Theme	Description
Live sporting events	• Industry stakeholders were broadly supportive of increased restrictions during live sporting events. • Some stakeholders argued restrictions should start and end 15 or 30 minutes before/after an event, instead of the 60 minutes recommended by the Online Gambling Inquiry. This was largely due to the relevance of programming that is broadcast 60 minutes either side of a sporting event.
Children and young people	• Industry stakeholders were supportive of the intention to provide appropriate safeguards to reduce children and young people's exposure to wagering advertising. Harm reduction advocates noted this has a priority for reform. • Some stakeholders argued for the introduction of a frequency cap to limit children's exposure to wagering advertising. Proposed limits included 3 or 4 per channel per hour, or a daily maximum cap (including for online platforms). • Conversely, harm reduction advocates questioned whether there was a "safe" frequency for children to be exposed to and cautioned the government from appearing to endorse any frequency as such.
Financial impact	• Industry stakeholders (including broadcasters and sports) expressed concern with the financial impact and the unintended consequences. • Specifically, the broadcasters advised the importance of wagering advertising to funding its services, including news and public interest journalism, which are primarily provided free to all Australians. The broadcasters also cited the soft advertising market and overall sustainability concerns for the sector, which is facing structural adjustments amid significant competition from largely unregulated global streaming services. Additional wagering advertising restrictions would compound these issues. • Similarly, the sports stakeholders were concerned that lost wagering revenue would jeopardise the sectors investment in grassroots and community-level sports. They were concerned the impact could be felt across direct sponsorships, wagering product fees (through which each code receives a percentage of bets placed on its matches), and broadcast/streaming rights fees.

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Theme	Description
Substitution of lost revenue	• Both broadcasters and sports stakeholders advised it would be difficult to substitute lost wagering advertising and sponsorship revenue with other advertising revenue. • As noted above, broadcasters are already facing declining advertising revenue and advised they are often not able to sell all available advertising inventory. • Similarly, sports would be unable to easily substitute wagering revenue with another sponsorship category. As sports sponsorships are often exclusive (e.g. only 1 sponsor from each category), sports would not be able to substitute lost wagering revenue from a category that is already represented (e.g. the AFL wouldn't be able to be sponsored by Coles and Woolworths at the same time). Sports stakeholders further advised it is unlikely they could identify new sponsorship categories.
Illegal gambling services	• Some industry stakeholders expressed concerns that banning or further restricting advertising for legal wagering services could lead to consumers being less aware of regulated services and moving towards illegal offshore providers. • Illegal gambling services are potentially more harmful to Australians as they lack equivalent consumer protections and harm reduction measures. They also contribute no taxes or fees to support local industries.
Racing exemption	• The racing and wagering industry expressed their view of racing's intrinsic link to wagering, and the need for it to be treated separately under a regulation model. • Harm reduction and academia were also broadly supportive of the racing exemption, noting its unique and intrinsic links to wagering, however expressed concern that it could be used as a loophole for wagering advertising

Preferred option

Identifying the preferred option

To identify the preferred option, this impact analysis incorporates the likely net benefit (including regulatory burden on industry and socio-economic costs and feedback from consultation). It also gives appropriate weighting to the stated objectives of government, focused on the three previously identified principles:

- Removing wagering advertising during high-risk programming, such as children's and family programming, and live sporting events.
- Breaking the association between sports and wagering, particularly for children and vulnerable people.
- Minimising the saturation and targeting of wagering advertising, particularly for children and young people. This is particularly important for online platforms which offer tools to more precisely target people that may be at risk of gambling harm.

These principles must also be balanced against the need to ensure the financial viability of industry, including the provision of highly valued public goods for which they are providing. It is these considerations which form the decision rule.

Based on this decision rule, Option 2 has been identified as the recommended option.

While the net benefit of Option 3 is higher in Table 16, the difference is largely attributable to the difference in the financial impact and regulatory costs on industry. The net benefit of Option 3 is higher than Option 2 by $95.5 million, however the financial impact and regulatory costs is also higher by $75.1 million.

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During consultation, most stakeholders expressed concern regarding the unintended consequences of wagering advertising reform. Of particular concern was the impact it would have on the provision of local news and grassroots sports.

The stated socio-economic benefits of Option 2 and Option 3 do not include an assessment of the socio-economic costs of any degradation in the provision of public interest journalism on grassroots sport. We are unable to accurately quantify these costs based on the information provided because the impact is unclear as to how both broadcasters and sporting organisations would choose to respond to the financial impact imposed by the options outlined. However, it is imperative that these reforms do not jeopardise the sustainability of the media sector, which has been undergoing structural adjustment, and does not impact the continued provision of public interest journalism, particularly in regional areas.

There is a real risk that, as a result of the financial impact of wagering advertising reforms, media organisations—especially those serving regional communities—may be forced to cut back on news coverage, reduce staff, or even cease providing certain operations altogether. Such outcomes would undermine the availability of trusted sources of information, erode the role of media in holding power to account, and diminish the vibrancy of local news and community storytelling. This would not only compromise the public's access to essential information but could also have flow-on effects for social cohesion, civic engagement, and the representation of regional voices in national discourse. This is not included in the social-economic impacts, nor is it quantifiable based on available information but, ultimately, ensuring the financial viability of the media sector is critical to maintaining the diversity, integrity, and reach of public interest journalism across Australia. Negatively impacting these industries would undermine other measures the government is taking to support the media landscape.

Similarly, there is a real risk the wagering advertising reforms impact the continued investment by broadcasters and wagering companies in grassroots, community and women's sport. Grassroots sporting organisations play a pivotal role in maintaining the foundation of local sports infrastructure and ensuring widespread access to recreational opportunities. By supporting the ongoing operation of local clubs and sporting events, they contribute significantly to public health and overall wellbeing. Support for women's sport is particularly critical, promoting equal opportunities and increasing the visibility of female athletes. Sustained funding in this area encourages participation among girls and women, helping to address longstanding imbalances and support government goals for fairness and diversity in sport. As with public journalism, this is not included in the social-economic impacts, nor is it quantifiable based on available information but has ultimately informed the decision on preferred option.

It should also be noted that the proposed wagering advertising reforms form one part in the government's forward agenda to reduce gambling harm. Other measures taken forward by the government will compound the benefits of any wagering advertising reforms.

In conclusion, while option 3 has a higher net benefit than Option 2, it also imposes a significant financial burden on industry which would significantly impact Australia's grassroots sport and media industry. It does also not account for potential socio-economic costs on public interest journalism and grassroots sports which, anecdotally, can be expected to be higher for Option 3 than Option 2, given the greater financial impact on industry.

Accordingly, the department considers Option 2 achieves an appropriate balance between achieving the three government principles for wagering advertising reform, ensuring the ongoing viability of the media and grassroots sports sectors including the valuable public goods they provide and feedback from consultation.

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Implementation and evaluation

Barriers and risks

The department considered the risks that could prevent the preferred option from meeting its stated objectives, and identified strategies to address and mitigate these risks.

The department identified 3 broad risks that would prevent Option 2 from achieving the costs and benefits estimated in this analysis:

1. Benefits are not achieved as the reforms are not effective in meeting identified policy objectives.
2. Restrictions lead to an increase in illegal offshore wagering activity, in turn leading to increased gambling harm.
3. Costs are higher than estimated as implementation of the restrictions is found to be overly burdensome for industry, resulting in impacts to the provision of public goods.

The department used the management process described in *AS/NZS ISO 31000:2018 Risk Management – Principles and Guidelines*, to consider the likelihood and consequence of these risks.

The likelihood of all 3 risks was assessed as unlikely given the preferred option targets platforms and programs in line with the policy objectives while still enabling licensed wagering operators to advertise in a controlled manner.

Further, while it is possible that the restrictions could impose more of a regulatory burden than estimated, it will be a matter for each business to decide the degree to which they implement the triple lock functionality online. Some businesses may assess the cost of implementing the tool is higher than benefit of displaying wagering advertisements.

The consequence of all 3 risks has also been assessed as moderate to major. If all 3 risks were to come to be realised, it would prevent the benefits of the reforms being realised. However, the department considers the damage would be reversible.

On a risk matrix, this would place these risks as being moderate to high as shown in Figure 3.

Figure 3: Likelihood and consequence risk rating matrix

Likelihood	Negligible 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
5 Almost certain	Moderate	High	Extreme	Extreme	Extreme
4 Likely	Moderate	High	High	Extreme	Extreme
3 Possible	Low	Moderate	High	High	Extreme
2 Unlikely	Low	Moderate	Moderate	High	High
1 Rare	Low	Low	Low	Moderate	Moderate

Consequence

The department also considered a number of controls to reduce the ratings of the identified risks. These controls are set out in Table 18.

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Table 18: Risk management strategies

Risk	Control
Regulation is not effective	Restrictions will be legislated under the IGA (and other relevant Acts) to provide the ACMA with power to pursue strong enforcement actions, such as fines to act as a deterrent. The ACMA will work with industry to develop effective guidelines and advice. It will continue publishing quarterly reports on enforcement actions and investigation outcomes, and targeting interactive gambling as part of its annual Compliance Priorities. A statutory review process will identify if the risks eventuate and whether the treatments remain appropriate.
Regulation results in unintended consequences	
Regulation costs outweigh the benefits	The ACMA will work with industry to implement the reforms. A statutory review process will identify if the costs of regulation have contributed to a reduction in the provision of public goods.

Implementation and commencement timings

Legislation will be required to implement the preferred option. The department recommends implementation through the IGA, with likely consequential amendments to the BSA, the *Australian Communications and Media Authority Act 2005* (ACMA Act) and the co-regulatory broadcasting codes of practice also required.

The preferred option should be implemented as soon as practical to address community concerns. However, it is difficult to predict Parliamentary timings.

The department recommends implementing all restrictions in a single phase. Consistent with similar reforms, a transitory period should be provided from the day after Royal Assent to enable affected stakeholders to prepare for the new legislative obligations.

The ACMA will have responsibility for monitoring and enforcing compliance with the proposed restrictions.

As outlined previously, the ACMA is best placed to take on this role given its existing remit with respect to wagering, broadcasting and online services.

The potential risks associated with implementation include opposition from some sectors of the industry and the complexity of implementing effective regulations in a rapidly evolving technological landscape. The possibility of industry opposition exists, given concerns about additional regulatory burdens and operational flexibility. The consequences could involve resistance to compliance, affecting the success of the reforms.

The ACMA will employ a collaborative approach, engaging in regular and transparent communication to address stakeholder concerns constructively to mitigate industry opposition.

Evaluation process and timings

Following implementation of the preferred option, the department and the ACMA will monitor and evaluate trends in the wagering advertising landscape to ensure the reforms have been effective. This evaluation will be an integral part of the ACMA's ongoing compliance activities. An evaluation plan could be developed to the shared arrangements between the department and the ACMA.

This evaluation process would involve assessing the volume of wagering advertising across a range of platforms to determine the degree to which overall volume has decreased. The evaluation would also focus on children and young people as this has been identified as a particular concern and is one of the policy objectives of reform.

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Evaluation would be ongoing to assess the degree to which the reforms have achieved the short-, medium- and long-term objectives outline in this document. The department would use a variety of data sources, including from industry and research bodies, to determine the effectiveness.

Success would be measured in the long-term against pre-reform data, including with respect to the number of complaints lodged with the ACMA, the number of breaches of the rules, community sentiment as expressed in surveys and research, rates of gambling harm, and the prevalence of key indicators (including the number of children betting, intending to bet, or able to quote the odds).

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Appendix A – Glossary of key terms

Term	Definition
'Above the line' advertising	Refers to mass media promotion intended to reach a large audience. Includes advertising on television, radio, billboards etc.
ACMA	Australian Communications and Media Authority
ACMA Act	*Australian Communications and Media Authority Act 2005*
Advertisement	Any writing, still or moving picture, sign, symbol or other visual image, or any audible message, or any combination of 2 or more of those things, that give publicity to, or otherwise promotes or is intended to promote a company, product, or feature.
AGRC	Australian Gambling Research Centre
BSA	*Broadcasting Services Act 1992*
Gambling promotional content	Means advertising content, sponsorship content, or promotional content that relates to a gambling service.
Gambling service	Gambling service means: a) a service for the placing, making, receiving or acceptance of bets; or b) a service the sole or dominant purpose of which is to introduce individuals who wish to make or place bets to individuals who are willing to receive or accept those bets; or c) a service for the conduct of a lottery; or d) a service for the supply of lottery tickets; or e) a service for the conduct of a game, where: i. the game is played for money or anything else of value; and ii. the game is a game of chance or of mixed chance and skill; and iii. a customer of the service gives or agrees to give consideration to play or enter the game; or a gambling service (within the ordinary meaning of that expression) that is not covered by any of the above paragraphs.
Inducement	Refers to any offer to persuade engaging in gambling activity, to bet more frequently, or in a riskier manner.
IGA	*Interactive Gambling Act 2001*
Triple lock	Refers to a regulatory setting for online platforms and applications where users are signed in, confirmed to be over 18 and have the option of opting out
Wagering advertising	Used in this Impact Analysis to refer to any gambling promotional content for a wagering service.
Wagering service	Wagering service means a service covered by paragraph (a) or (b) of the definition of gambling service.

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Appendix B - Full list of stakeholders consulted

Stakeholder Group	List of Stakeholders
Broadcasters	Australian Narrowcast Radio Association (on behalf of its members) Commercial Radio & Audio (on behalf of its members) Foxtel Free TV Australia (on behalf of its members) Nine Entertainment Co Paramount ANZ (Channel 10) Seven West Media Southern Cross Austereo (SCA) Special Broadcasting Service (SBS) Sports Entertainment Network (SEN) WIN Television
Harm reduction advocates	Alliance for Gambling Reform (AGR) Australian Medical Association (AMA) Australian Psychological Society Children and Media Australia (CMA) Financial Counselling Australia (FCA) Gambling Harm Lived Experience Experts (GHLEE) Monash Addiction/Turning Point National Aboriginal Community Controlled Health Organisation (NACCHO) Relationships Australia Wesley Mission
Academics	Associate Professor Dr Charles Livingstone Emeritus Professor Mike Daube Professor Dan Lubman AM Professor Samantha Thomas
Online	Amazon Apple Digital Industry Group Inc. (DIGI) Disney/ESPN Google Interactive Advertising Bureau (IAB) (on behalf of its members) Meta Netflix Snap TikTok
Outdoor	Outdoor Media Association (on behalf of its members)
Racing and breeding	Australian Trainers Association

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Stakeholder Group	List of Stakeholders
	Canberra Racing
	Greyhound Racing NSW
	Greyhound Racing SA
	Greyhound Racing Victoria
	Greyhounds Australasia
	Harness Racing Australia
	Harness Racing SA
	Harness Racing Victoria
	NSW Greyhound Breeders Owners and Trainers' Association
	Racing and Wagering Western Australia
	Racing Australia
	Racing NSW
	Racing Queensland
	Racing SA
	Racing Victoria
	Tasracing
	Thoroughbred Breeders Australia
	Thoroughbred Racing Northern Territory
Sports	Australian Football League (AFL)
	Coalition of Major Professional and Participation Sports (COMPPS)
	Cricket Australia
	Football Australia
	National Rugby League (NRL)
	Rugby Australia
	Tennis Australia
Wagering	Australian Bookmakers Association (ABA)
	Betfair/Crown Resorts
	Betr (Blue Bet)
	Dabble
	Entain
	PalmerBet
	PointsBet
	Racing and Wagering Western Australia
	Responsible Wagering Australia (on behalf of its members)
	Sportsbet
	Tabcorp
Publishing	News Corp Australia

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Appendix C - Current advertising restrictions

The rules that relate to the scheduling of advertising and content are set out in a number of co- and self-regulatory codes of practice.

Co-regulatory – Broadcasting codes of practice

The *Broadcasting Services Act 1992* (BSA) enables television and radio broadcasters to develop codes of practice that are applicable to the broadcasting operations for the specified broadcasting sector. Commercial radio and television, community radio and television, subscription television, and the ABC and SBS have each developed codes of practice for their sector.

The co-regulatory codes for each sector are developed in consultation with the Australian Communications and Media Authority (ACMA) and are periodically reviewed to ensure that they continue to reflect community standards. The ACMA maintains a register of all the codes of practice on its website.

The broadcasting codes include rules relating to the amount, scheduling and placement of advertising as relevant to each sector. For example, the Commercial Television Code of Practice specifies hourly limits for advertising on its primary and multi-channels, including:

- on average no more than 13 minutes between 6:00 pm and midnight outside election periods; and
- on average no more than 14 minutes between 6:00 pm and midnight in election periods (provided that on average no more than 13 minutes per hour comprises advertising that is not political matter).

There are no specific limits to the amount of gambling advertising that can be broadcast each hour.

There are no limits to the amount of advertising on commercial radio and subscription television. These codes do require that advertisements be easily identifiable and that they consider the intellectual and emotional maturity of the intended audience.

The codes include procedures for dealing with complaints. In the first instance, complaints about matters covered by a code must be submitted in writing to the relevant broadcaster within 30 days of the broadcast at issue. If a complainant has not received a response within 60 days, or the complainant is not satisfied with the response provided, then they may refer the matter to the ACMA.

Self-regulatory – Advertising content codes of practice

The content of advertisements is primarily regulated by the codes of practice developed by the Australian Association of National Advertisers (AANA) and administered by Ad Standards. These codes are platform-neutral and include the AANA Code of Ethics, the AANA Wagering Advertising Code, and the AANA Children's Advertising Code.

The AANA Code of Ethics applies to most advertising, including relevant online advertising, and contains a range of provisions relating to taste and decency, including that advertising shall not depict material contrary to prevailing community standards on health and safety.

Complaints about the content of gambling advertisements, including gambling advertisements, can be directed in writing to Ad Standards for consideration by the Ad Standards Community Panel (the Panel).

Gambling advertisement restrictions

The broadcasting codes of practice include rules for the placement and scheduling of gambling advertisements, including restrictions around children's programs and live sporting events. The new rules, made in 2018, supplemented existing gambling advertising restrictions during live sport on broadcasting services and introduced new rules for online services in acknowledgement of community concerns that

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regular exposure to gambling advertisements during live sport could normalise gambling in the eyes of children.

In a 2019 analysis, the ACMA found that broadcasters were compliant with the new rules, which resulted in a marked decrease in the volume of gambling advertising during the regulated hours and live sports. However, the report showed that advertisements increased in other types of programming where relevant restrictions do not apply.

Gambling advertisements during children's programs

Additional sets of regulatory standards and codes apply to restrict advertising and marketing to children.

Where applicable, the broadcasting codes of practice include restrictions around the placement of advertisements during children's programs. For example, the Commercial Television Industry Code of Practice states that gambling advertisements must not be broadcast:

- in any program classified G or lower between:
    - 6:00 am and 8:30 am; and
    - 4:00 pm and 7:00 pm; and
- during any program that is broadcast between 5:00 am and 8:30 pm and principally directed to children.

These prohibitions do not apply to advertisements broadcast in a news, current affairs or sports programs during those time periods. They also do not apply to advertisements relating to things such as government sanctioned lotteries, keno or contests, or to advertisements for entertainment or dining facilities where gambling may take place.

The Subscription Television Code of Practice states that the intellectual and emotional maturity of the intended audience must be considered when scheduling advertisements relating to betting or gambling and advertising within a block or blocks of programming directed at children.

Additionally, commercial broadcasters must adhere to the Broadcasting Services (Australian Content and Children's Television) Standards 2020 which includes protections for child viewers. While this does not include specific gambling restrictions, it does impose maximum advertising limits during programs classified C (Children) and rules around the use of popular characters in advertisements. The ACMA has responsibility for this standard.

Additionally, broadcasters and online services are not permitted to promote any gambling content that is socially irresponsible. The AANA Wagering Advertising and Marketing Communications Code has rules about the content of advertisements for betting services.

The AANA Wagering Code states that gambling advertisements must not:

- be directed primarily to minors;
- depict a person aged 18-24 years old engaged in wagering activities;
- state or imply a promise of winning; or
- state or imply a link between wagering and sexual success or enhanced attractiveness.

The AANA Wagering Code also provides that gambling advertising must not portray, condone or encourage:

- wagering in combination with the consumption of alcohol;
- participation in wagering activities as a means of relieving financial or personal difficulties;
- excessive participation in wagering activities; or
- peer pressure to wager.

Ad Standards is responsible for compliance matters under this regime.

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Gambling advertisements during live sport events

The broadcasting codes of practice restrict gambling promotions, at the noted time periods, during the live coverage of sporting events. These restrictions apply to most broadcasters, including commercial radio and television, subscription television, and the SBS. These rules do not apply to telephone betting services, pay-per-view broadcasting, and subscription television sports channels with a low audience share.

The rules for live sport differ depending on whether the broadcast coverage of the sport is provided between 5:00 am and 8:30 pm or between 8:30 pm and 5:00 am.

Between 5:00 am and 8:30 pm

- gambling advertising is prohibited from five minutes before the scheduled start of play until five minutes after conclusion of live coverage of play
- the promotion of betting odds is prohibited from 5 minutes before play until 5 minutes after play.
- the promotion of betting odds by commentators is prohibited from 30 minutes before play until 30 minutes after play.

Between 8:30 pm and 5:00 am

- gambling advertising and the promotion of odds is not permitted during play
- gambling advertising is permitted before and after play and during scheduled and unscheduled breaks
- the promotion of betting odds is permitted only before and after play, not in scheduled breaks
- the promotion of betting odds by commentators is prohibited from 30 minutes before play until 30 minutes after play.

At all times

- gambling advertising and promotion of betting odds during a live sporting event must be accompanied by a responsible gambling message
- gambling advertising must be socially responsible and not mislead the audience; not be directed to children; portray children as participating in betting or gambling; portray betting or gambling as a family activity; make exaggerated claims; promote betting or gambling as a way to success or achievement; or associate betting or gambling with alcohol.

Long-form live sporting events

- broadcasters must not show gambling advertising from 5 minutes before the start of the first event of the day until 8:30 pm when airing a long form live sporting event.
- after 8:30 pm gambling ads are permitted in accordance with rules applicable to the long-form event, for example during the Olympics, between each day, twilight and night session and not more than once every two hours as part of a distinct break of at least 90 seconds
- after 8:30 pm a promotion of betting odds by persons other than commentators is permitted during play as part of a distinct break of 90 seconds and in accordance with rules applicable to the long-form event, for example, during the Olympic Games not more than once every 3 hours on each day of competition.

The Broadcasting Services (Online Content Services Provider Rules) 2018 replicate the restrictions on gambling advertising during live sport in the broadcasting codes and include requirement for the keeping of records that must be provided to the ACMA upon request.

The Online Rules apply to any online content service that provides live coverage of sporting events. This includes but is not limited to:

- broadcaster's online services or Broadcast Video On Demand (BVODs) providing online streamed content related to their broadcast content
- subscription video on demand services (SVODs) providing streaming services for a range of sports
- social networking services providing live coverage of sporting events.

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The ACMA is responsible for compliance matters under both regimes.

Gambling advertisements for illegal interactive gambling services

Part 7A of the *Interactive Gambling Act 2001* prohibits the advertising of prohibited or unregulated interactive gambling services on television, radio, in published material, and online to Australian audiences. This includes online casino-style gaming services (such as online blackjack, online poker, online roulette) and online betting services that accept in-play betting on sports events.

It means that websites designed for a specifically Australian audience will not be able to carry interactive gambling advertisements. There are exceptions, including political advertising, incidental or accidental advertising, and advertising in imported print publications or websites that are not aimed specifically at an Australian audience. The ACMA is responsible for monitoring compliance with this restriction.

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Appendix D – Summary of the AGRC research

The department commissioned the Australian Gambling Research Centre (AGRC) to analyse available data to estimate the potential socio-economic benefit of options for wagering advertising reform. This included benefits to wagerers, affected others, the community and government.

The AGRC was established under the Commonwealth *Gambling Measures Act 2012*. Its gambling research program reflects the Act, embodies a national perspective and has a strong family focus. Its work forms part of the functions of the Australian Institute of Family Studies (AIFS).

The AGRC provided its final report to the department on 18 July 2024. It has been used by the department to provide an estimate of the benefit to Australians in this Impact Analysis. While the report has not been published, this section provides a summary of the options considered, the methodology used, the key findings, and limitations with the analysis.

Options considered

The AGRC report considered 3 options for wagering advertising reform informed by the Online Gambling Inquiry.

Option A comprised a package of measures broadly in line with Phase 1 and Phase 2 of the Online Gambling Inquiry's recommendation and assumed an advertising reduction of:

- 100% on online platforms, including social media
- 28% on television, including associated streaming services
- 25% on radio
- 80% through betting affiliates

Option B comprised a strengthened package of measures in line with the Online Gambling Inquiry, particularly with respect to television, which assumed an advertising reduction of:

- 100% on online platforms, including social media
- 49% on television, including associated streaming services
- 23% on radio
- 80% through betting affiliates

Option C comprised a full ban as recommended by the Online Gambling Inquiry, which assumed a 100% advertising reduction across all platforms.

Methodology

The total cost of wagering in Australia was estimated first, to derive the benefit of the wagering advertising reform options.

It is important to note that in this report the costs of wagering mean the costs of wagering loss and monetised value of wagering harms. The term does not mean the costs of providing wagering services.

Outlined below are the steps that were taken to estimate the socio-economic costs of wagering in Australia (steps 1 to 2) and the benefits (cost savings) due to the proposed wagering advertising ban (steps 3 to 5).

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Estimate the socio-economic costs of wagering in Australia		Estimate the benefits/cost savings		
1. Estimate how many wagerers are categorised in non-risk, low-risk, moderate-risk and high-risk gambling in Australia (4PGSI categories).	2. Estimate the total cost of wagering in Australia.	3. Estimate how many days wagering per year the proposed wagering advertising ban can reduce in each PGSI category.	4. Estimate how much the reduction in days wagering per year in each PGSI category generates in costs saving.	5. Calculate net cost savings (benefit) from all four PGSI categories.

The costs associated with wagering harm were disaggregated in to 4 at-risk gambling categories as measured by the Problem Gambling Severity Index (PGSI): non-risk, low-risk, moderate-risk and high-risk (problem) gambling.

Findings

The AGRC report found the total cost of wagering in Australia for 2023 was $26.7 billion, with the following estimated socio-economic benefits for each option considered:

- Option A – $117.6 million
- Option B – $182.2 million
- Option C – $332.1 million

The report provides evidence that a reduction in wagering advertising could mitigate some harmful effects associated with wagering and generate a socio-economic benefit in Australia.

The AGRC also concluded the extent to which the proposed reduction in wagering advertising is sufficient to mitigate harmful effects should be subject to monitoring and evaluation, including (based on international experience) monitoring of the wagering industry's strategies to navigate the ban (e.g. increase in direct messaging) to inform need for further adjustments of the phased approach.

Limitations

The AGRC notes the estimates in its report are likely to be an underestimate of socio-economic benefits due to limitations in available data and methodology. These limitations include:

- The data sources used for this analysis (HILDA, NGTS, CAS and H2 Gambling Capital data) all have different populations and sampling methods, which introduces a lack of consistency.
- The prevalence of gambling and gambling harms in the HILDA data may be an underestimate compared to other prevalence studies – for example, the prevalence of wagering in HILDA is 8%, whereas a 2019 national gambling prevalence study with a sample of 15,000 Australian adults representative of the population found the prevalence of race betting to be 16.8% and sports betting 9.6%.
- Given estimates of the cost of wagering and the socio-economic benefits from a wagering advertising ban were estimated to the prevalence figures from HILDA, both are likely underestimates.
- Due to limitations of the data, several socio-economic costs related to harm associated with wagering (and therefore benefits due to a wagering advertising ban) were unable to be estimated. These include crime (legal costs, cost to business), costs of job loss and job change, productivity loss for study (unable to complete a degree for example), emotional costs after separation, suicide (ideation, attempt, completion), debt prior to bankruptcy, loss of assets, physical health (e.g. loss of sleep), tobacco use, IPV

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and domestic violence, the cost to the health system, and the cost to governments at all levels (e.g. justice system).

- Due to data limitations, costs and benefits associated with those who started or stopped wagering due to the ban were not estimated.
- This study only estimated the short-term impacts of a partial wagering advertising ban.
- The proposed plan ruled out restricting wagering advertising through direct messaging, which the researchers found was a significant and strong predictor in wagering participation.

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FOI 27-145- Document 3

Interactive Gambling Amendment (Gambling Reform) Bill 2026

Submission on Exposure Draft

PUBLIC | Version: 1 | Date: 12/05/2026

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FOI 27-145- Document 3

Executive Summary

Wesley Mission and the Alliance for Gambling Reform welcome the opportunity to provide feedback on the Exposure Draft of the *Interactive Gambling Amendment (Gambling Reform) Bill 2026*.

Wesley Mission and the Alliance for Gambling Reform are committed to reducing gambling harm in Australia and supporting those affected by it. Wesley Mission provides direct support to thousands of Australians experiencing gambling harm each year and brings frontline insight into the real-world impacts of gambling. The Alliance for Gambling Reform is a national advocacy organisation working to reduce the alarming level of gambling harm by partnering with community organisations and local councils, advocating for stronger laws and rules, and amplifying the voices of those impacted. It does not seek to ban gambling, but to minimise harmful industry practices.

Our submission is underpinned by the position that all 31 recommendations of the House of Representatives Standing Committee of Social Policy and Legal Affairs Committee report, *You win some, you lose* more (the Murphy Report), informed by extensive evidence and the voices of lived experience, should be adopted and implemented in full.

The Prime Minister stating he had three clear goals in relation to these reforms: to break the connection between wagering and sport; to minimise children's exposure to wagering advertising; and to reduce the saturation of gambling advertising across the internet, radio and TV channels. This Bill does not meet these goals.

We recognise the Government's intent to strengthen protections through advertising restrictions, improvements to BetStop, and measures targeting offshore operators. These are important steps. However, the Bill, as currently drafted, does not go far enough to meaningfully reduce, or indeed prevent gambling harm in Australia. The evidence is clear that stronger, more comprehensive reform is both necessary and achievable.

In several areas, the Bill risks weakening existing protections. It permits gambling advertising during breaks in live sport after 8:30pm, despite current rules prohibiting such ads entirely; it relies on opt-out models for online advertising that place the burden on individuals; and it allows continued high volumes of advertising that sustain harmful exposure. These settings are inconsistent with the stated policy intent and with evidence showing that saturation and normalisation drive gambling participation and harm—particularly among children and young people.

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FOI 27-145- Document 3

This submission identifies four critical gaps in the current Bill where reform is essential and makes recommendations on amendments and implementation: advertising, inducements, duty of care and mandated pre-commitments.

Australia's current approach remains fragmented and overly reliant on individual responsibility. Stronger, systemic reform is both necessary and achievable. Strengthening this Bill in line with the evidence-based recommendations outlined in this submission would better align it with its objective: to reduce gambling harm and protect the wellbeing of Australians.

Yours sincerely,



s47F

Rev. Stu Cameron

CEO & Superintendent
Wesley Mission



s47F

Martin Thomas

CEO
Alliance for Gambling Reform

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FOI 27-145- Document 3

Contents

1. Summary of Recommendations....4
1. Advertising....6
2. Inducements....10
3. Duty of Care....11
4. Mandated pre-commitment and affordability checks....13
5. Other Considerations....14
6 Conclusion....15

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FOI 27-145- Document 3

1. Summary of Recommendations

Advertising

Wesley Mission and the Alliance for Gambling Reform recommends that the Bill be strengthened to deliver a genuine, evidence-based reduction in Australians' exposure to gambling advertising — including a legislated pathway to a full ban, the correction of provisions that would weaken existing protections, and the replacement of opt-out models with opt-in frameworks online.

#	Recommendation
1.1	Amend the Bill to include a statutory pathway to a full prohibition on all gambling advertising across all platforms — broadcast, digital, venue, and sponsorship — within three years of commencement.
1.2	Insert a requirement for independent reviews at 18 and 30 months after commencement, with a statutory obligation to escalate restrictions (including to a full ban) if a measurable reduction in gambling harm has not been achieved.
1.3	Amend s 62L(2) to maintain the existing prohibition on gambling advertising during scheduled and unscheduled breaks in live sport after 8:30pm. As drafted, the Bill removes an existing protection. The amendment should ensure the Bill does not weaken the status quo for evening sport.
1.4	Replace the online opt-out model (s 62P(3)) with an opt-in requirement — gambling advertising should only be delivered to users who have actively elected to receive it. At minimum, the "reasonable steps" exception should be narrowed with ACMA-mandated standards that prevent default exposure.
1.5	Narrow the dedicated racing and wagering channel exemptions (ss 62E, 62M(3), 62N(3), 62P(5)) to ensure they cannot be used to circumvent the intent of the restrictions — for example, by rebranding mainstream sport content as "wagering" programming.
1.6	Amend s.62F to state that if anyone receives direct or affiliate payment from promoting a wagering product, they are deemed an “influencer”, and the prohibition applies regardless of audience size.

Inducements

Wesley Mission and the Alliance for Gambling Reform recommends that the Bill be strengthened to prohibit all gambling inducements — the bonuses, "free bets," odds boosts, and loyalty incentives that independent research shows drive riskier gambling behaviour, particularly among those already at risk of harm.

#	Recommendation
2.1	Insert a new Division prohibiting all gambling inducements offered to persons in Australia — including sign-up bonuses, "free bets," odds boosts, cashback offers, and VIP/loyalty incentives linked to wagering activity.
2.2	Include a regulation-making power enabling the Minister to prescribe additional forms of inducement, ensuring the legislation can respond to emerging industry practices without requiring amendment.

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FOI 27-145- Document 3

Duty of Care

Wesley Mission and the Alliance for Gambling Reform recommends that the Bill be strengthened to impose a statutory duty of care on licensed wagering operators, requiring them to identify and respond to gambling harm — rather than relying on individuals to self-identify — and making compliance an enforceable condition of licence.

#	Recommendation
3.1	Introduce a statutory duty of care requiring licensed interactive wagering service providers to take all reasonable steps to prevent and reduce gambling harm — including maintaining harm-identification systems, intervening where indicators are present, and training staff in harm recognition and response.
3.2	Make compliance with the duty of care a condition of licence, enforceable through the existing licensing framework with the ultimate sanction of licence revocation for persistent non-compliance.

Pre-commitment and Affordability

Wesley Mission and the Alliance for Gambling Reform recommends that the Bill be strengthened to move beyond reactive self-exclusion and require mandatory, account-level pre-commitment controls and affordability checks — preventative measures that the international evidence shows are significantly more effective at reducing harm than voluntary alternatives.

#	Recommendation
4.1	Require operators to mandate account-level deposit and net loss limits — set by the customer before any wager is accepted — on a daily, weekly, or monthly basis.
4.2	Prohibit operators from allowing a customer to increase a deposit or loss limit in less than 72 hours, to prevent impulsive escalation during moments of high risk.
4.3	Require operators to conduct mandatory affordability assessments where a customer's net losses exceed a prescribed threshold or their activity patterns indicate a risk of harm, with mandated intervention (limit reduction, account suspension, or other prescribed action) where harm risk is identified.

Other Considerations

#	Area	Recommendation
5	National Regulator	Commit to establishing a national gambling regulator and ombudsman, with a clear timeline and process (separate legislation).
6	Harm Reduction Levy	Introduce a levy on licensed wagering providers to structurally fund gambling harm prevention, treatment, and research.
7	Offshore Enforcement	Strengthen Schedule 2 by establishing a publicly accessible register of prohibited operators, introducing proactive ISP-level blocking

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FOI 27-145- Document 3

		obligations, and dedicating resources to monitoring offshore advertising through social media influencers.
8	Data Transparency	Mandate standardised, public reporting by licensed operators on aggregate customer losses, harm indicators (including account suspensions and self-exclusion referrals), and complaint volumes and outcomes.
9	National Harm Reduction Strategy	Develop a comprehensive national strategy on gambling harm reduction grounded in public health principles, including a national Social Cost of Gambling study.

1. Advertising

1.1. What the Bill does

1.1.2 The Exposure Draft introduces a new Part 7C of the *Interactive Gambling Act 2001*, establishing advertising caps, time-based bans, platform controls, venue and uniform prohibitions, and restrictions on celebrity endorsements and odds promotion.

1.2 What the evidence shows

1.2.2 Advertising drives gambling participation and harm — the evidence is unambiguous.

1.2.3 The Australian Institute of Family Studies (AIFS) found that around three-quarters (78%) of Australian adults are exposed to wagering advertising at least once a week, with two in five (41%) exposed four or more times a week. Among those exposed weekly, there were significantly higher rates of gambling participation and risk of harm. Critically, 21% of people were prompted to start betting for the first time after seeing an ad; 34% increased the amount they bet; and 29% placed bets on impulse. Young people (18–34) and those already at risk of harm were significantly more likely to report that advertising changed their behaviour.[1]

1.2.4 The first comprehensive Australian study of children's exposure to gambling advertising found that an average of 374 gambling ads were broadcast per day on Australian free-to-air TV — approximately five times the number of alcohol ads. Two-thirds aired during the day, when large numbers of young people were watching. Among younger age groups, children aged 0–12 had the most exposure. The study concluded that the existing Commercial Television Industry Code of Practice had failed to protect children.[2]

[1] Australian Gambling Research Centre. (2023). *Exposure and impact of sports and race betting advertising in Australia*. Melbourne: Australian Gambling Research Centre, Australian Institute of Family Studies.
[2] O'Brien, K & Iqbal, M 2019, Extent of, and children and young people's exposure to, gambling advertising in sport and non-sport TV, Victorian Responsible Gambling Foundation, Melbourne

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FOI 27-145- Document 3

1.2.5 Research by the Australia Institute (March 2025) found that almost one in three (30%) of 12–17-year-olds are already gambling, increasing to almost half (46%) of 18–19-year-olds — and these habits persist into adulthood.[3]

1.2.6 The Victorian Gambling and Casino Control Commission has confirmed that research consistently shows seeing gambling ads increases young people's interest in betting, and that when gambling seems normal, young people are more likely to try it.

1.3 Why the Bill's approach falls short

1.3.2 Despite the evidence, the Exposure Draft still permits a substantial volume of gambling advertising.

1.3.3 Television: Up to three gambling advertisements per hour remain permissible between 6:00am and 8:30pm on any channel (s 62M). When 374 gambling ads per day were already identified as harmful, capping at three per hour does not constitute a meaningful reduction — it institutionalises ongoing exposure.

1.3.4 Live sport after 8:30pm: Section 62L prohibits gambling advertising during live sport overnight (8:30pm–6:00am), but — critically — the prohibition during scheduled and unscheduled breaks is *removed* after 8:30pm (s 62L(2)). Under the current regulatory settings, gambling ads are banned during live sport regardless of time of day. The proposed reform would therefore remove an existing protection after 8:30pm. O'Brien and Iqbal's research showed a large number of children and young people watch sport beyond 8:30pm. A reform that weakens protections during prime-time evening sport cannot credibly be described as a harm-minimisation measure.

1.3.5 Online: Gambling advertising online is not banned. Section 62P provides an exception where the online content service provider takes "reasonable steps" to prevent access by restricted users and allows registered adult users to "opt out" (s 62P(3)). This is an opt-out model, not a ban. Behavioural research consistently shows that most people never change default settings. The burden is placed on individuals — including parents — rather than on government and industry.

1.3.6 Dedicated racing and wagering channels/services are entirely exempted from the advertising frequency caps, the radio restrictions, and the online prohibitions (ss 62E, 62M(3), 62N(3), 62P(5)).

1.3.7 Influencers: The definitions of “notable person” and “influencer” in s.62F require clearer definitions to remove loopholes and ensure a safer online environment for young people. It is important that “influencers” are not defined solely by their reach or follower counts. Micro-influencers are increasingly used by the gambling industry as they often have highly engaged followings.

[3] The Australia Institute. (2025) *Teenage gambling in Australia*, The Australia Institute, viewed 8 June 2026, australiainstitute.org.au.

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FOI 27-145- Document 3

1.4 International lessons

1.4.2 Italy introduced a blanket ban on all forms of gambling advertising in 2018 under the *Decreto Dignità*. The ban was the most far-reaching intervention in the European gambling sector. However, several years on, the evolution of digital platforms has revealed structural limitations in a model that was not designed for the digital environment — particularly around tipsters, influencers, and affiliate marketing.

1.4.3 The lesson for Australia is clear: if you are going to restrict gambling advertising, the framework must be comprehensive and digitally literate from the outset. A partial restriction that leaves digital and opt-out loopholes will be rapidly circumvented.

1.4.4 France's 2023 influencer law removed follower thresholds entirely — if you are paid to promote or receive affiliate income, you are deemed an influencer, and the rules apply regardless of audience size. We endorse this definition as being most effective to regulate the changing and nuanced landscape of social media content.

1.5 Recommended amendments

1.5.2 We recommend a two-part structural amendment to Schedule 1 of the Bill, plus three targeted amendments to specific provisions.

1.5.3 Amend s.62F to state that if anyone receives direct or affiliate payment from promoting a wagering product, they are deemed an "influencer", and the prohibition applies regardless of audience size.

Statutory pathway to a full ban (Rec 1.1)

1.5.4 Insert a new section (e.g., s 62ZG) in Part 7C, Division 5, requiring:

The Minister must, by legislative instrument, make rules providing for a phased prohibition on all wagering advertising content across all broadcasting services, datacasting services, online content services, sporting venues, and uniforms, to take full effect no later than three years after the commencement of this Part.

This amendment preserves the Government's immediate restrictions as a first phase, while embedding a full prohibition as the statutory endpoint — with a three-year transition period to allow industry adjustment.

1.6 Independent review trigger (Rec 1.2)

Insert a new section (e.g., s 62ZH) requiring:

(1) The Minister must cause an independent review of the operation and effectiveness of this Part to be undertaken and completed no later than 18 months, and again no later than 30 months, after commencement.

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FOI 27-145- Document 3

(2) Each review must assess whether the restrictions have achieved a measurable reduction in gambling harm, with particular reference to: (a) exposure of children and young people; (b) rates of gambling participation and harm indicators; and (c) the adequacy of restrictions to achieve the objects of this Act.

(3) If a review finds that the restrictions have not achieved a measurable reduction in gambling harm, the Minister must, within 6 months of receiving the review, make rules under section 62ZG escalating restrictions, including to a full prohibition.

This creates accountability, embeds evidence-based review, and provides a statutory ratchet toward stronger protections if the initial measures prove insufficient.

1.7 Fix the 8:30pm live sport loophole (Rec 1.3)

1.7.2 Section 62L(2) currently provides that during scheduled and unscheduled breaks in live sport after 8:30pm, content is *not* taken to be in conjunction with live coverage. This is weaker than the current regulatory position, under which gambling advertising is banned during live sport regardless of time.

1.7.3 We recommend amending s 62L(2) to align with s 62K(2) — that is, content during breaks should be treated as content in conjunction with live coverage at all times. This is not an enhancement; it is a correction to ensure the Bill does not inadvertently remove an existing protection.

1.8 Replace opt-out with opt-in online (Rec 1.4)

1.8.2 The "reasonable steps" exception in s 62P(3) creates an opt-out model for online gambling advertising. Behavioural research consistently demonstrates that defaults determine outcomes — most users never change default settings.

1.8.3 Wesley Mission and the Alliance for Gambling Reform recommends replacing the opt-out model with an opt-in requirement: gambling advertising should only be served to users who have actively elected to receive it. At minimum, the ACMA should be required (not merely empowered) to set mandatory standards under s 62P(4) that prevent default exposure to wagering advertising content.

1.9 Narrow the dedicated channel exemptions (Rec 1.5)

1.9.2 The exemptions for dedicated racing and wagering channels, programs, and online content services (ss 62E, 62M(3), 62N(3), 62P(5)) are broadly drafted. The test is whether content "wholly or principally relates to" racing or wagering (s 62E(1)). Without tighter parameters, there is a risk that operators or broadcasters restructure programming to qualify as "dedicated" wagering content — for example, by wrapping mainstream sport coverage in a wagering-branded program format.

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FOI 27-145- Document 3

1.9.3 We recommend the ACMA be given an express power to revoke a "dedicated" determination where it is satisfied the exemption is being used to circumvent the restrictions, and that the Minister's public interest test in s 62E(3) and (6) be expanded to require consideration of harm-minimisation objectives.

2. Inducements

2.1. What the Bill does

2.1.1. The Exposure Draft focuses on advertising format and placement. It does not directly prohibit inducements — the bonuses, free bets, odds boosts, VIP incentives, and promotional offers that wagering operators use to recruit and retain customers.

2.2. What the evidence shows

2.2.1. Inducements cause people to gamble more, take bigger risks, and make worse decisions — and the effect is strongest for those already at risk.

2.2.2. A landmark 2025 study by the Economic and Social Research Institute (ESRI) in Ireland — the first controlled experiment of its kind — tested the effect of promotional offers on 622 men under 40 during the Euro 2024 tournament. Those exposed to inducements (free bets, money-back guarantees) spent 10% more on betting and were significantly less likely to abstain**,** with the number of non-bettors nearly cut in half. More alarmingly, participants in the inducement group were three times more likely to place money on deliberately poor-value bets. Despite being regular bettors, many participants were unaware that the stake is not returned on a free bet.

2.2.3. Experimental research confirmed that wagering incentives cause gamblers to select significantly riskier (longer odds) bets than unincentivised bets. The "better odds/winnings" inducement was the most attractive, followed by bonus bets and cash rebates.[4]

2.2.4. A broader experimental study published by Greo found that participants offered gambling inducements spent more money on bets and were less likely to opt out of betting compared to those without inducements — and this effect was stronger for participants with higher problem gambling severity scores**.** In other words, inducements are most effective at driving behaviour among the people they are most likely to harm.[5]

[4] Rockloff MJ, Browne M, Russell AMT, Hing N, Greer N. Sports betting incentives encourage gamblers to select the long odds: An experimental investigation using monetary rewards. J Behav Addict. 2019 Jun 1;8(2):268-276. doi: 10.1556/2006.8.2019.30. Epub 2019 Jun 7. PMID: 31172813; PMCID: PMC7044548.

[5] Ó Ceallaigh, D., Timmons, S., Robertson, D. A., & Lunn, P. D. (2025). Effects of inducements on sports gambling and decision-errors: An experimental study. Journal of Behavioral Addictions, 14(2), 959–971. https://doi.org/10.1556/2006.2025.00056

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FOI 27-145- Document 3

2.2.5. The Victorian Responsible Gambling Foundation's 2018 study (Hing et al., CQUniversity) on the effects of wagering marketing on vulnerable adults — one of the most comprehensive Australian studies on the topic — found that inducements are a key mechanism through which advertising drives harmful gambling behaviour in people already at risk.[6]

2.3. Why this matters for the Bill

2.4. Allowing advertising restrictions while permitting inducements is internally inconsistent. If the purpose of the Bill is to reduce the influence of gambling marketing on behaviour, leaving inducements unregulated undermines that purpose.

2.4.1. At Wesley Mission, our counsellors regularly hear from individuals drawn back into gambling by personalised bonus offers, "free bet" promotions, and VIP escalation pathways — often at the precise point they were trying to stop.

2.4.2. **Recommended amendment**

2.4.3. Insert a new Division 3A in Part 7C of Schedule 1 (or a standalone new Part) prohibiting inducements (Recs 2.1, 2.2). Inducements should include but not be limited to (a) sign-up bonuses or welcome offers; (b) deposit-matching promotions; (c) "free bet," "risk-free bet," or "bonus bet" promotions; (d) odds boosts or enhanced odds promotions; (e) cashback, rebate, or loss-back offers; (f) loyalty, VIP, or reward programs linked to wagering activity.

2.4.4. The regulation-making power in subsection (3) is essential. The gambling industry rapidly designs new inducement structures to circumvent specific prohibitions — the legislation must be able to respond without requiring further amendment.

3. Duty of Care

3.1. What the Bill does

3.1.1. The Exposure Draft does not create any statutory obligation on gambling operators to identify, prevent, or respond to gambling harm.

3.2. What the evidence shows

3.2.1. Without a legislated duty of care, operators have no legal obligation to act on the data they already hold — even when that data reveals clear indicators of harm.

[6] Hing, N, Russell, A, Rockloff, M, Browne, M, Langham, E, Li, E, Lole, L, Greer, N, Thomas, A, Jenkinson, R, Rawat, V, Thorne, H, 2018, Effects of wagering marketing on vulnerable adults, Victorian Responsible Gambling Foundation, Melbourne

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FOI 27-145- Document 3

3.2.2. The UK High Court confirmed in *Gibson v TSE Malta LP (t/a Betfair)* [2024] EWHC 2900 (Comm) that gambling operators do not owe a general duty of care to customers at common law. The Court dismissed claims by a customer who had lost approximately £1.5 million over a decade, finding that Betfair was not legally required to intervene, despite managing his account through a VIP team and holding extensive behavioural data.

3.2.3. This case illustrates precisely why a statutory duty of care is necessary. The common law will not develop one. Operators will not voluntarily adopt one against their commercial interests. If Parliament intends gambling harm to be prevented, it must legislate accordingly.

3.2.4. In Australia, the evidence of the downstream consequences of inaction is mounting. A government-commissioned NSW study by the Australian National University found a statistically significant relationship between gaming machine exposure and police-recorded family and domestic violence, with longitudinal analysis suggesting the relationship is likely causal.

3.2.5. The AIFS National Gambling Prevalence Study Pilot (2024) found that compared to 2019, more Australians are being harmed by gambling amid rising participation. The proportion of individuals engaged in high-risk gambling behaviour increased to 13.6% in 2024, up from 11.6% the previous year.

3.2.6. Australians collectively lose $32 billion on legal forms of gambling annually — the largest per capita losses of any country in the world. In the 2022–23 financial year, Australians lost $1,555 per adult.

3.2.7. Operators collect vast amounts of real-time data on customer behaviour. They know when a customer is escalating. They know when patterns indicate harm. Every other regulated sector that handles consumer risk — financial services, alcohol, tobacco — carries legal obligations to protect consumers. Gambling should be no different.

3.3. Recommended amendment

3.3.1. Insert a new standalone section that introduces a statutory duty of care requiring operators to; monitor accounts for harmful gambling patterns, intervene with warnings, mandatory limits, or suspension, maintain documented harm-prevention systems.

3.3.2. As part of the new standalone section, insert a component that includes (a) making compliance with the duty of care a condition of operating licence which is enforceable through the existing licensing framework with the ultimate sanction of licence revocation for persistent non-compliance.

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4. Mandated pre-commitment and affordability checks

4.1. What the Bill does

4.1.1. Schedule 3 of the Exposure Draft strengthens BetStop — the National Self-Exclusion Register — with welcome improvements including a 7-day confirmation period for deregistration (s 61JKA), stronger account closure requirements (s 61MB), and account-linking obligations (s 61MC).

4.1.2. However, BetStop is a reactive tool. It requires a person to identify themselves as experiencing harm and take the step of self-exclusion before any protection applies. The Bill does not mandate account-level pre-commitment controls or affordability checks.

4.2. What the evidence shows

4.2.1. Mandatory pre-commitment systems are significantly more effective than voluntary ones — and voluntary systems have repeatedly failed.

4.2.2. A comprehensive review by Delfabbro & King examined a decade of evidence on pre-commitment and limit-setting tools. It found that voluntary systems have disappointingly low uptake — only 1–10% of players use them — and confirmed the potential benefits of mandatory systems. The review drew on studies of mandatory limits in Norway, finding that mandated controls delivered meaningful reductions in gambling expenditure.[7]

4.2.3. A major 2025 comparative policy review of 30 European countries found that while almost all countries (27 of 30) have some form of limit-setting, effectiveness depends critically on how policies are designed and implemented. The review identified mandatory policies, system-level regimes, and reasonable maximum caps as the most promising practices, and recommended coupling limit-setting with duty-of-care obligations.

4.2.4. Longitudinal data from Finland, where mandatory pre-commitment was introduced for land-based electronic gambling machines, showed that total consumption of gambling declined, and — critically — declines in land-based EGM sales were not offset by online alternatives or other substitutes in the long term. This directly addresses the common industry argument that mandatory limits simply push people to other products.

4.2.5. The International Center for Responsible Gaming (ICRG) found that mandatory "hard lock" limits (where players cannot continue after a limit is reached) are more effective in reducing visits and expenditure than "soft lock" limits (where players can override).

[7] Delfabbro, P. H., & King, D. L. (2021). The value of voluntary vs. mandatory responsible gambling limit-setting systems: A review of the evidence. *International Gambling Studies*, *21*(2), 255–271. https://doi.org/10.1080/14459795.2020.1853196

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4.3. Why this matters for the Bill

4.3.1. Self-exclusion addresses harm after it has become severe enough that the individual recognises it and acts. Mandatory pre-commitment and affordability checks are preventative — they intervene earlier in the harm trajectory.

4.3.2. At Wesley Mission, individuals present to our services having already lost their savings, their homes, and their relationships. By the time they reach self-exclusion, the damage is done.

4.4 Recommended amendment

4.4.1 Insert a new section as part of Schedule 3 that (a) requires operators to mandate account-level deposit and net loss limits before a wager is accepted; (b) prohibits operators from allowing a customer to increase a deposit or loss limit in less than 72-hours; (c) requires operators to conduct mandatory affordability assessments where a customer's net losses exceed a prescribed threshold or their activity patterns indicate a risk of harm, with mandated intervention (limit reduction, account suspension, or other prescribed action) where harm risk is identified.

5.0 Other Considerations

5.1.1 This Bill represents a missed opportunity to legislate and implement the full suite of 31 recommendations of the Murphy Review, including the establishment of a National Gambling Regulator, the introduction of a Harm Reduction Levy, stronger restrictions on offshore operators, enhanced data transparency and reporting obligations, and the development of a comprehensive National Harm Reduction Strategy.

5.1.2 While not all of these reforms fall strictly within the scope of the Exposure Draft, they are essential components of a coherent, effective, and evidence-based national response to gambling harm. Without these structural measures, the impact of the Bill will be limited and key gaps in the current system will remain.

5.1.3 A national gambling regulator is critical to ensure consistent standards, coordinated oversight, and effective enforcement across jurisdictions. Australia's gambling market — particularly online wagering — is national in scale but fragmented in regulation, resulting in inconsistent protections, enforcement gaps, and limited accountability.

5.1.4 A national harm reduction levy should be designed to ensure effectiveness, accountability, and independence. The levy should provide sustainable, independent funding for prevention, early intervention, treatment services, and research. Current arrangements are fragmented and insufficient to meet demand, and do not align the costs of harm with the industry that generates those risks.

5.1.5 Stronger action is also needed to address offshore operators, including a public register of prohibited providers, ISP-level blocking, and enhanced monitoring of digital marketing channels, which continue to undermine domestic protections.

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FOI 27-145- Document 3

5.1.6 In addition, mandatory, standardised data transparency and reporting obligations are essential to support effective regulation. Without access to consistent data on losses, harm indicators, and interventions, policymakers and regulators cannot properly understand or respond to gambling harm.

5.1.7 These measures should be brought together under a comprehensive national harm reduction strategy, grounded in public health principles and supported by robust data and evaluation.

5. Conclusion

The *Interactive Gambling Amendment (Gambling Reform) Bill 2026* represents an important acknowledgment by the Australian Government that gambling harm requires stronger national action. The existing regulatory framework — fragmented, reactive, and heavily reliant on individual responsibility — is not equipped to address a market that is national, data-driven, and increasingly sophisticated. This submission has identified four critical areas where the Bill must be strengthened to achieve its stated objectives:

- Reducing exposure to gambling advertising, including a clear statutory pathway to a full prohibition;
- Eliminating harmful inducements that drive riskier behaviour and increased spending;
- Establishing a statutory duty of care to ensure operators take responsibility for preventing harm; and
- Introducing mandatory pre-commitment and affordability measures to shift the system toward prevention.

In addition, structural reforms — including a national regulator, sustainable harm reduction funding, improved data transparency, and stronger enforcement mechanisms — are essential to support a coherent and effective national response. Taken together, these reforms represent a shift from a model that places responsibility primarily on individuals, to one that recognises gambling harm as a systemic issue requiring systemic solutions. Australia has reached a critical juncture in gambling reform. Incremental change will not be sufficient to reduce harm at the scale currently being experienced. The Parliament now has the opportunity to establish a framework that is evidence-based, nationally consistent, and focused on prevention.

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FOI 27-145- Document 4

12 June 2026

Ms Ruvani Panagoda
A/g Assistant Secretary
Broadcasting and Gambling Branch • Broadcasting, Media and News Policy Division
Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts.

Submitted by email to: Online.Gambling@communications.gov.au

Exposure Draft - Interactive Gambling Amendment (Gambling Reform) Bill 2026

Dear Ms Panagoda

Thank you for your email of 29 May 2026 providing Relationships Australia with the opportunity to comment on an Exposure Draft of the Interactive Gambling Amendment (Gambling Reform) Bill 2026. Relationships Australia is strongly of the view that Government should fully implement the recommendations of the Murphy Report as a matter of urgency. Nevertheless, we welcome Government initiatives to prevent and minimise gambling harms and look forward to continuing to work with Government to support the effective regulation of online gambling.

This submission is consistent with previous related submissions, including:

- our submission of 11 November 2022 to the inquiry undertaken by the House of Representatives Social Policy and Legal Affairs Committee into online gambling and its impacts on those experiencing gambling harm
- our submissions to this Department and the Australian Communications and Media Authority concerning gambling harm
- our submission of 30 May 2025 to Mr Richard Eccles, in his role as Statutory Reviewer of BetStop – the National Self-Exclusion Register, and
- our submission to this Department of 27 May 2026 concerning proposed modernisation and harmonisation of classification standards under the National Classification scheme.

Our previous submissions can be found at https://www.relationships.org.au/research/#advocacy .

The work of Relationships Australia

Relationships Australia is a federation of community-based, not-for-profit organisations with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, lifestyle choice, cultural background or economic circumstances. We aim to support all people in Australia to live with positive and respectful relationships, and believe that people have the capacity to change how they relate to others.

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FOI 27-145- Document 4

Relationships Australia believes that violence, coercion, control and inequality are unacceptable. We respect the rights of all people, in all their diversity, to live life fully within their families and communities with dignity and safety, and to enjoy healthy relationships. Our services include:

- individual, couples, and family counselling
- family law counselling, mediation and dispute resolution
- Specialised Family Violence Services
- Children's Contact Services (services which provide supervised contact and changeovers for high risk families)
- post-separation services for parents and children
- services designed for men, including programs to support parenting capacities and resources, Men's Behaviour Change Programs, and tailored programs such as the Respectful Relationships Program for Indigenous clients
- parenting capacity programs
- services to support those adversely affected by harmful use of alcohol and other drugs
- gambling help services
- mental health services and program, including suicide prevention, Headspace services, and Family Mental Health Support Services
- therapeutic and case management services to applicants for Redress Support Services, Forgotten Australians, Forced Adoption Support Services, Intercountry Adoptee Family Support Service, and Post Adoption Support Services
- a range of tailored services for older Australians, including senior relationship services, elder mediation, elder abuse case management and mediation, social connection services and mental health services in residential aged care on behalf of Primary Health Networks in South Australia, and
- employee assistance programs.

For more than 75 years, we have worked with our clients to enhance not only family relationships, but also relationships with friends, colleagues, and across communities.

Recommendations

For the reasons set out in our discussion, below, Relationships Australia makes the following recommendations:

Recommendation 1 That a twelve-month post-implementation review be built into the legislative amendments to swiftly identify unintended consequences and implementation challenges, followed by a comprehensive three-year review to assess the impact of the amendments against their policy objectives.

Recommendation 2 That, in recognition of the stresses that gambling harm inflicts on relationships, and co-occurrence of gambling harm with intimate partner violence and abuse of older adults, additional funding be made available to relationships counsellors under the reformed

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FOI 27-145- Document 4

children and families program administered by the Department of Social Services and the reformed family relationships program administered by the Attorney-General's Department.

Recommendation 3 That the ACMA receive additional funding to carry out its expanded roles in a way that optimises the successful implementation of these reforms.

Recommendation 4 A complete ban on wagering advertising content during live sporting events and day time television.

Recommendation 5 That all relevant prohibitions be elevated to the same level of importance, by incorporation into the Act via the current amendments.

Recommendation 6 That wagering advertising content be banned from live sporting events without the exceptions for scheduled or unscheduled breaks.

Recommendation 7 That, to receive wagering advertising content on an online content service, a user must opt in.

Recommendation 8 That clauses 62P and 62Q be re-framed to create an offence where wagering advertising content is delivered to, or accessed by, among others, a person who has not opted in to receive such content.

Recommendation 9 That subparagraph 62Y(a)(ii) be omitted as being unreasonably broad, and failing to give sufficient weight to the harm prevention and minimisation objectives of the legislation.

Recommendation 10 That paragraph 62Y(b) be omitted

Recommendation 11 That the obligation in clause 61PDA include a timeframe within which providers must notify the Register operator.

Framing principles for this submission

Principle 1 - Commitment to human rights

Relationships Australia contextualises its services, research and advocacy within imperatives to strengthen connections between people, scaffolded by a robust commitment to human rights. Relationships Australia recognises the indivisibility and universality of human rights and the inherent and equal freedom and dignity of all.

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FOI 27-145- Document 4

Our commitment to human rights necessarily includes a commitment to respecting epistemologies beyond conventional Western ways of being, thinking and doing. A commitment to respecting epistemologies and experiences of Aboriginal and Torres Strait Islander people is acutely important to policy and programme development and service delivery. Connection to Country, and the context-specific experiences of kinship, for example, do not countenance the hyper-individualism that pervades Western social and economic assumptions. Centring the epistemologies and experiences of Aboriginal and Torres Strait Islander people is a necessary (although not sufficient) step in achieving the targets in the National Agreement on Closing the Gap.

Principle 2 - Gambling harm is a pressing public health concern in its own right

Responsibility for population health is a shared responsibility, conferring both freedoms and obligations on individuals, community groups, businesses, corporations and governments at all levels. This responsibility is even greater in respect of children and young people.

The Australian Gambling Research Centre has found that 46% of Australians who gamble were classified as being at some risk of gambling harm.[1] The expansion of online gambling has been rapid, sustained and escalating. It can be offered as an online only product, or as a companion product to offline or land-based activities, and so requires multi-pronged strategies to prevent gambling-related harms. Online gambling is largely synonymous with internet, remote, and interactive gambling. In this submission, 'online gambling' refers to the range of gambling activities offered through interactive technology, including computers, mobile and smart phones, tablets, and digital televisions. While this mode of technologically supported gambling shares most hallmarks of other gambling activities, differences arise from gambling in person at land-based retail outlets and venues and placing wagers over the telephone, mainly in terms of unbridled accessibility. (Gainsbury, 2015) Online gambling has turbo-charged the opportunities for gambling providers in connection with sporting activities. Bans on advertising tobacco and alcohol products through sport created a vacuum that gambling providers have filled with alacrity, causing extensive harm to children and families across Australia.

'Harmful gambling' refers to 'difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community' (Neal, Delfabbro & O'Neil, 2005). Gambling-related harms constitute a significant and increasingly pressing public health issue in Australia. Its harms affect not only those who gamble, but also their families and friends, the community and governments. Several studies have found greater levels of harmful gambling among online, compared to offline, gamblers (eg Griffiths et al, 2009; Wood & Williams, 2011). In 2011, the rate of harmful gambling among online gamblers was three times higher than for offline gamblers (Gainsbury, Russell, Hing et al, 2014).

[1] AGRC Community attitudes snapshot, March 2023.

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FOI 27-145- Document 4

Principle 3 – Commitment to inclusive and universally accessible systems and services

Relationships Australia is committed to universal accessibility of systems and services. This requires government systems and community services to be inclusive and culturally safe services. Our clients (and staff) experience stigma, marginalisation and exclusion arising from diverse circumstances and positionalities. None of these exists at the level of an individual or family. They become barriers to full enjoyment of human rights and full participation in economic, cultural, and social life through the operation of broader systemic and structural factors including:

- legal, political and bureaucratic frameworks
- beliefs and expectations that are reflected in decision-making structures (such as legislatures, courts and tribunals)
- policy settings that inform programme administration, and
- biases or prejudices that persist across society and that are reflected in arts, culture, media and entertainment.

Principle 4 – Fragmentation causes harm

Relationships Australia National Office consistently identifies fragmentation of systems (including legal and regulatory systems) as a principal barrier to authentic accessibility. Forcing families to shoulder the burden of navigating fragmented systems such as classification and online safety systems is the opposite of trauma informed and person-centred, and undermines human rights. Multiple inquiries have found that people are harmed by fragmentation.

Principle 5 - Prevention is key to disrupting harmful behaviours

Intergenerational patterns of engaging in harmful behaviours must be disrupted to achieve major strategic goals including ending gender-based violence within a generation, preventing child sexual abuse, ending abuse and mistreatment of older adults and Closing the Gap.[2] Harm prevention anchors the achievement of multiple Government health and social policy commitments and priorities. It is a prerequisite of Australia's long-term economic success, boosting labour market and education participation while also lowering avoidable expenditure on health and social services.

Principle 6 – Gambling harms and relationships

Isolation and loneliness

Some people can, without noticing, become increasingly isolated as they immerse themselves in gambling, losing the protective factors that social connection provides, and leaving them vulnerable to a range of harms to physical and mental health that accompany social exclusion

[2] See, eg, the *National Plan to End Violence Against Women and Children 2022-2032*, the *National Framework for Protecting Australia's Children 2021-2031 (Safe and Supported)*, the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030*, the *National Agreement on Closing the Gap 2020*, and the *National Plan to End Abuse and Mistreatment of Older People 2026-2036*.

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FOI 27-145- Document 4

and loneliness. In studies of young people, social isolation and loneliness have consistently been associated with poor health outcomes. Pressman and colleagues (2005), for example, found small social networks were independently associated with poor immune response, while adolescents who do not have close friendships and good social networks consistently report lower levels of self-esteem, more psychological symptoms of maladjustment, and are at higher risk of suicide (Kidd, 2004).

In particular, gambling, for some individuals, becomes a substantial barrier preventing them from initiating and nurturing social connections with family, friends and the broader community. Social connection has been studied extensively, both in Australia and overseas, with authors now firmly agreeing about the importance of social connection in shaping wellbeing across the life span, particularly in later life. So important and fundamental is our need to belong, it has often been considered as central to human evolution, with group membership increasing the survival of the human species by encouraging our ancestors to coordinate activities that promoted advantages such as sharing and protecting food, shelter and resources (Baumeister & Learly, 1995).

It is therefore not surprising that deficits in experiences and feelings of belonging have been associated with a range of poor mental, physical and socio-economic outcomes for people, their families and communities. In a meta-analytical review of literature, people who are socially isolated or lonely are at risk of premature mortality at rates comparable with other well-established risk factors, including lack of physical activity, obesity, substance abuse, poor mental health, injury and violence (Holt-Lunstad, 2015). The research literature also identifies relationships between loneliness and poor mental health, including depression and anxiety (Mills & Rubin, 1998; Nangle et. al., 2003; Wang et. al., 2018), lower levels of self-worth (Qualter & Munn, 2002), life satisfaction (Goodwin, Cook, & Yung, 2001) and subjective wellbeing (eg Chipuer, Bramston & Pretty, 2003).

Loneliness is a complex social problem and a public health concern, which should be regarded as a social determinant of health in its own right. It stems from dissatisfaction with our relationships, a lack of positive and respectful relationships, or both of these. It is often caused by experiences of exclusion due to structural and systemic social realities that form obstacles to participation in social, economic, cultural and political life. As a public health concern (Heinrich & Gullone, 2006; Holt-Lunstad et al, 2015; Mance, 2018; AIHW, 2019), loneliness has been linked to physical health risks such as being equivalent to smoking 15 cigarettes a day and an increased risk of heart disease (Valtorta, 2016). Loneliness is a precursor to poorer mental health outcomes, including increased suicidality (Calati et al, 2019; McClelland et al, 2020; Mushtaq, 2014).[3]

[3] The campaign Ending Loneliness Together has released a guide that explains how community organisations can use validated scales to measure loneliness: https://endingloneliness.com.au/wp-content/uploads/2021/08/AGuidetoMeasuring-Loneliness-for-Community-Organisations_Ending-Loneliness-Together.pdf .

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FOI 27-145- Document 4

Gambling and domestic and family violence

Further, gambling-related harm almost always includes a complex mix of health, financial, relationships and social issues that span domestic and family violence, elder abuse, mental health issues, substance abuse and homelessness. Recent Australian research has found, *inter alia*, that:

- gambling does not directly cause intimate partner violence, but can intersect with it in a range of different ways, including by exacerbating existing violence
- the community lacks awareness about harmful gambling, including its links to intimate partner violence, and •
- gambling-related harm (including economic abuse) is enabled by current protocols of gambling operators and financial institutions (Hing et al, 2020).

Further, gambling has been linked with perpetration of abuse of older adults (particularly by friends of older adults).[4]

Comments regarding the consultation process

We acknowledge that the Department has itself been operating under significant time constraints, and we make these observations in a constructive spirit. Nevertheless, we are concerned that the brevity of the consultation window, combined with a targeted rather than open consultation process, risks disadvantaging and even excluding key community voices. We are particularly concerned that people with lived experience of gambling harm — whose insights are essential to testing whether these amendments will operate as intended — may not have had a meaningful opportunity to contribute. Where legislation bears directly on people's lives and addresses a recognised public health issue, rigorous scrutiny and testing of proposed amendments is not a procedural nicety but a substantive safeguard. While we have been pleased to respond within the timeframe provided, we are conscious that other organisations and individuals, particularly those reliant on volunteer labour, may not have been able to do so.

For this reason, we consider it essential that the amendments incorporate a clear evaluation and monitoring framework from the outset. Specifically, we **recommend** that a twelve-month post-implementation review be built into the legislative amendments to swiftly identify unintended consequences and implementation challenges, followed by a comprehensive three-year review to assess the impact of the amendments against their policy objectives. Incorporating these mechanisms into the legislation itself would go some way to compensating for the compressed consultation process, ensuring that the voices and experiences unable to be heard at this stage can inform refinement of the framework over time. (***Recommendation 1)***

[4] Qu et al, 2020; see especially pp 73-74, 76-77, 81.

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FOI 27-145- Document 4

Overarching comments on the Exposure Draft

Overall, Relationships Australia welcomes:

- new restrictions on wagering advertising, including banning wagering advertising content during live coverage of sports
- new requirements on online services to prevent restricted users (including under 18s) from accessing such content
- measures to strengthen the framework for tackling illegal gambling services, including placing positive obligations on financial institutions and online services to prevent payments and access to illegal gambling service
- reforms to enhance the framework governing the National Self-Exclusion Register (known as BetStop), and
- the proposed prohibition of online keno and foreign matched lotteries, and
- clarification of the definition of trade promotion gambling services.

Relationships Australia also welcomes efforts to ensure alignment of the reforms with existing legislation, as well as existing industry rules and codes. We welcome the knitting together of the reforms with current licences. Such approaches support a coherent statute book which, in turn, promotes accessible legislative frameworks, access to justice, and social and political inclusion.

Relationships Australia has previously acknowledged the additional funding, through the 2026-2027 Budget to enhance the availability of financial counsellors to people experiencing gambling harm. We **recommend** that, in recognition of the stresses that gambling harm inflicts on relationships, and co-occurrence of gambling harm with intimate partner violence and abuse of older adults, additional funding be made available to relationships counsellors under the reformed children and families program administered by the Department of Social Services and the reformed family relationships program administered by the Attorney-General's Department. (***Recommendation 2)***

Relationships Australia supports the expansion of the ACMA's powers and functions in support of implementing the proposed prohibitions. We note that, under the measures in the Exposure Draft, the ACMA will:

- have additional regulatory and enforcement functions
- be empowered to take regulatory and enforcement action more swiftly
- have additional complaints handling functions
- have additional powers to advise the Minister on its own motion, and increased responsibilities to advising the Minister in response to a Ministerial direction
- have additional functions to make guidelines.

Relationships Australia **recommends** that the ACMA receive additional funding to carry out its expanded roles in a way that optimises the successful implementation of these reforms. (***Recommendation 3)***

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Comments on specific provisions of the Exposure Draft

Provision	Comment
Subclause 10A(1)	Relationships Australia welcomes the inclusion of sporting events taking place outside Australia, and the inclusion of electronic sports.
Subclauses 10A(3), 62M(3), 62P(5), 62Q(4), clause 62S, note 1,	Relationships Australia is concerned that the exclusion of horse, greyhound and harness racing from the definition of 'sporting event' and, as a result, the operation of the prohibitions, has the potential to be too broad and may give rise to an unintended consequence whereby these topics become the focus of additional advertising in order to circumvent the ban. While we appreciate the need to carve out dedicated racing channels, we feel this could more easily be done by specific exception rather than a blanket exemption.
Clauses 62K, 62L and 62M	Relationships Australia considers that permitting wagering advertising content to be broadcast up to 3 times in an hour during daytime is not an appropriate balance between the right of adults to gamble (which is not being challenged) and the safety of children. Whether or not wagering is advertised, adults will gamble. Adults with an interest in wagering will find products and advertising for those products. There is no harm to adults if wagering advertising content is banned completely during all day time television (not just during live sporting events plus the intended 5 minute 'shoulder' periods); there is certainly harm to children if it is not. Relationships Australia, consistent with previous submissions, **recommends** a complete ban on wagering advertising content during live sporting events and day time television. (***Recommendation 4)*** Further, we note that the restrictions contained in Part 7C are intended to complement, rather than replace, existing restrictions with respect to gambling advertising during children's television programs (for example) as found in the Free TV Commercial Television Industry Code of Practice. We are concerned that by allowing the rules to co-occur in separate locations, the amendments unnecessarily create confusion and fragmentation within the system and allocate a 'tiered level' of importance among the different prohibitions. Accordingly, we **recommend** that all relevant prohibitions be elevated to the same level of importance, by incorporation into the Act via the current amendments. ***(Recommendation 5)***

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Clause 62L	Relationships Australia notes that, unlike the daytime restrictions, wagering advertising content will be permitted during any scheduled or unscheduled breaks (e.g. halftime or a rain-delay). We consider that this undermines the intent to break the nexus between sporting and wagering and protect children and young people from predatory wagering advertising. As noted by Senator David Pocock during the recent Estimates hearings, children and young people who have started watching a live sporting event before 8.30pm are likely to continue to watch it beyond that time. The 8.30pm 'watershed' is out of date and does not reflect contemporary viewing habits – particularly in relation to live sporting events. As noted above, a ban on advertising is not a ban on adults wagering; they may still do so as much as they like. What a ban does do is protect children and young people from predatory grooming behaviour that may harm them while profiting the predators. Relationships Australia **recommends** that wagering advertising content be banned from live sporting events without the exceptions for scheduled or unscheduled breaks. (***Recommendation 6)***
Clause 62M	Relationships Australia, consistent with previous submissions, **recommends** a complete ban on wagering advertising content. (see ***Recommendation 4)***
Clause 62N	Relationships Australia welcomes the ban on advertising during school drop off and pick up times.
Clauses 62P and 62Q	Relationships Australia supports a complete ban on wagering advertising content on all online content services unless the online content service provider takes reasonable steps to ensure that restricted users and age-unverified users do not receive or have access to the content. However, Relationships Australia considers that the current inclusion of an opt out requirement puts all the cards in the hands of the wagering providers. An appropriate balance between the rights of adults to wager and the safety of children requires opt in. Adults who are interested in wagering advertising content will have the sophistication and motivation to opt in. Relationships Australia **recommends** that, to receive wagering advertising content on an online content service, a user must opt in. (***Recommendation 7)*** Relationships Australia further **recommends** that, as a consequence, clauses 62P and 62Q be re-framed to create an offence where

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FOI 27-145- Document 4

	wagering advertising content is delivered to, or accessed by, among others, a person who has not opted in to receive such content. (***Recommendation 8)***
Clauses 62S, 62T and 62U	Relationships Australia welcomes prohibitions on: • sporting uniforms and venues displaying wagering advertising content at any sporting event or activity related to a sporting event, including training sessions and press conferences [clause 62S] • athletes, celebrities and other notable persons promoting wagering advertising content [clause 62T] • promoting odds [clause 62U], and • inclusion in wagering advertising content of harmful or misleading material. We note the Government's intention to include in the legislation introduced into Parliament application provisions to avoid interfering with existing contracts.
Clause 62V	Relationships Australia supports this provision.
Clause 62W	Relationships Australia supports restrictions on harmful or misleading wagering advertising content.
Clause 62Y	Relationships Australia **recommends** that subparagraph 62Y(a)(ii) be omitted as being unreasonably broad, and failing to give sufficient weight to the harm prevention and minimisation objectives of the legislation. (***Recommendation 9)*** We further recommend that paragraph 62Y(b) be omitted because absence of benefit does not deprive the otherwise contravening conduct of its harmful effect. (***Recommendation 10)***
Schedule 2	Relationships Australia welcomes provisions intended to disrupt illegal gambling businesses.
Schedule 2, Part 2 Clause 61AB	Relationships Australia supports the new definition of when online content is taken to be published in Australia (clause 61AB).
Schedule 2, Part 3	Consistent with our support for a digital duty of care, Relationships Australia welcomes the imposition of positive requirements on a wide range of actors to block and disrupt access to designated interactive gambling services.

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Schedule 2, Part 4	Relationships Australia welcomes reforms to enable swifter investigative and regulatory responses. We **recommend** that the ACMA be sufficiently resourced to carry out these functions in a way that supports successful implementation of these reforms. ***(see Recommendation 3)***
Schedule 3, BetStop	Relationships Australia welcomes measures to enhance the effectiveness of BetStop, including through acting on recommendations made in the Eccles Review.
Clause 61GB	Relationships Australia is concerned that care be taken to ensure that relevant skilled persons are not excluded by the operation of clause 61GB and as such would be grateful for further information on the basis on which an individual would be eligible to be prescribed as a qualified counsellor for the purposes of this provision.
Clause 61GE	In our engagement with the Eccles Review, Relationships Australia expressed concerns about the extent to which wagering service providers were evading the operation of the Register through a range of other contact approaches to registrants, which masked marketing activities. Accordingly, Relationships Australia supports the expanded approach to contacts initiated by wagering providers.
Clauses 61GF, 61GG	Consistent with our support for clause 61GE, Relationships Australia supports further restricting the opportunities for wagering service providers to contact registered individuals.
Clause 61HA	Relationships Australia supports measures to ensure continuity of operation of the Register.
Subclause 61JK(2)	Relationships Australia supports application of the 3 month minimum self-exclusion period to all individuals who register, regardless of whether they have previously been registered with BetStop.
Clause 61JKA	Relationships Australia supports the introduction of greater 'friction' for removal from BetStop, including by the requirement of an additional positive act on the part of an individual to confirm that they wish to be removed from the Register.
Clause 61MB	Relationships Australia supports the introduction of clearer rules for closing accounts.

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Clause 61MC	Relationships Australia welcomes the provisions requiring of account information to be linked, subject to restrictions relating to the purposes of linkage.
Clause 61NC	Relationships Australia welcomes measures to support higher quality data-matching by requiring complete and robust identification data. As we noted to the Reviewer, we are aware of several ways in which registered individuals have been able to circumvent the Register checks by using incomplete information from third parties.
Clause 61PDA	Relationships Australia welcomes measures to impose on providers of regulated interactive gambling services the responsibility of keeping the Register operator updated with changes. However, we **recommend** that the obligation include a timeframe within which providers must notify the Register operator. (***Recommendation 11***) This will clarify the obligation and support the integrity of the Register, while also supporting effective operation of subclause (5) (continuing contravention).
Clause 64C	Relationships Australia supports the extended timeframe within which the ACMA can issue infringement notices.
Amendments of the *National Self-exclusion Register (Cost Recovery Levy) Act 2019*	Consistent with our engagement with the Eccles Review, Relationships Australia supports robust cost recovery in relation to the operation of the Register.
Schedule 4 (Online lottery products)	Consistent with our 2024 submission about regulation of online keno and foreign matched lotteries, Relationships Australia supports prohibition of these activities, as well as clarifications which close the loopholes enabling lotteries and subscription products to exploit the exceptions for genuine trade promotions.

Fragmentation arising from the reliance on legislative instruments

Finally, Relationships Australia wishes to record our growing concern at the extent to which the practical scope and operation of primary legislation is increasingly shaped by legislative instruments. This is a trend evident across the statute book, and it is particularly pronounced in this suite of amendments. We have noted earlier in this submission one concrete example,

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where certain prohibitions sit within an existing industry code of conduct while related new rules are located in the Act itself.

It is not difficult to see how this fragmentation of the regulatory framework across instruments of differing status, visibility and enforceability may generate confusion – for industry, for regulators and, most importantly, for the people the framework is designed to protect. We recognise the reasons governments adopt this approach: it affords flexibility, and allows frameworks to adapt without requiring every operational detail to be settled at the point a Bill is passed. These are legitimate considerations. However, they come at a cost to transparency, parliamentary scrutiny, and the coherence and accessibility of the law. We acknowledge that reshaping whole-of-government drafting practice is beyond the remit of any single department. Nonetheless, we urge the Department, in all aspects of its legislative design work, to treat the reduction of complexity and fragmentation as a guiding objective by locating substantive obligations and prohibitions in primary legislation wherever practicable, and ensuring that where legislative instruments are used, their relationship to the Act is clear and readily navigable.

Conclusion

Thank you again for the opportunity to comment on the Exposure Draft. We look forward to continuing to work with the Government to minimise gambling harm across the community. Should you wish to discuss any aspect of this submission, or other matters relating to gambling harm policy, please do not hesitate to contact me at s47F @relationships.org.au or on s47F ; alternatively, you can reach our National Policy Manager, s47F , at s47F @relationships.org.au or on s47F .

Kind regards

s47F

Nick Tebbey
National Executive Officer

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FOI 27-145- Document 4

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FOI 27-145- Document 5

IQ26-000064

Division/Agency: DIV - Digital Policy Online Safety and Classification

Hansard Reference: Spoken, Page No. 47 (04 August 2026)

Topic: Three ads per hour decision

Sarah Hanson-Young asked:

Senator HANSON-YOUNG: Whose advice was it that three ads per hour was safe for children or general members of the community?
Ms Vandenbroek: That was a decision of government that that was what would be included in the bill.
Senator HANSON-YOUNG: I understand it was a decision—on whose advice is that a safe number?
Mr Mackay: I think that that is one that we will need to take on notice. As you'd appreciate, the framing of the package that the government has announced and the legislation that's been introduced are decisions taken through the cabinet process, and, consistent with the longstanding convention, we're not in a position to go to the deliberations of cabinet.
Senator HANSON-YOUNG: Let me start again, Mr Mackay. Does the department hold any advice that says three ads an hour is safe for children?
Mr Mackay: As I say, Senator, I think that is one that we—
Senator HANSON-YOUNG: No. Do you hold that evidence? Does the department have that evidence anywhere?
Mr Mackay: We will take that on notice.
Senator HANSON-YOUNG: No, do you? You must know.
Mr Mackay: I don't know. You asked if we hold it anywhere. I will take it on notice.
Senator HANSON-YOUNG: Have you ever seen advice that says that three ads an hour is safe for children?
Mr Mackay: I will take it on notice.
Senator HANSON-YOUNG: Have you ever received advice or seen any evidence, Mr Mackay, that three ads an hour are safe for children?
Mr Mackay: I will take the question on notice, Senator, as to the evidence that the department holds.
CHAIR: Let's do it this way. The question has been put about whether you specifically have received or seen that advice. You've taken it on notice in terms of the department. I think the best way to resolve this is, if you cannot recall that, then you can say that but that you'll take it on notice to clarify.
Mr Mackay: Yes, to my knowledge, not that I recall. I will take it on notice.

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Answer:

The Australian Government has a stated policy intent of reducing the saturation of wagering advertisements across broadcast television.

The frequency cap is intended to address the saturation of wagering advertising content during popular programming. Setting a limit of how many advertisements can be shown in a 60-minute period will prevent instances of wagering advertising saturation during peak or popular programming.

The Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts' analysis of Nielsen Ad Intel data found that there have been up to 8 wagering advertisements in a 60-minute period during prime-time family programming in recent years.

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