



c/o 10 Pitt St
Adelaide, 5000

Mr R Chappell
Director
Independent Gambling Authority
45 Grenfell St
Adelaide.
IGA ref: AUTH 05/0077

Dear Robert,

Re: Review 2006 – further responses

We write to respond briefly to two matters arising from the codes of practice Review Inquiry held on the 23rd and 24th of May 2006.

1. Legal opinions submitted by Hon Nick Xenophon

The Taskforce believes that the expert opinions obtained by and submitted by Hon Nick Xenophon deal effectively with the legal questions asked during the hearings about the extent of authority of the Independent Gambling Authority. The Taskforce endorses these legal submissions, believing them to be consistent with our views.

2. On venue advertising code - external signage

The Taskforce endorses the action from the Authority contained in the letter dated 15th of September that "The Authority is giving consideration, in relation to hotels and clubs, to a series of restrictions on their external advertising (signs and the like) similar to those operating in New South Wales."

The Taskforce has presented to previous inquiries, submitting that there should be a total ban on the advertising of gambling activities including on venue advertising, other than to indicate the nature of the venue e.g. 'Hotel', 'Casino', 'TAB agency'. The purpose of banning advertising is to reduce the prompts to gamble for people with gambling problems and people at risk of gambling problems. The Taskforce continues to be very concerned by the apparent extent of gambling by young people and believes that advertising of any form of gambling serves to create a climate where gambling is promoted as an acceptable, every day activity, without reference to the risks and pitfalls, particularly for young people.

The proposal from the Authority is in line with previously expressed views of the Taskforce. We are clear that on venue signage can be a trigger to gamble for people who are working to control their gambling behaviour. We note earlier evidence presented to the Authority that came from surveys from Relationships Australia and UnitingCare Wesley Adelaide Break Even clients identifying that a majority of clients with gambling problems gambled within five minutes of home. This means that people with gambling problems are highly likely to gamble in their local neighbourhood. So signs on a local hotel or club, promoting gambling

activity, are highly likely to influence some people with gambling problems (or at risk of gambling problem) to gamble when they had not intended to gamble.

We also note that gambling related signage should only be used for nomenclature purposes and to identify 'points of difference' for venues. Since a vast majority of hotels in South Australia and many larger clubs have poker machines, there is no need for signage since almost all members of the public know, as common knowledge, that poker machines are highly likely to be in any given hotel or larger clubs.

However the Taskforce believes it would be appropriate for hotels and clubs, without poker machines, to be able to highlight this point of difference with on venue signage. For example, using phrases like "pokies free" and "no poker machines" are the only circumstances where the terms 'poker machine' or 'pokies' could appropriately be used as part of on venue signage.

In supporting the suggestion from the Authority about on venue signage, the Taskforce notes that it has assessed this as a 'medium' priority action, from the set of 'round two' issues.

The priority codes of practice issue for the Taskforce continues to be enforcement of codes of practice and gambling legislation, an issue covered in some detail in our submission.

The Very High Priority and High Priority 'codes round two' issues, for the Taskforce, continue to be those detailed in our written submission:

Very High Priority

- 6. Inducements and loyalty programs: banning them**
- 13. Automated coin dispensing machines, automatic teller machines and cheque cashing facilities**
- 15. Facial recognition and smart card technologies**

High Priority

- 5. Six hour break—common closing hours for gaming machine Venues.**
- 8. Relationship with counselling agencies**
- 9. Reporting of potential problem gamblers**
- 14. Linking the service of alcohol and gambling**

We thank the Authority for the opportunity to make these comments and look forward to reading the final deliberations of the Authority pertaining to the 2006 review of codes of practice.

Yours sincerely

Helen Carrig
Chair of Taskforce