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AMA submission to *Proposed new mandatory minimum classifications for gambling-like content in computer games.*

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The Australian Medical Association (AMA) welcomes the opportunity to make a submission to The Department of Infrastructure, Transport, Regional Development, Communications and the Arts' consultation *on the Proposed new mandatory minimum classifications for gambling-like content in computer games*. We are pleased to see these new classifications being proposed, along with acknowledgement of the potential harmful link between online gaming and gambling and the broader harms this presents to health and wellbeing.

The AMA suggests that better regulation is needed to combat the ever-changing digital landscape, that legislative frameworks needed to be updated frequently and that stronger monitoring of advertising is needed to counter any breaches of the current codes.¹ The AMA holds serious concerns that targeted content, which is often found on online platforms, frames gambling as a desirable, trustworthy and fun activity, whilst looking to build brand awareness and normalise gambling for consumers.²

The AMA notes with concern the rapid developments in online gaming and the prevalence of use amongst children. Online, or interactive, gaming uses technologies such as 'skins' and 'loot boxes' which are very similar in aesthetics and techniques to other gambling products.³ They also allow children to use money for intangible goods, such as loot boxes, which can cause economic and health harm.⁴ This is resulting in increased Internet Gaming Disorder prevalence in the community, which leads to harmful gambling behaviours.⁵ Online gaming, which has potential health and wellbeing harms in and of itself, also presents as a potential gateway to gambling addiction.⁶

The AMA is aware of growing concerns from the medical profession around the lack of data and oversight of the harms that can arise from screen addiction. Further information is needed to explore and understand the link between digital platforms, such as online gaming sites, and addictions such as internet (or screen) addiction,⁷ internet gaming disorder,⁸ online gambling addiction,⁹ and problematic online pornography use (POPU)¹⁰. Those experiencing the harms of these addictions can be manipulated by the targeted content, such as promotion of harmful

products they are trying to seek help to avoid, being shown to them online.¹¹ This is risk to those looking to seek help and change their addictive behaviours.¹²

The AMA is concerned that children are targeted early in life, through digital platforms and entertainment channels such as online gaming. This increases the risk of lifelong addictive behaviours with associated social, economic and health impacts. These proposed mandatory minimum classification changes to online gaming are an important step in safeguarding Australia's children against the wider potential harms of gambling, as well as harmful and inappropriate online content.

7 JUNE 2023

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¹ Australian Medical Association (2022) *AMA Submission into Inquiry into Online Gambling* Retrieved 15/02/23 from: <https://www.ama.com.au/articles/ama-submission-parliamentary-inquiry-online-gambling-and-its-impacts-those-experiencing>

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⁴ Rockloff, M. & Russell, A. & Greer, N. & Lole, L. & Hing, N. & Browne, M. (2021). Young people who purchase loot boxes are more likely to have gambling problems: An online survey of adolescents and young adults living in NSW Australia. *Journal of Behavioral Addictions*. 10. 10.1556. doi:10.1556/2006.2021.00007

⁵ 9 Drummond, A., Sauer, J. D., Ferguson, C. J., & Hall, L. C. (2020). The relationship between problem gambling, excessive gaming, psychological distress and spending on loot boxes in Aotearoa New Zealand, Australia, and the United States-A cross-national survey. *PLoS one*, 15(3), e0230378. doi:10.1371/journal.pone.0230378.

⁶ Delfabbro, P. & King, D. (2020) Gaming-gambling convergence: evaluating evidence for the 'gateway' hypothesis, *International Gambling Studies*, 20:3, 380-392. doi:10.1080/14459795.2020.1768430.

⁷ Oviedo-Trespalacios, O., Nandavar, S., Newton, J. D. A., Demant, D., & Phillips, J. G. (2019). Problematic Use of Mobile Phones in Australia...Is It Getting Worse?. *Frontiers in psychiatry*, 10, 105. <https://doi.org/10.3389/fpsy.2019.00105>

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⁹ Sally Gainsbury (2017) *Problem Gambling and the internet*, Retrieved 20/02/23 from: <https://psychology.org.au/for-members/publications/inpsych/2017/oct/problem-gambling-and-the-internet>.

¹⁰ de Alarcón, R., de la Iglesia, J. I., Casado, N. M., & Montejo, A. L. (2019). Online Porn Addiction: What We Know and What We Don't-A Systematic Review. *Journal of clinical medicine*, 8(1), 91.

¹¹ Winter S, Maslowska E, Vos AL. (2021) The effects of trait-based personalization in social media advertising. *Computers in Human Behavior*. 2021;114:106525.

¹² Hing, N., Cherney, L., Blaszczynski, A., Gainsbury, S. M., & Lubman, D. I. (2014a). Do advertising and promotions for online gambling increase gambling consumption? An exploratory study. *International Gambling Studies*, 14(3), 394-409.