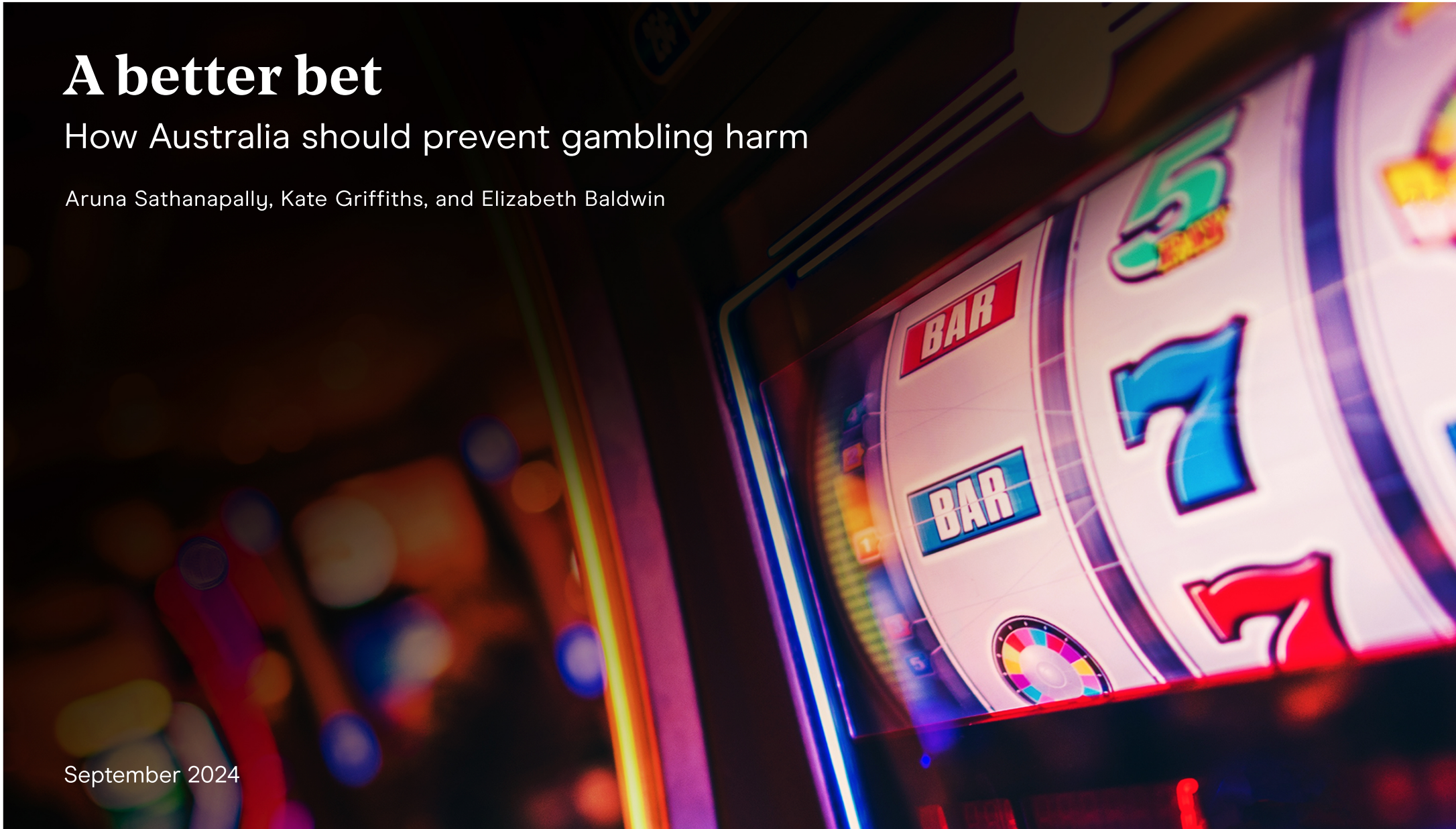


A better bet

How Australia should prevent gambling harm

Aruna Sathanapally, Kate Griffiths, and Elizabeth Baldwin

September 2024



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Overview

Gambling is everywhere: on our screens, in our pubs and clubs, and available anytime at our fingertips. But gambling products are not like other forms of entertainment – it is all too easy to lose too much.

Australia has taken a lax approach to gambling, and it shows. We have the highest gambling losses in the world. Pokies and online betting are particularly addictive and harmful, leading to serious harm for hundreds of thousands of Australians.

Pokies are more common in our suburbs than post boxes, ATMs, or public toilets. They are concentrated in our most disadvantaged communities. And they are particularly prevalent in NSW, which has almost as many pokies as the rest of Australia combined.

Meanwhile, online betting has surged, particularly among young men, spurred by a barrage of gambling advertising.

People who gamble, their families, and the broader community pay the price. Gambling can lead to financial and mental distress, relationship breakdown, family violence, and suicide.

How has it come to this? Gambling is big business, and the industry has repeatedly used its political power to thwart efforts to better protect the public. Gambling companies and peak bodies apply pressure to our politicians through every avenue to protect their profits.

Australia must get serious about preventing gambling harm and implement a package of reforms to make gambling less pervasive and safer.

Gambling normalisation starts young, and advertising is a major culprit. The federal government should ban all gambling advertising and inducements. That would go a long way to reducing Australians' excessive exposure to gambling.

We also need a 'seatbelt' for the most dangerous gambling products, to stop catastrophic losses when people lose control. No one should lose their house, or their life, on the pokies.

Mandatory pre-commitment with maximum loss limits would ensure gamblers no longer lose more than they can afford. The federal government should establish a national pre-commitment system for online gambling, and state governments should roll out state-wide pre-commitment schemes for pokies.

In parallel, the federal government should investigate the feasibility of a universal pre-commitment system with maximum loss limits.

Governments should also improve support services to help those suffering harm now.

The gambling industry will push back on these reforms by denying the problems and stoking community fears. But this report shows that their trumped-up claims don't withstand scrutiny. Federal and state governments should brave the vested interests and work together in the interests of all Australians to make gambling a safer, better bet.

Recommendations

Reduce people's exposure to gambling

1. Ban all gambling advertising and inducements.
2. Reduce pokies numbers in each state over time.
3. Add a gambling warning label to games that include gambling-like features, such as loot boxes and social casinos.

Roll out mandatory pre-commitment with maximum loss limits

4. Establish a national mandatory pre-commitment system for all online gambling, with daily, monthly, and annual limits on losses.
5. In each state, introduce a state-wide mandatory pre-commitment scheme for pokies, with daily, monthly, and annual limits on losses.
6. Investigate the feasibility of a single universal mandatory pre-commitment system across all forms of gambling.

Improve gambling support services

7. Make treatment and support services a responsibility of health ministers, and commission a national review of services.
8. Invest in any necessary service improvements and research gaps.

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1 Gambling is Australia's blind spot

Australia has let the gambling industry run wild. We were one of the first countries to deregulate gaming, and we're still dealing with the consequences. Gambling is everywhere: on our screens, in our pubs and clubs, and available anytime at our fingertips.

Many people enjoy gambling without suffering harm. But it is all too easy to lose too much: these products have features that keep people coming back even when they are at risk of harm. That's why gambling is strictly controlled in a number of countries.

Australia has taken a lax approach to regulating gambling, and it shows. We have the highest losses in the world. People who gamble, their families, and the broader community pay the price in their finances, health, and wellbeing.

1.1 Australia has the highest losses in the world

Australia has the highest per-capita gambling losses in the world. Our average annual losses per adult (\$1,635) far exceed the average in similar countries such as the US (\$809) and New Zealand (\$584) (Figure 1.1).

Collectively, Australians lost \$24 billion gambling in 2020-21 (Figure 1.2).

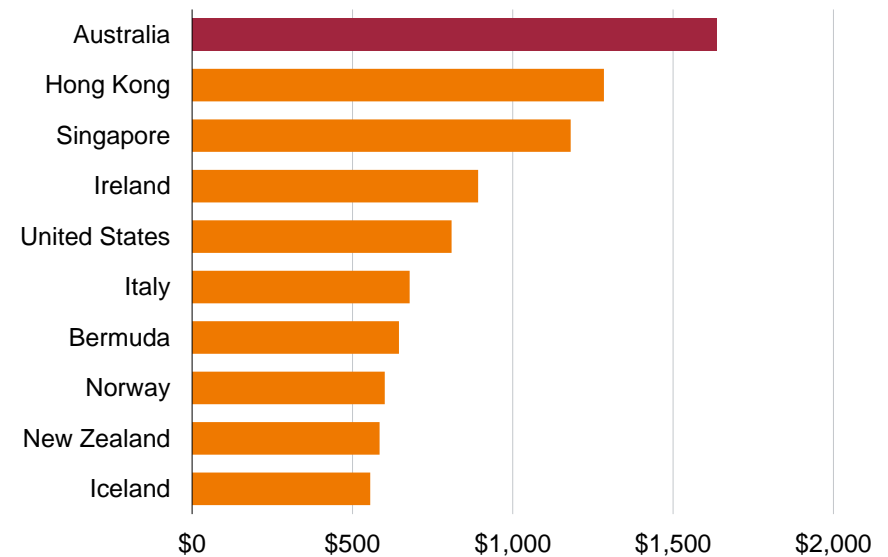
1.2 Gambling is everywhere, addictive, and harmful

Gambling causes harm for too many Australians.

Gambling encompasses a range of activities where people stake money on an uncertain outcome, including lotteries, scratchies,

Figure 1.1: Australia leads the world in gambling losses

Gambling losses per adult in 2022, Australian dollars



Note: Converted to Australian dollars using ATO (2023).

Source: H2 Gambling Capital, cited in Di Stefano and Hutchinson (2023).

pokies,¹ betting,² and casino games. About one in three Australians gamble regularly.³

This report focuses on pokies and betting, the most damaging forms of gambling in Australia today.⁴ Together, pokies and betting account for three-quarters of total gambling losses. About 1.2 million Australians use pokies, and 1.6 million Australians place a bet, in a typical month.⁵

Pokies and betting are everywhere; they're addictive; and they're harmful.

1.2.1 Gambling is everywhere in Australia, unlike the rest of the world

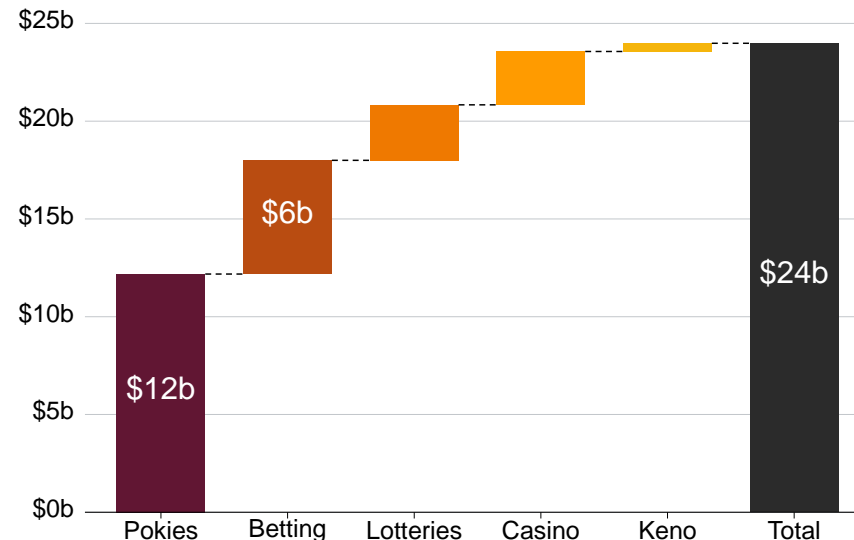
Pokies are in our suburban pubs and clubs, and betting is constantly available at our fingertips. And a flood of advertising, even in the most obviously inappropriate places,⁶ continually prompts us to gamble.

Pokies 'basically on every corner'⁷

Australia had one electronic gaming machine for every 131 people in 2019 – more than almost any other country. The only countries with

Figure 1.2: Australians lose \$24 billion a year gambling, mostly on pokies and betting

Total losses by gambling type, Australia, 2020-21



Notes: An additional \$45 million lost on minor gaming and \$11 million lost on interactive gaming are not shown. The latest national data available are from 2020-21. COVID restrictions in place in some states in that year meant some gambling venues were closed, changing how people gambled: Gainsbury et al (2021) and Brodeur et al (2021). But the data from 2018-19 – the last year unaffected by COVID restrictions – show a similar pattern. Total losses were \$26 billion. Pokies and betting still accounted for three-quarters of losses: \$13 billion on pokies (50 per cent of the total) and \$5 billion on betting (20 per cent). However, casino losses were higher in 2018-19 (\$4.9 billion) than in 2020-21 (\$2.7 billion).

Source: Queensland Government Statistician's Office (2023).

1. Pokies are also known as poker machines, gaming machines, electronic gaming machines, or slot machines.
2. Betting is also known as wagering, and includes sports betting and racing betting.
3. That is, at least once a month. This includes any form of gambling. By far the most common form is lotteries. Only 14 per cent of adults gamble on anything other than lotteries in a typical month: Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023).
4. Other forms of gambling, such as lotteries, are popular, but pose a much lower risk of harm. Casinos are high risk, but less pervasive. See Section 1.5.
5. Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023).
6. Such as junior sports team sponsorships: Martino et al (2021).
7. Charles Livingstone, cited in Miller (2022).

more were Japan, and casino tourism destinations, such as Macao.⁸

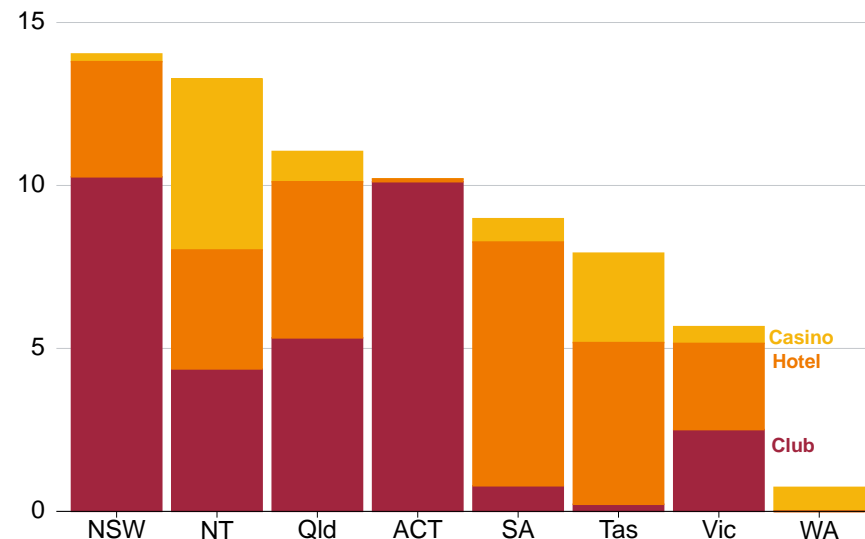
Not only do we have more gaming machines than most other countries, but our machines are also more damaging. Most of Australia's gaming machines are high-intensity poker machines ('pokies'), which have high stakes and a fast rate of play.⁹ The expected loss on the highest-intensity machines, used at their maximum rate, is about \$1,200 an hour for pokies in NSW.¹⁰

In other countries, high-impact, high-loss 'Australian-style' machines are typically confined to casinos.¹¹ But in Australia, they are pockmarked across our suburbs and towns, increasing the risk of harm.

About 93 per cent of Australia's 185,000 pokies are outside casinos.¹² Suburban pokies are more common than ATMs,¹³ post boxes,¹⁴ or public toilets.¹⁵

Pokies are particularly prevalent in NSW (Figure 1.3). There are about 88,000 machines in NSW, or one for every 75 adults.¹⁶ NSW residents

Figure 1.3: NSW has the most pokies per person, and WA the fewest
Number of pokies per thousand adults, 30 June 2021



Sources: ABS (2024a); Queensland Government Statistician's Office (2023).

8. Japan has 4.2 million pachinko and pachislot machines (one for every 30 people): Ziolkowski (2020). A few countries with very small populations (fewer than 120,000 people) were excluded.
9. B. Browne and Minshull (2017).
10. Productivity Commission (2010, p. 11.7).
11. Kruger (2011).
12. Queensland Government Statistician's Office (2023). By one estimate, Australia has 0.3 per cent of the world's population, but 76 per cent of the world's pokies outside dedicated gambling venues (such as casinos and slot halls): B. Browne and Minshull (2017).
13. 23,769: Australian Payments Network (2024).
14. 14,934: Australia Post (2023).
15. 23,921 registered on the National Public Toilet Map: Department of Health and Aged Care (2024).
16. NSW has 87,675 pokies as at August 2024, under a total cap of 95,813: NSW Liquor & Gaming (2024a). The next highest jurisdictions for pokies per capita are the Northern Territory and Queensland (see Figure 1.3).

lost \$1,288 per adult on pokies in 2023, double the average of the other states.¹⁷

In many communities in NSW, particularly poorer communities, it's difficult to find a venue that *doesn't* have pokies (Figure 1.4). More than half of NSW's pubs and clubs have pokies.

People who live close to pokies venues are more likely to gamble, and to gamble more often.¹⁸ Travel costs are lower, and, because pokies venues often host other events and activities,¹⁹ people are incidentally exposed to pokies while going about their lives. This can make it harder to avoid temptation.²⁰

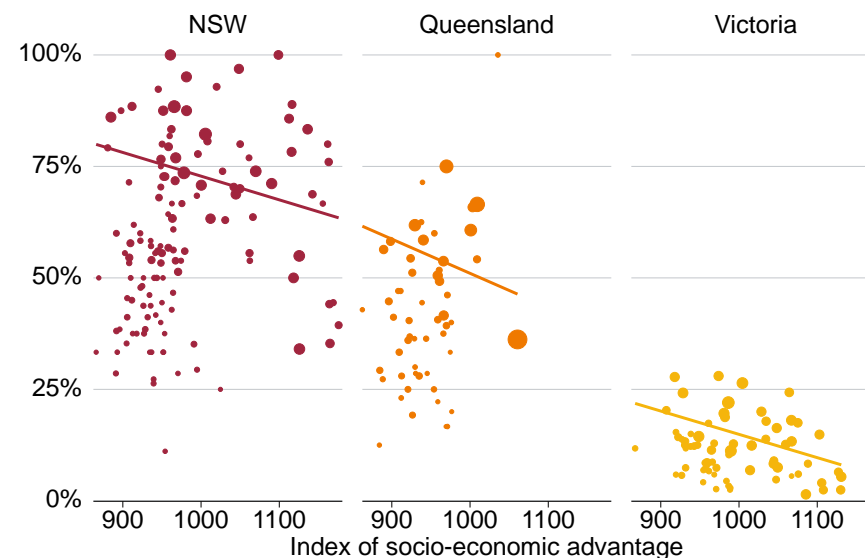
Betting at your fingertips and an inescapable 'torrent of advertising'²¹

Betting – and betting advertising – are also widely accessible. Online betting is available anywhere, anytime: most people who regularly place bets online do so using a mobile or smartphone.²²

Overall losses on betting have grown from \$3.6 billion in 2008-09 to \$5.8 billion in 2020-21.²³ And online betting has surged, now accounting for about 85 per cent of total betting losses.²⁴ The average

Figure 1.4: In some communities, particularly poorer communities, it's difficult to find venues without pokies

Proportion of pubs and clubs in local government area that have pokies



Notes: Each point represents one local government area. The bigger the point, the bigger the population of the local government area. Trend lines are weighted by population. NSW data are from August 2024, and include venues that have a club, hotel, or small bar licence. Queensland data are from August 2024, and include venues that have a community club, commercial hotel, or commercial bar licence. Victorian data are from June 2024 and include venues that have a full club, on-premises, or general licence.

Sources: Grattan analysis of ABS (2022), ABS (2023a), Liquor Control Victoria (2024), Queensland Office of Liquor and Gaming Regulation (2024a) and NSW Liquor & Gaming (2024a).

17. NSW Liquor & Gaming (2024b). NSW losses per adult were at least double the average of the other states every year from 2012-13 to 2020-21, the latest year with complete national data: Queensland Government Statistician's Office (2023).
 18. Young et al (2012); and Badji et al (2023).
 19. Such as family and seniors' activities: Pitt et al (2022), Bestman et al (2016) and Bestman et al (2019).
 20. Mikhed et al (2017).
 21. As Murphy et al (2023, p. iv) put it: 'The torrent of advertising is inescapable.'
 22. 88 per cent of regular online bettors use a mobile/smartphone to bet: Greer et al (2023). This is in addition to offline betting options, including about 4,000 TAB venues around Australia and 70 licensed on-course bookmakers: Tabcorp (2024, p. 15); ACMA (2024a).
 23. In 2020-21 dollars: Queensland Government Statistician's Office (2023).
 24. H2 Gambling Capital (2023).

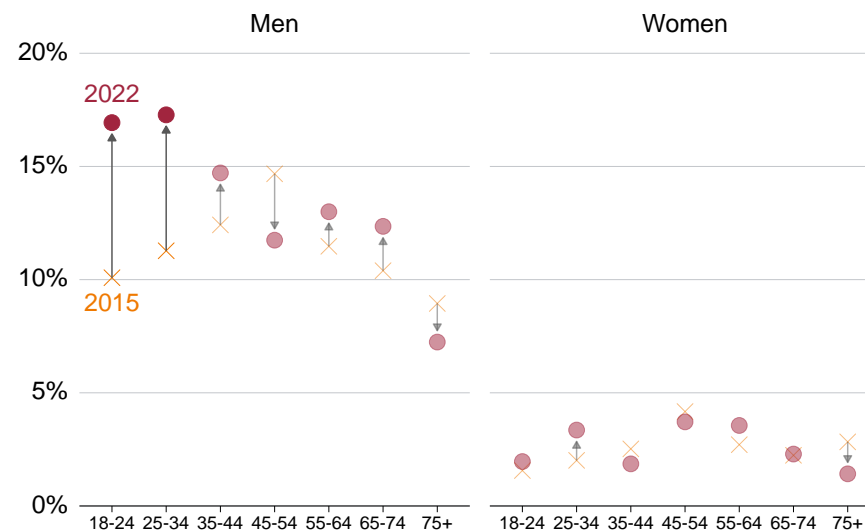
Australian’s betting loss is more than double that of the average UK or US resident.²⁵

About 8 per cent of Australian adults placed a bet at least once a month in 2022. This average hides a stark gender divide: 14 per cent of men bet regularly, compared with just 3 per cent of women. Young men, in particular, have led the recent growth (Figure 1.5). Betting is increasingly embedded in male social environments, reinforced by masculine norms of competitiveness and risk-taking.²⁶

A barrage of gambling advertising spurs these trends, normalising gambling, inducing more spending, and triggering urges for people at risk.²⁷ More than 1 million gambling ads aired on free-to-air TV and metropolitan radio in 2022-23.²⁸ Online gambling companies are responsible for 64 per cent of total gambling advertising spending.

The 2023 Murphy Inquiry²⁹ – a federal parliamentary inquiry into online gambling harm that reached multi-partisan consensus on all 31 recommendations – recommended ending the barrage of gambling advertising with a total ban.³⁰

Figure 1.5: Young men have led the rise in betting
Proportion of age group that placed a bet in a regular month, 2022



Source: Grattan analysis of Melbourne Institute for Applied Economic and Social Research (2023).

25. Ibid.

26. Hunt and Gonsalkorale (2018).

27. McGrane et al (2023) and Murphy et al (2023). For example, in a Queensland Government survey, half of people suffering severe gambling harm, and 23 per cent of people at moderate risk of harm, reported that sports betting advertising led them to increase their betting spending: Office of Liquor and Gaming Regulation (2024, p. 55).

28. Between May 2022 and April 2023. Gambling companies spent \$184 million on radio and TV ads, comprising 77 per cent of their total gambling advertising spend: ACMA (2023).

29. The inquiry was chaired by Labor MP, the late Peta Murphy.

30. Murphy et al (2023).

Gambling advertising is particularly prominent around sport. As well as direct broadcast advertising,³¹ betting companies sponsor stadiums³² and teams,³³ meaning their logos are visible throughout the game. Most major sporting codes have ‘partnerships’ with online betting companies and receive a cut of the money bet on their games – so they have financial incentives to promote gambling among fans.³⁴ Official apps display the odds for every game alongside the score.³⁵

Betting companies also use online advertising,³⁶ direct marketing, and inducements³⁷ to entice gamblers, including those who are vulnerable to gambling harm (or, from the companies’ perspective, lucrative VIPs).³⁸

31. There are some restrictions on when gambling ads can be broadcast. Generally, gambling ads are supposed to be socially responsible (e.g. not directed at children and not misleading) and include a responsible gambling message. Gambling ads are not allowed during children’s programs, but still screen regularly on daytime TV and streaming services. Gambling ads and promotion of betting odds are not allowed during daytime live sport, but the ban only kicks in five minutes before play and is lifted five minutes after. Gambling logos on jerseys and stadiums are still allowed. After 8.30pm, gambling ads are allowed during breaks in play. Some state laws go further; for example in South Australia gambling advertising cannot be broadcast on TV between 4pm and 7.30pm, Monday to Friday: Murphy et al (2023).

32. e.g. BlueBet Stadium in Sydney.

33. e.g. the Newcastle Knights, the North Queensland Cowboys, and the Redcliffe Dolphins in the NRL.

34. For example, the AFL has a partnership with Sportsbet that is estimated to be worth between \$30 million and \$40 million a year: McClure (2022).

35. Samios (2024).

36. Online advertising accounted for about 23 per cent of total gambling advertising spend between May 2022 and April 2023: ACMA (2023).

37. Promotions such as bonus bets or deposit matching, which can create the illusion that gambling isn’t risky: Murphy et al (2023, p. 72).

38. Bogle (2023); and Cannane and Taylor (2020).

The pervasiveness of gambling is no accident

The pervasiveness of gambling is no accident: it’s the result of decades of policy choices that have allowed the gambling industry, and its associated harm, to proliferate.

Australian governments were some of the first in the world to deregulate gaming.³⁹ The NSW Government legalised pokies in the community in 1956; few other countries (or states) followed suit until the 1990s.⁴⁰ Even today, only a small number of countries allow high-intensity pokies outside of dedicated gambling venues (such as casinos).⁴¹ However, in Australia, only WA limits access to gaming machines in this way.

Australian regulations are well behind international best practice in other areas too. Several European countries have introduced mandatory limits to reduce catastrophic harm (Appendix A), and others have banned or heavily restricted gambling advertising.⁴²

The main reason Australia’s regulations are so weak is the influence of the gambling industry. Past reform efforts have been killed by highly organised, well-funded industry campaigns (Chapter 2).

1.2.2 Gambling is addictive

The pervasiveness of pokies and betting is particularly dangerous because these products are not like ordinary consumer products.⁴³

39. Productivity Commission (1999).

40. Chambers (2011, p. 32).

41. B. Browne and Minshull (2017).

42. Including Italy, Belgium, and Spain: Rossi et al (2023).

43. In France, gambling is now recognised as a harmful product, not a regular consumer product, because it carries significant risks of abuse and public health risks such as addiction and social isolation: Gallus (2023).

They can be harmfully addictive, and consumers are vulnerable to misunderstanding the product.⁴⁴

The wiring of our brains makes us vulnerable to gambling harm. We use a range of cognitive heuristics that make it hard for us to make 'rational' gambling choices: for example, we often incorrectly believe that we can predict or control completely random events.⁴⁵

The unpredictable size and pattern of many gambling wins and losses continually activates the brain's reward system, reinforcing the behaviour.⁴⁶ And quitting gambling activates brain regions related to subjective pain, anxiety, and conflict.⁴⁷

Designers and manufacturers of all sorts of products seek to maximise revenue by making their products more attractive. But, in the case of some gambling products, this process has adverse consequences, with product design aggravating addictiveness to maximise losses.⁴⁸

For example, over time, gaming machines have evolved from simple mechanical machines to advanced machines with complex payoff structures, audiovisual elements, and playing styles. Contemporary gaming machines have much greater potential for addiction and losses than their primitive forebears.⁴⁹

Pokies' audiovisual features, variable payouts, near misses, and losses that appear to be wins⁵⁰ all provide regular dopamine hits and hijack the brain's core decision-making processes.⁵¹ Some people find it difficult to walk away from pokies when they are 'in the zone', losing track of time and reality, and feeling that they are in a trance.⁵²

Online betting products also have high potential for addiction and harm. Online gambling is accessible, immersive, and enables seamless, high-speed spending.⁵³ Online betting products increasingly share some of pokies' design characteristics, such as short payout intervals and high betting frequency, large-but-improbable jackpots with complex bets, and perceived 'near misses'.⁵⁴

These features make it difficult for people to regulate their gambling. Many people have difficulty controlling their gambling and don't remember their wins or losses.⁵⁵ In one survey, about a quarter of Australian households who reported that they spend money on pokies or betting said they were net winners – figures which are inconsistent with overall losses.⁵⁶

For some, these problems develop into a clinical gambling addiction,⁵⁷ characterised by differences in brain structure⁵⁸ that lead to a loss of

44. By contrast, lotteries and scratchies pose a lower risk of addiction because they are slower, with fewer bells and whistles: Delfabbro and Parke (2021) and Productivity Commission (2010).

45. Grant et al (2011); and Fortune and Goodie (2012).

46. Stetzka and Winter (2023); Murch and Clark (2021); and Clark et al (2019).

47. Sapolsky (2023, p. 35).

48. Yücel et al (2018); and Schüll (2014).

49. The chief executive of Aristocrat Leisure, a leading pokies designer and manufacturer, described one game as 'the single most valuable piece of intellectual property ever patented in Australia': Alexander (2024).

50. For example, a 50-cent win on a \$1 bet might be accompanied by flashing lights and music, even though the gambler has still lost money overall.

51. Myles et al (2023); M. Browne et al (2023); and Murch and Clark (2016).

52. Murch and Clark (2021).

53. Murphy et al (2023, p. 6); and Flayelle et al (2023).

54. For example, when three out of four legs of a same-game multi are successful: Newall et al (2021).

55. Productivity Commission (2010, p. 4.1).

56. Grattan Institute analysis of ABS (2017). In another study that compared reported betting spending with actual account records, 65 per cent of online betters underestimated their spending: Heirene et al (2022).

57. American Psychiatric Association (2013); and World Health Organization (2024).

58. People with gambling disorder have thinner grey matter in parts of the prefrontal cortex associated with decision-making under uncertainty, and they experience

control of gambling spending and a significant risk of harm.⁵⁹ Gambling addiction is recognised by the World Health Organization alongside alcohol and drug addiction.⁶⁰ People with gambling addiction have similar brain activation and behavioural changes to people dependent on alcohol, nicotine, or cocaine.⁶¹

1.2.3 Gambling causes harm

Gambling can harm people's financial security, health, and broader wellbeing. In some cases, the consequences can be catastrophic, including job loss, bankruptcy, fraud, relationship breakdown, family violence, and suicide.⁶² These effects ripple through our communities.⁶³

Gambling causes financial and mental distress

People who gamble have lower financial wellbeing than those who don't (even after accounting for other financial and demographic characteristics).⁶⁴ Those who gamble at very high levels are particularly

more brain activation in response to gambling wins, and less brain activation in response to losses: Raimo et al (2021). See also Murch and Clark (2016) and Bergen et al (2012).

59. Zhang and Clark (2020); and Navas et al (2017).

60. World Health Organization (2024).

61. García-Castro et al (2023); and Vaccaro et al (2024).

62. Wardle et al (2018).

63. Productivity Commission (2010) estimated that the social cost of gambling was about \$6.8 billion (inflated to 2024 dollars). M. Browne et al (2017) estimated that the social cost of gambling in Victoria alone was about \$9 billion (inflated to 2024 dollars).

64. Comerton-Forde et al (2022). This study was based on bank data. Gambling was measured as whether the customer had any gambling transactions in their account. This mainly captures transfers to betting accounts and lotteries; it excludes pokies. Financial wellbeing was measured based on indicators of financial security (such as savings) and insecurity (such as arrears, declines, or dishonours) in the bank's data. The study also asked customers about their perceptions of their financial wellbeing. Gambling was not associated with this subjective measure.

likely to miss loan payments, use unplanned bank overdrafts, and take out payday loans.⁶⁵ In extreme cases, gambling has been linked to job loss and homelessness.⁶⁶

Gambling is also linked to poorer health, relationships, and wellbeing. Some people who gamble feel shame, worry, or distress about their gambling, or the financial stress that results.⁶⁷ And gambling can impair family and social relationships – either as a direct source of tension, or because people gamble on their own rather than engage in other leisure activities.⁶⁸

In extreme cases, gambling can be a contributing factor for suicide.⁶⁹ At least 4 per cent of suicide deaths in Victoria between 2009 and 2016 were linked to gambling.⁷⁰ In one study, one in six people presenting to an emergency department for mental health care met the criteria for 'problem gambling'.⁷¹ Most gambling financial counsellors report that they have seen clients attempt suicide. Some also report that they have seen family members of people with severe gambling harm take their own lives.⁷²

It is difficult to isolate the harm caused by gambling; many studies only prove a correlation between gambling activity and harm. People who have other mental health or substance use disorders are more likely to gamble, making it difficult to disentangle gambling's effects.⁷³

65. Even after controlling for age, gender, and annual income: Muggleton et al (2021).

66. M. Browne et al (2017); and Vandenberg et al (2022).

67. M. Browne et al (2017).

68. Ibid.

69. Edson et al (2023a); and Slutske et al (2022).

70. This may under-estimate the true number: coroners do not routinely investigate whether gambling is a cause of suicide, so it may not be recorded even when it is a contributing factor: Rintoul et al (2023).

71. Castella et al (2011).

72. Financial Counselling Australia (2022).

73. Buchanan et al (2020); Grant and Chamberlain (2020); and Lorains et al (2011).

But these confounding factors don't explain all of the relationship between gambling and harm.⁷⁴ When exposure to gambling products increases, for example because of regulatory changes, harm increases – even though underlying rates of mental health or substance use disorders are unlikely to have shifted over the same period.⁷⁵ And in any case, gambling losses make a bad situation worse and harder to overcome.

Gambling harm is broader than 'problem gambling'

In 2022, 1.7 per cent of adults – about 338,000 people – suffered acute gambling harm, meeting the criteria for 'problem gambling'.⁷⁶ About two-thirds of them were men.⁷⁷

So-called 'problem gamblers' make up only a small fraction of the population at a given point in time. But gambling problems can develop quickly, without much warning, so many more people are at risk of experiencing harm at some point in their lives.⁷⁸

Gambling harm is not limited to current or future 'problem gamblers'.⁷⁹ About 8 per cent of regular gamblers report at least one indicator of

74. Slutske et al (2022); and Edson et al (2023b).

75. S. R. Baker et al (2024); Hollenbeck et al (2024); and Mikhed et al (2017).

76. Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023). Measured using the Problem Gambling Severity Index, which includes nine questions, covering whether people bet more than they could afford, felt guilty, went back on another day to win back money, felt they had a gambling problem, needed to gamble with larger amounts of money, had been criticised for betting, had health problems caused by gambling, had financial problems caused by gambling, or borrowed money or sold possessions to gamble: Ferris and Wynne (2001).

77. Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023).

78. Suomi et al (2024). In UK bank data, about a quarter of the heaviest gamblers were not spending any money gambling three years before: Muggleton et al (2021).

79. M. Browne et al (2017).

risky gambling – such as betting more than they can afford to lose, or feeling guilty about gambling – without meeting the clinical threshold for 'problem gambling'. At least 500,000 Australians have asked their bank to put a gambling transaction block on their account.⁸⁰

Family members, friends, and colleagues can also suffer financial and mental stress and relationship conflict as a result of someone else's gambling.⁸¹ About 700,000 people live with someone suffering serious gambling harm.⁸²

Gambling is also linked to domestic and family violence.⁸³ Financial and emotional stress – particularly men's anger or shame – from gambling can heighten the risk of violence.⁸⁴ And some people use gambling as a form of escape from violence, compounding the harm.

On top of this, the broader community bears the costs of crime, health care, job losses, and other issues related to gambling.⁸⁵

Pokies and betting pose particularly great risks of harm

Pokies and betting are particularly dangerous forms of gambling.

More access to pokies leads to more harm. An increase in pokies venues in a community results in higher rates of bankruptcy.⁸⁶ People who live within 250 metres of a venue with pokies are about 30 per cent more likely to suffer financial hardship and poor mental health than those living more than 2 kilometres away, even after accounting

80. Australian Banking Association (2024).

81. Tulloch et al (2022); Whetton et al (2021); and Tulloch et al (2023).

82. That is, live with someone classified as 'problem gambler' on the Problem Gambling Severity Index. Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023).

83. Markham et al (2016).

84. Hing et al (2020); and Campbell et al (2024).

85. Wan et al (2024); and Productivity Commission (2010).

86. Badji et al (2020); and Mikhed et al (2017).

for other socio-economic characteristics of the local area.⁸⁷ And severe gambling harm is less common in Western Australia, where pokies are less accessible in the community.⁸⁸

Nationally, about half of people suffering severe gambling harm reported that pokies were the form of gambling they lost the most on.⁸⁹

Harm from pokies is relatively well-studied, because pokies have been popular for decades. There is less research on online betting, but there is emerging evidence of significant harm. In 2022, about 30 per cent of people suffering severe gambling harm reported that their biggest source of losses was betting.⁹⁰ And in the US, people living in states where online sports betting has been legalised are more financially stressed, with particularly large effects for financially vulnerable households.⁹¹

1.3 The industry is built on harmful gambling

*'Problem gamblers might be hard to find in the adult population, but the opposite is true in gaming venues.'*⁹²

Gambling is big business, and the industry has high profit margins.⁹³

87. Badji et al (2023).

88. Russell et al (2023).

89. This estimate includes people whose pokies losses were equal highest with losses on another form of gambling: Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023).

90. This estimate includes people whose betting losses were equal highest with losses on another form of gambling: Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (ibid).

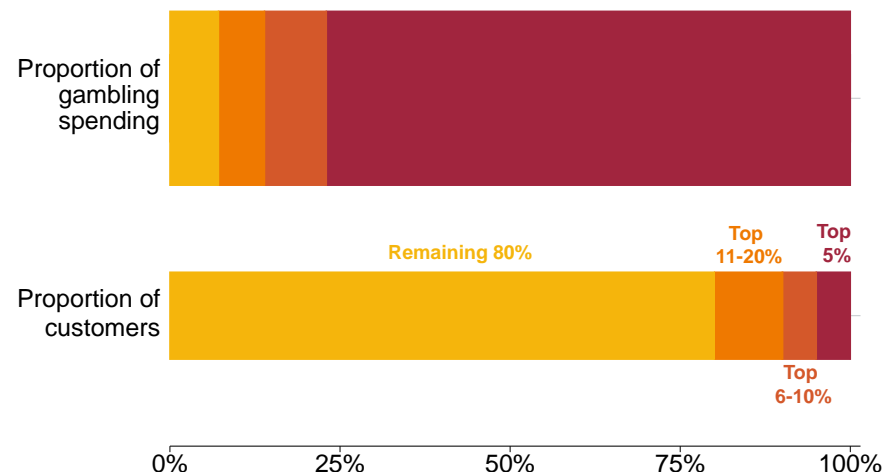
91. The indicators of financial stress include smaller credit card repayments, higher credit card debt, more bank overdrafts, more bankruptcies, more debt collections, and more loan delinquencies: S. R. Baker et al (2024) and Hollenbeck et al (2024).

92. Productivity Commission (2010, p. 17).

93. Betting has the highest profit margin at 14.4 per cent, clubs at 4.6 per cent, and while casinos reported losses in recent years because of the pandemic and

Figure 1.6: Gambling spending is highly concentrated

Debit card gambling spending, among customers with at least one gambling transaction



Notes: This figure is based on consumer debit card transactions data from a bank, covering the year to 19 May 2024. Transactions are classified according to merchant category code. Gambling transactions include lottery, casino, racing, and betting transactions. Spending on pokies is not captured in the debit card data.

Source: Bank data.

These profits rely heavily on a small share of high-spending individuals. Just 5 per cent of gamblers account for 77 per cent of gambling spending using debit cards (Figure 1.6). This top 5 per cent spend 10 times as much as the bottom 80 per cent combined.

regulatory action, they previously reported high profit margins of about 13 per cent: IBISWorld (2024a), IBISWorld (2024b) and IBISWorld (2024c).

The debit card data do not include pokies spending, but surveys suggest that spending on pokies is also highly concentrated.⁹⁴ And pokies losses are unevenly spread, with poorer communities bearing the brunt (Figure 1.7).⁹⁵

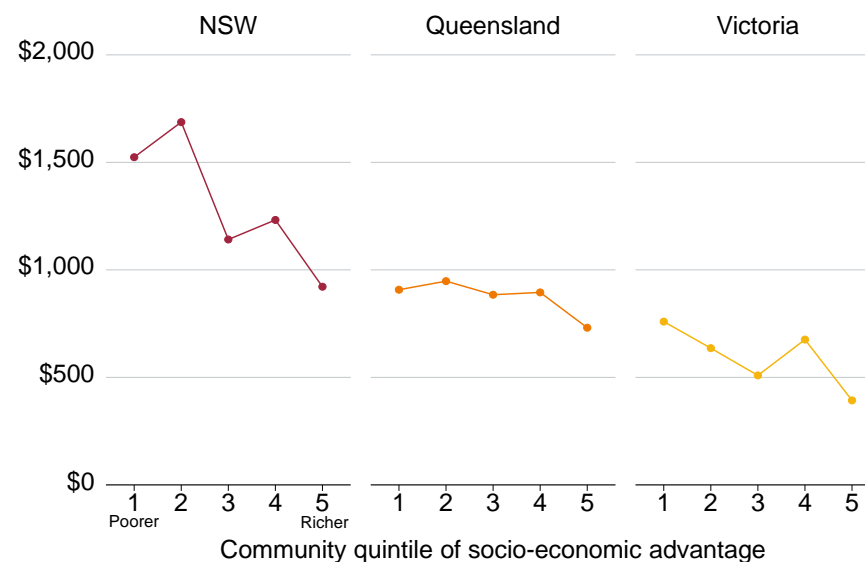
People living in the poorest fifth of communities in NSW lose an average of \$1,524 a year on pokies, compared with \$922 for people living in the most well-off fifth.⁹⁶ Residents of Fairfield, one of the poorest communities in Sydney, lose \$3,967 a year on pokies – three times the state average.

In Victoria, the communities of Brimbank and Dandenong – both disadvantaged – have led the state in pokies losses per person for at least a decade.⁹⁷

These same three communities – Fairfield in Sydney, and Brimbank and Dandenong in Melbourne – stand out for other gambling spending too.⁹⁸

Gambling losses can exacerbate existing vulnerabilities. Within a given community, people with lower incomes are much more likely to suffer financial hardship when living close to a pokies venue.⁹⁹ And people who have experienced trauma (including veterans),¹⁰⁰ mental

Figure 1.7: Average pokies losses are greater in poorer areas
Average annual pokies losses per adult



Notes: The quintiles are population-weighted quintiles of relative socio-economic advantage and disadvantage. For each state, we order all local government areas (LGAs) from most disadvantaged to most advantaged, then split them into five groups with roughly equal population. For example, the first quintile includes the most disadvantaged LGAs with about 20 per cent of the state population. NSW data are for the year to December 2023. For a few small LGAs in NSW, losses are combined in the data. We apportion the losses to each LGA according to how many pokies each has. Queensland data are for the year to June 2024. Queensland does not report losses for LGAs with fewer than six pokies venues, so these LGAs are excluded. Victorian data are for the year to June 2024.

Sources: ABS (2022), ABS (2023a), NSW Liquor & Gaming (2024b), VGCCC (2024a) and Queensland Office of Liquor and Gaming Regulation (2024b).

94. In survey data, the top 5 per cent of pokies spenders accounted for about half of total spending in 2022: Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023).

95. Bubonya and Byrne (2020); and Slutske et al (2019).

96. See notes to Figure 1.7.

97. VGCCC (2024a).

98. Bank data (see Figure 1.6) show that people in Fairfield in Sydney, and Brimbank and Dandenong in Melbourne, are over-represented among heavy spenders on lotteries, casino, racing, and betting. Almost 10 per cent of gamblers in these communities are in the national top 5 per cent of spenders.

99. Badji et al (2023).

100. Metcalf et al (2022). This makes some RSL clubs' reliance on pokies all the more concerning: Belot (2023a).

ill-health, and other stressors or vulnerabilities are at an increased risk of gambling harm. Aboriginal and Torres Strait Islander communities have higher rates of gambling harm than other communities.¹⁰¹

1.4 Prevention is better than cure

The best way to prevent gambling harm is to make gambling products safer and less ubiquitous. Governments should adopt a public health approach that aims to prevent gambling harm across the population, rather than consigning responsibility to individuals.¹⁰²

'Gamble responsibly' has failed

Government initiatives to reduce gambling harm rely too much on individual responsibility for gambling behaviour.¹⁰³ For example, government campaigns have exhorted gamblers to 'show gambling who's boss', 'become the type of man who controls the bet', or, simply, 'gamble responsibly'.¹⁰⁴

The individualistic approach is promoted by the gambling industry.¹⁰⁵ Blaming problems on a small group of 'aberrant' individuals absolves the industry of responsibility, and diminishes the case for stronger action by governments.

There are two main problems with this approach.

First, it doesn't work. Individual responsibility approaches ask people to unilaterally overcome the lure of ubiquitous, highly addictive products – a very difficult task.¹⁰⁶

101. Murphy et al (2023).

102. Murphy et al (2023); Productivity Commission (2010); and Livingstone (2023a).

103. Livingstone and Rintoul (2020); and Price et al (2021).

104. Marko et al (2022).

105. Livingstone (2023a); and Abbott (2020).

106. Systematic reviews show that individual-level interventions are generally ineffective because of low voluntary adherence: McMahon et al (2019).

Many 'responsible gambling' campaigns focus on raising awareness, as if lack of information about gambling harm is the main problem. Many gamblers are aware that gambling is harming them but still find it difficult to stop.¹⁰⁷ And any value of these campaigns as a reminder is drowned out by the torrent of gambling advertising.

Second, individual responsibility approaches stigmatise people caught in the grip of gambling, compounding harm, and making it more difficult for them to seek help.¹⁰⁸

A public health approach recognises that harmful gambling arises from a complex interplay of individual and environmental factors. Australian governments have started to acknowledge the value of this approach, for example in the 2018 National Consumer Protection Framework for Online Wagering, the 2023 Murphy Inquiry, and shifting regulatory approaches in some states.¹⁰⁹ But much more needs to be done.

1.5 The structure of this report

Chapter 2 shows that governments have failed to take the necessary steps to prevent gambling harm, mainly because of the political risks of taking on the industry and its allies.

Chapter 3 outlines a roadmap to prevent gambling harm, by reducing people's exposure and rolling out tools that will make gambling safer.

Chapter 4 explores how governments can ensure reforms stick, by standing up to the vested interests, rebutting their self-interested claims, and coordinating reform efforts across jurisdictions.

107. Armstrong et al (2020).

108. The internalisation of personal responsibility messages can lead to stress and worse health outcomes: Marko et al (2022).

109. For example, VGCCC (2022).

What this report is not about

Some forms of gambling, particularly pokies, can facilitate crime and money laundering. We do not focus on these issues, although our recommendations would still help to reduce money laundering.¹¹⁰

Gambling taxes are a source of revenue for state and territory governments. Our recommendations would reduce overall gambling spending and, hence, this tax revenue over time. Collectively, we would be better off – the social costs of gambling are large, and borne by governments and society.¹¹¹ But governments would need to find other revenue. Tax reform is not the focus of this report, but Grattan Institute has previously made recommendations for governments to improve their tax mix.¹¹²

This report mainly focuses on reducing the harm caused by pokies and betting. Other forms of gambling can undoubtedly be harmful, but are either lower risk¹¹³ or less common,¹¹⁴ so receive less attention in this report.

Casinos have been the subject of recent Royal Commissions and major inquiries.¹¹⁵ State governments should follow through on these reforms.

Our recommendations to prevent pokies harm include casinos as pokies venues.¹¹⁶ And our recommendations to prevent harm from online betting extend to other legal forms of online gambling, including online lotteries and online Keno.¹¹⁷

110. NSW Crime Commission (2022) investigated this issue in depth. One of its main recommendations was introducing a mandatory cashless system for pokies, similar to our recommendation in Chapter 3.

111. M. Browne et al (2017).

112. Wood et al (2023); Daley et al (2018); and Daley and Wood (2015).

113. For example, lotteries and scratchies are popular, but relatively low risk. They tend to be slower, with fewer bells and whistles, lessening the potential for addiction and harmful patterns of use. Rates of serious gambling harm are lower for people who only gamble on lotteries than for other gamblers: Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023).

114. For example, casinos are a high-risk environment for gamblers, but are not part of daily life for most people. Only 0.6 per cent of Australian adults report gambling on casino games at least once a month: Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (ibid).

115. Bell (2022); Finkelstein (2021); Gotterson (2022); and Owen et al (2022).

116. About 7 per cent of Australia's pokies are in casinos: Queensland Government Statistician's Office (2023).

117. Online casino games are banned in Australia, making this one area where our regulations are comparatively strong: *Interactive Gambling Act 2001* (Cth).

2 Governments have failed to protect Australians from gambling harm

Gambling is considered a heavily regulated industry in Australia, but current regulations are not particularly effective in reducing harm, let alone preventing it.

Powerful vested interests are the major barrier to reform. Grattan Institute's 2018 report *Who's in the Room?* showed how effective the gambling industry is in influencing Australian politics, punching well above its weight. Organised attempts to influence policy can create windfall gains for a few, at the expense of the many.

Many past attempts to strengthen consumer protections for gambling have been thwarted by vested interests, so gambling reform is now considered very politically risky. This political reality needs to be grappled with (Chapter 4). But it does not excuse weak regulation. Governments have a responsibility to act in the public interest, even when it is politically challenging.

2.1 There are big holes in consumer protection

Australia's gambling regulation is a mess and does little to reduce harm, let alone prevent it. Federal and state governments have different responsibilities, but neither are doing enough.

2.1.1 A mess of rules that do not prevent harm

Australian governments have historically legalised and promoted a wide range of gambling options.¹¹⁸ Today, governments oversee a tangled

web of rules and codes for Australian gambling providers¹¹⁹ that leaves big holes in consumer protection.

The federal government has responsibility for online gambling but is yet to step up and really own this role. Online gambling is currently regulated through 60 pieces of federal and state legislation, industry codes of practice, multiple federal ministries, and the racing and gaming portfolios of state and territory governments.¹²⁰ One positive recent development is a national self-exclusion register for online gambling (Box 1). But people still cannot consistently self-exclude from all forms of gambling.

State governments regulate casinos, pokies, the racing industry, and other land-based gambling, with different rules in different states.

One of the few common rules is a ban on the use of credit when gambling – credit cards are banned for gambling in casinos, hotels, clubs, at TAB outlets, and online.¹²¹

Most other regulations at best aim to slow the rate at which people lose money. For example, states prescribe maximum bets per spin, time between spins, load-up limits, and other pokies design features;¹²² and

118. Betting on horse races and Two Up has been legal and popular in Australia since the early 1800s: Russell (2023) and Pinto and Wilson (1990).

119. Gambling operators must have an Australian licence to advertise and sell to Australians. The Australian Communications and Media Authority (ACMA) blocks illegal offshore providers, mostly successfully (Section 4.2.4 on page 46). ACMA can pursue publishers advertising a prohibited interactive gambling service, but only if most people who access the content are physically present in Australia: *Interactive Gambling Act 2001* (Cth), section 61EA.

120. Victorian Public Accounts and Estimates Committee (2023); and Murphy et al (2023).

121. *Interactive Gambling Act 2001* (Cth). Although even here there are some loopholes and exclusions for lotteries and trackside bookmakers: Mizen (2024a) and Department of Social Services (2022).

122. Livingstone (2017).

regulate opening hours, service of food and alcohol,¹²³ responsibilities to intervene,¹²⁴ and reporting requirements.¹²⁵ Collectively, these rules – if enforced – may reduce gambling harm but ultimately don't prevent it and fail to protect against catastrophic losses.

No state or territory has yet implemented the best, simplest approach to preventing gambling harm: mandatory pre-commitment (see Chapter 3).¹²⁶ Tasmania is currently implementing a scheme for pokies that will be best in class when it is operational by late 2025.¹²⁷ Victoria and Western Australia have also announced mandatory pre-commitment schemes for pokies to be rolled out in the next year or so.¹²⁸ And Queensland will introduce a mandatory pre-commitment scheme by the end of 2025, but it will be limited to casinos.¹²⁹ These are critical steps in the right direction, but there is still a long way to go (Chapter 3). NSW has been especially timid in its efforts.

2.1.2 Many rules are not even enforced

Inquiries at the state and federal level in recent years have identified regulatory failures in consumer protection, including over-reliance on individual responsibility,¹³⁰ over-reliance on the industry to

123. For example, in Victoria, venues cannot serve food or drinks to people using pokies: VGCCC (2024b). In NSW, venues cannot offer free drinks to induce gambling, but it still happens in some cases: Cannane (2019).

124. e.g. NSW Liquor & Gaming (2024c).

125. e.g. to AusTRAC or to the state/territory regulator.

126. Mandatory pre-commitment is currently only in place in Crown Casino Melbourne, and only for pokies, not for table games. Crown Perth has a voluntary pre-commitment system that will be made mandatory by December 2025: WA Government (2023).

127. Ferguson (2022).

128. Andrews (2023a); and WA Government (2023).

129. D'Ath (2024).

130. e.g. see Murphy et al (2023, pp. 20–21).

Box 1: One shining light – BetStop

Australians now have a way to self-exclude from all (legal) online betting. BetStop is the National Self-Exclusion Register, launched in August 2023.^a

Australians can register with BetStop to self-exclude from all licensed online and phone gambling for a minimum of three months and up to a lifetime. About 22,000 people had self-excluded as at July 2024. Half of those on the register were younger than 30.^b

Providers^c are not allowed to open an account for, accept a bet from, or market to self-excluded individuals.

BetStop still leaves gaps in the coverage of online gambling: BetStop was established under the Interactive Gambling Act, which excludes lotteries and Keno.^d

And the BetStop system can't exclude people from any land-based forms of gambling.

Some states have self-exclusion schemes for land-based gambling. The South Australian scheme enables people to self-exclude from casinos, pokies venues, racing, and lotteries, and includes a third-party exclusion option for friends or family members to intervene.^e NSW is developing a similar scheme.

a. Rowland and Rishworth (2023).

b. ACMA (2024b).

c. There are currently more than 150 online and phone interactive gambling providers licensed in Australia: ACMA (2024a).

d. Grogan et al (2023). The government is currently reviewing this exclusion: Rowland and Rishworth (2024).

e. SA Office for Problem Gambling (2021).

self-regulate,¹³¹ little follow-up or enforcement,¹³² and inadequate penalties.¹³³

Most venue-based consumer protections rely on individual staff to track gambling risk and know when and how to step in – a difficult task which staff have little incentive to undertake.

Recent Royal Commissions and reviews of casinos in NSW, Victoria, Queensland, and WA paint a grim picture of flagrant disregard for their communities and the rules under which casino licences are granted.¹³⁴

Many regulators don't do enough to check that operators adhere to their licence conditions. Some regulators appear to be well out of their depth: the Perth Casino Royal Commission found the regulator lacked an 'adequate or accurate understanding of its role', and the Victorian Royal Commission found that Crown Melbourne 'bullied the regulator'.¹³⁵

Even where misconduct is investigated, and a gambling provider is found to have breached its licence, the fines are often so low that they can simply be accommodated as a cost of doing business.¹³⁶ The Murphy Inquiry found that 'current penalties for breaches of online WSPs' [wagering service providers'] responsibilities to their customers

neither match the seriousness of the breaches nor provide an adequate deterrent to change behaviour'.¹³⁷

2.1.3 Gaps in the current regulatory arrangements

There are many gaps in the regulation of gambling in Australia. Legislation is outdated, and regulators lack the powers (and data) they need to do their job.¹³⁸

There are few measures in place that directly prevent gambling harm. Mandatory pre-commitment with upper limits on losses could provide that safety net (see Chapter 3).

The lack of good public and administrative data on gambling activity also undermines regulators' ability to identify and prevent harm, and makes independent analysis difficult.¹³⁹ The most detailed data on gambling activity is held by the gambling companies themselves.

Most prominently, the federal government has taken more than 14 months to respond to the Murphy Inquiry into online gambling, which handed down 31 recommendations in 2023 with multi-partisan backing. A core recommendation of the inquiry was a full ban on gambling advertising. The delayed response has left big gaps in consumer protection, and demonstrates once again how politically challenging it is to achieve good policy in this space (Section 2.2.2).

131. e.g. 'Significant proceeds of crime were placed in EGMs [electronic gaming machines], including in objectively suspicious circumstances, but failed to trigger the suspicions of staff at the relevant venues': NSW Crime Commission (2022, p. 12).

132. e.g. 'The department's regulatory program is not effective in holding the gambling industry to account': Queensland Audit Office (2024, p. 2).

133. e.g. A fine levelled by the Northern Territory Racing Commission against Ladbrokes represented less than one tenth of the money Ladbrokes retained from the victims: Murphy et al (2023, p. 85).

134. Bell (2022); Finkelstein (2021); Gotterson (2022); and Owen et al (2022).

135. Owen et al (2022, p. 9); Finkelstein (2021, p. 3).

136. For example, NSW pubs and clubs that breach harm minimisation rules only face fines up to \$5,500: NSW Liquor & Gaming (2023).

137. Murphy et al (2023, p. 85).

138. Levin (2022).

139. A lack of data has frustrated many recent reviews and inquiries. For example, a NSW inquiry into money laundering via pokies found: 'Even utilising the combined holdings of law enforcement agencies and coercive functions, the Inquiry was not able to get a complete picture of criminal activity due to a lack of data': NSW Crime Commission (2022, p. v).

2.1.4 Barriers to effective treatment and support

As well as inadequate prevention measures, there are also deficiencies in the system that is meant to help people suffering acute gambling harm.¹⁴⁰

Gamblers face big barriers to seeking help in the first place. Many people feel shame or stigma about ‘having a gambling problem’, internalising the ‘responsible gambling’ messages that paint excessive gambling as a failure of self-control (Chapter 1).¹⁴¹ Just a fraction of people suffering gambling harm actually seek help.¹⁴² Even fewer seek help early, before they reach a crisis point, because many people believe that only ‘problem gamblers’ need help.¹⁴³

Aboriginal and Torres Strait Islander people, people from culturally and linguistically diverse backgrounds, and people living in rural and remote communities face particularly big barriers to getting support.¹⁴⁴

Health and social service professionals in other areas often fail to recognise or refer people with gambling problems. For example, people with mental ill-health or substance use problems have higher rates of

gambling problems than the general population,¹⁴⁵ but screening and referral pathways are inconsistent, and gambling problems can go unrecognised or unaddressed.¹⁴⁶

There is no guarantee that even people who overcome these barriers and find a support service receive effective support.¹⁴⁷

There is no established best-practice model of care in Australia; each service designs its own treatment protocol, with limited clinical evidence to draw on.¹⁴⁸ In some states, treatment services are not regularly evaluated, so governments and providers don’t know if the services they are providing actually work.¹⁴⁹ And different kinds of support, such as psychological support (including for co-occurring mental health conditions) and financial counselling, are rarely integrated.

2.2 Why governments haven’t taken stronger action

There are two main reasons that Australian gambling regulation is so weak. The first is that state governments rely on the tax revenue from gambling. The second is that gambling is such a politically powerful industry, with many powerful allies, governments are scared to take them on.

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140. There are various online and telephone helplines, as well as local gambling counsellors, funded by the state and territory governments. In addition, the federal government spent about \$9 million in 2022-23 on the National Debt Helpline and financial counselling for people suffering gambling harm: Murphy et al (2023, p. 20). And people can get help for gambling problems from a GP or mental health professional.
141. Gambling problems are a serious health issue, but are dismissed in the public consciousness as a problem of poor self-control or decision-making: Murphy et al (ibid, p. 50).
142. Surveys suggest that between 15 per cent and 26 per cent of people suffering severe gambling harm seek help: Victorian Responsible Gambling Foundation (2023, p. 26), Office of Liquor and Gaming Regulation (2024, p. 70) and M. Browne et al (2020, p. 72).
143. Murphy et al (2023, p. 49); and Wesley Mission (2024a).
144. Murphy et al (2023, p. 51).

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145. Grant and Chamberlain (2020); and Manning et al (2017).
146. Reid et al (2024); Manning et al (2020); and Rodda et al (2018).
147. e.g. ‘Overall, the department does not know whether its existing strategies have been effective in reducing gambling-related harm in Queensland. While it knows its programs help some individuals, it needs an overall assessment of the effectiveness of its services’: Queensland Audit Office (2024, p. 2).
148. Murphy et al (2023, pp. 55–56).
149. ‘Funded service providers advised the Committee that they do not know if the treatment they are delivering works’: Victorian Public Accounts and Estimates Committee (2023, p. 120).

2.2.1 Gambling taxes are an important source of revenue

State governments deregulated gambling in the 1990s, in part to open up a new revenue stream.¹⁵⁰ Gambling taxes today remain an important source of revenue for state and territory governments. In total, state and territory governments collected about \$9 billion in gambling taxes in 2022-23 – about 8 per cent of their total tax revenue.¹⁵¹

In most states and territories, except the Northern Territory, gambling’s share of tax revenue has declined over the past two decades. But gambling is still the fifth-largest tax base for states and territories overall, after payroll, stamp duty, property, and motor vehicle taxes (Figure 2.1).¹⁵²

Tax collected varies widely across different forms of gambling. Governments collect an average of just 11 cents for every \$1 spent on betting,¹⁵³ but 67 cents for every \$1 spent on lotteries, and 31 cents for every \$1 spent on pokies.¹⁵⁴

Gambling taxes return some of the industry’s excess profits to the public.¹⁵⁵ Taxes may also discourage some gambling activity, by making

Figure 2.1: Gambling is a small but important source of revenue for most states and territories

Tax revenue by category, share of state's total tax revenue, 2022-23



Notes: Stamp duties on conveyances – one of the largest revenue sources for states – are separated out, though they are officially classified as a subset of financial and capital transaction taxes. Municipal rates are excluded.

Source: ABS (2024b).

150. Smith (1998); and Productivity Commission (1999).

151. ABS (2024b). The total includes all tax revenue collected by state and territory governments, and excludes municipal rates, taxes received from public corporations, and Commonwealth grants.

152. ABS (ibid). Excludes GST revenue and municipal rates.

153. Covers online and offline betting. Several jurisdictions have, or are considering, increasing tax rates on betting: Victoria increased the tax on online betting spending from 10% to 15% on 1 July 2024: Andrews (2023b).

154. Queensland Government Statistician’s Office (2023).

155. The industry’s excess profits – that is, profits earned above the normal rate of cost recovery and return – are a result of government regulation, which creates gambling monopolies and other favourable operating conditions: Henry et al (2009, p. 458).

the odds even less favourable to gamblers.¹⁵⁶ And of course, state governments use the revenue raised to pay for other services.

But state governments – and the community – also bear significant social costs associated with gambling.¹⁵⁷ Tax considerations should not be a major barrier to reform.

2.2.2 ... but political risk is the biggest barrier to reform

Gambling is one of Australia's most politically powerful industries, which makes gambling reform high risk politically. This is the main reason current regulation is so weak.

Past reform pushes have failed because of well-funded, coordinated attacks by vested interests. The most visible example of this was the Gillard government's backflip on pokies reform (see Box 2). More than a decade later, there is still the lingering threat that the pokies industry could do it again: a former NSW gambling minister, when considering pokies reforms, said he was told 'we will do to you what we did to Julia Gillard'.¹⁵⁸

The gambling industry's political power lies in its ability to influence elections. They can make their presence known locally, with pokies providers in almost every electorate, stoke community fears about loss of jobs and services (Chapter 4), and they exert financial influence too.

For example, political donations from gambling businesses were instrumental in Tasmania's 2018 election, where the future of pokies

156. Additional taxes impose extra costs on gambling providers, which they could partly recover by reducing the return to gamblers. For example, a pokies operator might change the average return rate of a machine from 90 cents in the dollar to 85 cents in the dollar (which is the legislated minimum return rate in most states: Livingstone (2017) and Woolley et al (2013)).

157. M. Browne et al (2017).

158. Nicholls et al (2023).

Box 2: Gillard's pokies backflip

After the 2010 federal election, Independent MP Andrew Wilkie struck a deal with Julia Gillard to support her minority government in exchange for the rollout of a mandatory pre-commitment scheme for pokies (as recommended at the time by the Productivity Commission).^a

Despite pokies reforms being popular with voters, an organised effort from pokies businesses, led by Clubs Australia, ultimately led to the Gillard government walking away from its agreement with Wilkie in early 2012.^b

Clubs, hotels, and other businesses that financially benefit from pokies fought the reforms, exaggerated the impacts, and ramped up their political donations over the period (see Figure 2.3). They also ran a very effective advertising campaign.^c

The main Clubs Australia campaign, called 'Won't Work, Will Hurt', included mail to residents in marginal Labor electorates in NSW and Queensland, community rallies across NSW, large billboards naming local members with the slogan 'Why don't you stand up for our community?', and drink coasters and T-shirts for club staff with the slogan 'Who voted to put me out of work?'^d

The clubs reportedly had a war chest of \$40 million for the campaign, but only needed \$3.5 million to get the result they were looking for.^e

a. Productivity Commission (2010).

b. Wood et al (2018, pp. 73–74); and Lewis (2023).

c. Panichi (2013).

d. Lewis (2023).

e. Ibid.

in pubs and clubs was a key issue.¹⁵⁹ When the Tasmanian Labor Party proposed removing pokies from pubs and clubs, the gambling industry swung behind the other side. The Tasmanian Liberal Party won the election, with nearly 90 per cent of the party's declared donations coming from gambling interests (a 10-fold increase on the amount gambling groups had given in the previous election).¹⁶⁰ The hotels lobby also ran an intensive advertising campaign during the election.¹⁶¹

This recent history makes Tasmania's current pokies reforms all the more remarkable (see Box 6 in Chapter 3).

Gambling donations flow overwhelmingly to the major parties, who are most likely to form government.¹⁶² Clubs and hotels with pokies interests are the biggest gambling donors, followed by casinos (Figure 2.2). And gambling donations show a pattern of spiking when the 'political heat' rises, on pokies reform in particular (Figure 2.3 and Box 2).

The biggest spike was in 2018-19 (Figure 2.3), when the pokies industry made big donations in the lead up to the Victorian election in November 2018, mostly backing Labor.¹⁶³ The Australian Hotels Association (representing pubs and hotels with pokies across Victoria) was reportedly trying to prevent The Greens from winning the balance of power in the state election, because of The Greens' strong

anti-pokies policies.¹⁶⁴ The industry funded its donations through a levy on pub pokies.¹⁶⁵ Labor ultimately won the election.¹⁶⁶

NSW stands out in having banned political donations from gambling businesses because of the potential for influence and perception of influence.¹⁶⁷ But gambling interests in NSW still can and do donate at the federal level.

In 2018, Grattan Institute published a report on vested interest influence in Australian politics. It found that highly regulated industries, including gambling, lobby far more than other businesses, unions, charities, and consumer groups. And the gambling industry particularly stood out, as an industry gaining far more access and influence than you might expect given its relatively small contribution to the economy.¹⁶⁸

It is no surprise that the gambling industry knocks on politicians' doors: government decisions can make a big difference to the industry's bottom line.¹⁶⁹ The worry is that politicians are not getting a balanced view of the issues when they spend so much time talking to the industry and rely on political donations from the industry.¹⁷⁰

159. Wood et al (2019).

160. Ibid.

161. Morton (2018).

162. Less than 1 per cent of all gambling donations and other receipts since records began in 1998-99 have gone to a party other than Labor or the Coalition: Grattan Institute analysis of annual political party returns to AEC (2024).

163. More than half of all donations from the gambling industry in 2018-19 went to Victorian branches of the major parties (55%, \$1.3m) – mostly backing Labor (\$777k, of which \$761k was donated by the Hotels Association). This was also a federal election year in which Labor was expected to win but didn't (May 2019).

164. Millar et al (2019).

165. Ibid.

166. Labor did not achieve a majority in the upper house, but The Greens alone did not hold the balance of power.

167. Muller (2022). NSW introduced a ban on political donations from gambling businesses in 2011, but it did not include not-for-profit clubs that house pokies. In 2023 the ban was extended to include all registered clubs that host gambling.

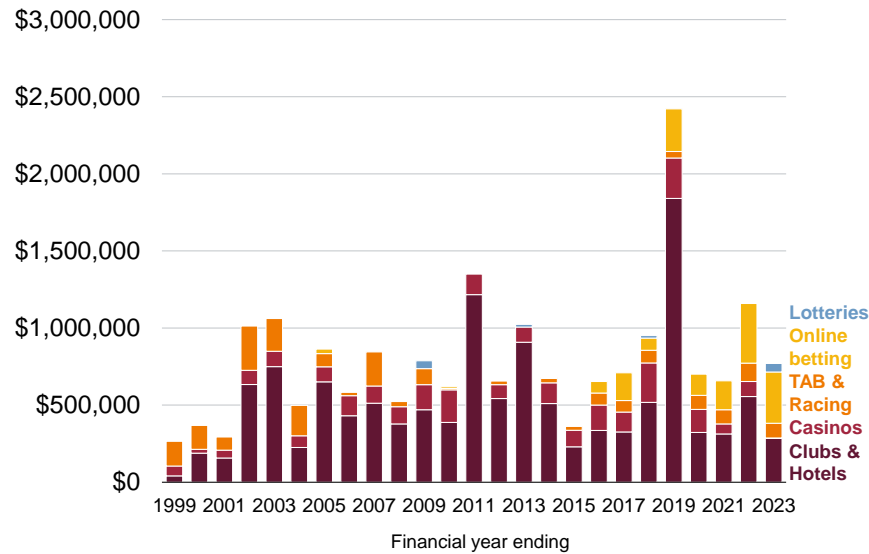
168. Wood et al (2018, Figure 2.4).

169. The industry can only operate when and where governments allow, and its high profits are often protected by monopoly licences.

170. Wood et al (2018).

Figure 2.2: Political donations from the gambling industry are largely from pokies interests (clubs and hotels)

Political donations and other receipts from gambling interests, nominal



Notes: NSW has had a ban on donations from gambling businesses since 2011. That ban was extended in 2023 to not-for-profit clubs that host gambling.

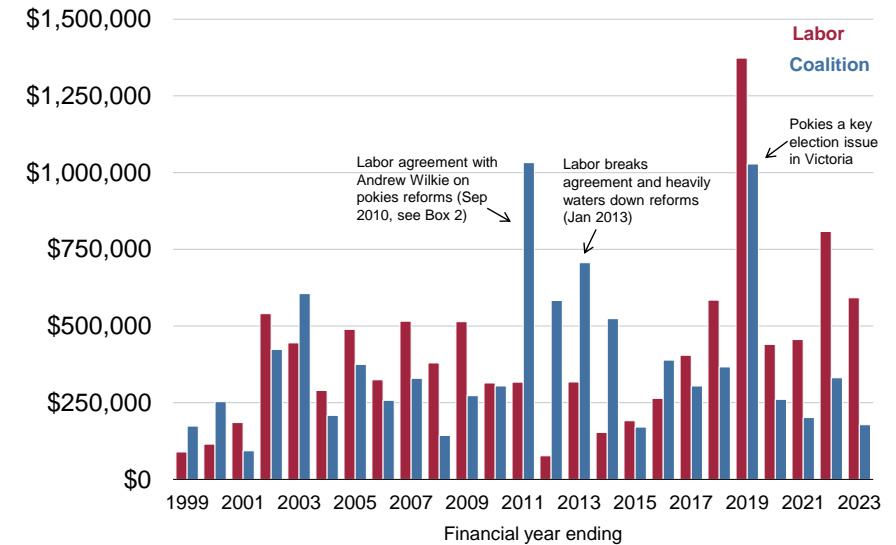
Source: Grattan Institute analysis of annual political party returns to AEC (2024).

Australia’s most powerful gambling lobbyists include pokies operators and manufacturers (ClubsNSW, the Australian Hotels Association, and Aristocrat Leisure), betting companies (Responsible Wagering Australia,¹⁷¹ and Tabcorp), and the main casino operators (Star Entertainment Group, Crown Resorts, and Federal Group in Tasmania).

171. Which represents several major online betting providers: Belot (2024).

Figure 2.3: Gambling donations spike with pokies reform attempts

Political donations and other receipts from gambling interests, nominal



Notes: The Australian Hotels Association gave more than \$1.1 million to Victorian branches of the major parties in 2018-19, mostly backing Labor (\$761k), reportedly to try to deny The Greens the balance of power given their anti-pokies policies. NSW has had a ban on donations from gambling businesses since 2011. That ban was extended in 2023 to not-for-profit clubs that host gambling.

Source: Grattan Institute analysis of annual political party returns to AEC (ibid).

Gambling companies and peak bodies apply political pressure through every avenue to protect their interests. This includes hiring commercial lobbyists,¹⁷² meeting directly with key ministers,¹⁷³ hosting functions for

172. Grattan Institute analysis of Attorney-General’s Department (2024).

173. For example, the gambling industry landed 48 meetings with key ministers in NSW in 2023: Grattan Institute analysis of NSW Government (2024).

policy makers and powerbrokers,¹⁷⁴ public advertising campaigns,¹⁷⁵ targeted seat campaigns,¹⁷⁶ recruiting powerful allies,¹⁷⁷ and making political donations.¹⁷⁸

ClubsNSW is so powerful it has managed to get three NSW governments to sign pre-election memorandums of understanding (MoUs), committing that, if elected, the government would not implement policies that threaten clubs' gambling revenue.¹⁷⁹

Federal rules around lobbying and political donations are weak,¹⁸⁰ enabling those with motivation and resources to have more say – and sway – over public policy than they should.

174. Ting (2021).

175. For example, in the lead up to the 2023 NSW election, ClubsNSW ran a misleading scare campaign titled 'Gaming Reform The Right Way', claiming cashless pokies would 'empower government bureaucrats to monitor your spending': Herald (2023).

176. For example, NSW Independent MP Helen Dalton, an outspoken critic of pokies, was targeted by ClubsNSW at the recent state election: Jones (2022). The campaign failed and Dalton was re-elected: Green (2023). ClubsNSW also targeted Victor Dominello when he was the NSW minister responsible for gambling policy, after he floated the idea of mandatory pre-commitment for pokies. Dominello believes the industry's influence ultimately got him sacked from that portfolio: Nicholls et al (2023).

177. See Box 3. Powerful allies also include a 'revolving door' of influential people: Mizen (2024b) and Lewis (2023).

178. Ting et al (2021); and Ting et al (2022).

179. Lewis (2023), Foote (2022), O'Farrell et al (2010), Baird et al (2014) and Berejiklian et al (2018). To their credit, neither major party signed such an MoU in the lead up to the most recent NSW election: Mayne (2023).

180. Wood et al (2018).

Box 3: The gambling industry has powerful allies

The gambling industry rarely stands alone in resisting gambling reform efforts. Gambling is intertwined with our local pubs and clubs, with our major sporting codes, and with Australia's major television networks.

When pokies reforms are on the table, local clubs are the sympathetic face of industry obstruction. And Australia's favourite sports, and free-to-air TV channels, have led the resistance to a gambling advertising ban.^a

The industry has forged these alliances, striking revenue-sharing deals with the major football leagues,^b and embedding itself to the point that clubs and TV networks think they need the gambling dollars.

While these arguments are mostly hot air (as Chapter 4 shows), they successfully create fear, helping to make the gambling industry 'untouchable'.

a. Seccombe (2024); and Keane (2024).

b. McClure (2022); and McGrath et al (2023).

3 A roadmap to prevent gambling harm

If Australian governments are serious about preventing gambling harm, they will need to bolster their efforts and take action to both reduce the pervasiveness of gambling in Australia and make gambling safer.

Gambling normalisation starts young, and sports betting advertising is a major culprit. The federal government should ban all gambling advertising, sponsorships, and inducements.

For those who choose to gamble, mandatory pre-commitment with maximum loss limits would ensure they no longer lose more than they can afford. The federal government should establish a national pre-commitment system for online gambling, and state governments should roll out state-wide pre-commitment for pokies. In parallel, the federal government should investigate the feasibility of a universal system across all gambling environments.

These recommendations would make gambling much safer, but they will take several years to implement. In the meantime, governments should improve support services to help those suffering harm now.

3.1 Reduce exposure to gambling

The pervasiveness of gambling in Australian society normalises it for young people and makes it harder for people suffering gambling harm to break the cycle.¹⁸¹ Three-quarters of Australians believe gambling is too prevalent, and two-thirds think it is ‘dangerous for family life’.¹⁸²

181. Murphy et al (2023); and see Chapter 1.

182. Jenkinson et al (2023a).

Australians are mainly exposed to gambling through advertising,¹⁸³ at local pubs and clubs that host pokies and betting facilities,¹⁸⁴ and through video games.¹⁸⁵

3.1.1 Ban gambling advertising and inducements

Gambling advertising exposes large numbers of Australians, including children, to a dangerous product,¹⁸⁶ and increases losses, with little corresponding economic or social benefit.¹⁸⁷ Yet gambling ads are everywhere, implicitly sanctioned by our weak regulations.

A full ban is important. Partial advertising bans, by definition, leave gaps, and advertisers will capitalise on these gaps. Gambling advertising on TV actually increased after restrictions on gambling ads during live sport were introduced in 2018 (Figure 3.1). Similarly, in the 1970s, a ban on tobacco advertising on radio and TV just pushed ads into print media, billboards, and sponsorships instead.¹⁸⁸

183. See Section 1.2.1 on page 7 on the torrent of gambling advertising in Australia.

184. See Section 1.2.1 on page 7 on the pervasiveness of pokies.

185. In 2016, about 20 per cent of adolescents reported playing gambling-like electronic games at least once a year: Sakata and Jenkinson (2022). Gambling-like features (specifically loot boxes) were found in 58 per cent of the top games in the Google Play Store, in 59 per cent of the top games in the Apple Store, and in 36 per cent of the top games in the Steam store: Murphy et al (2023, pp. 130–131).

186. As Murphy et al (ibid, p. iv) put it: ‘Gambling advertising is grooming children and young people to gamble and encourages riskier behaviour.’

187. The potential benefits of gambling advertising are informing customers of new services, promoting competition, and creating incentives for brands to maintain good reputations: Productivity Commission (2010). But these potential benefits are not particularly compelling when stacked against the costs.

188. Murphy et al (2023, pp. 116, 126) and Winstanley et al (1995). Then when print media ads and sponsorships were banned, the tobacco companies shifted their

Even if a partial ban resulted in fewer gambling ads on TV, it would still allow widespread exposure to gambling advertising (including for children). It may also encourage advertisers to more aggressively market their products in other ways, such as through direct marketing and inducements, which are known to be high risk for people suffering gambling harm, and encourage children to perceive gambling as lower risk than it is.¹⁸⁹

The federal government should ban all gambling advertising and inducements, as recommended by the multi-partisan Murphy Inquiry last year.¹⁹⁰ The Murphy Inquiry called for a comprehensive ban on ‘all gambling advertising on all media’ (broadcast and online) to be phased in over three years, and a ban on inducements ‘without delay’.

A phased approach would give sporting bodies and broadcasters time to find replacement revenue.¹⁹¹ Despite alarmist claims, this would not be a fatal blow to either (Chapter 4).

3.1.2 Rein in the pokies over time

Pokies are far too widespread and accessible, particularly in NSW, Queensland, and the NT (see Figure 1.3). Western Australia’s ‘destination model’, where gaming machines are only available at Perth Casino, appears to have paid off in lower rates of gambling harm.¹⁹²

Limiting the sheer number of venues where pokies are present is more important than simply limiting the number of machines. While a

marketing budgets to retail venues and events – including hiring ‘cigarette girls’ to roam dance floors looking for customers: Harper (2001) and Carter (2003).

189. M. Browne et al (2019); Nyemcsok et al (2018); and Balem et al (2022).

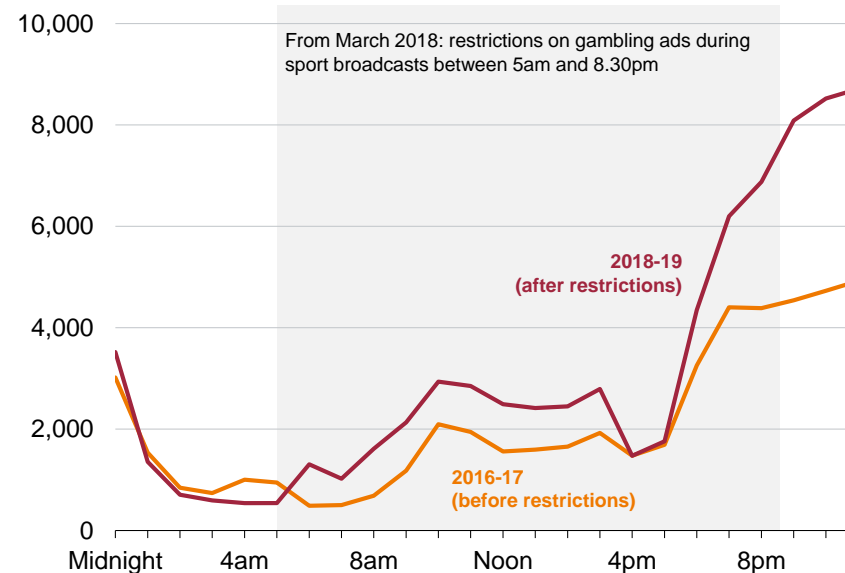
190. The Government’s Rapid Review Expert Panel for the prevention of domestic, family, and sexual violence also supported a full ban on gambling advertising: Campbell et al (2024).

191. Murphy et al (2023, pp. iv–v).

192. Russell et al (2023).

Figure 3.1: Gambling ads increased after a partial ban in 2018

Number of gambling ads on TV between April and June, by time of broadcast



Notes: Combined number of ads across metro and regional TV markets. ‘Before’ is the average figures for April to June in 2016 and 2017. ‘After’ is the average figures for April to June in 2018 and 2019. Restrictions on gambling ads during sport came into effect on 30 March 2018. The restrictions apply between 5am and 8.30pm, and ban gambling advertising during play, within breaks in play, and five minutes either side of live sport broadcasts.

Source: ACMA (2019).

destination model such as Western Australia's is a long way off for the rest of the country,¹⁹³ state governments should actively reduce the number of machines and venues.

State governments set caps on the number of pokies, so this is a tool they can use to lower numbers over time. Other policies, such as NSW's 2-for-1 trading arrangements (where for every two pokies licences traded, one must be forfeited) can support the goal of reducing pokies numbers over time.¹⁹⁴

The biggest gains come from substantial cuts that reduce the number of venues with pokies.¹⁹⁵ But achieving a big reduction in pokies numbers quickly would probably require massive buyback schemes, costing hundreds of millions of dollars, if not more.¹⁹⁶ Buyback schemes would be better used to support the rollout of mandatory pre-commitment (see Section 3.2) rather than as a stand-alone policy.¹⁹⁷

The proliferation of pokies is a problem that state governments should chip away at over time, at the very least to avoid making things worse.

193. Quickly shifting to a destination model would be costly and difficult: Productivity Commission (2010).

194. Harris (2023). In New Zealand, local governments that restricted pokies licence trading reduced pokies numbers and spending compared with areas without such a scheme: Erwin et al (2022).

195. Productivity Commission (2010); and Marionneau et al (2022).

196. For example, buying back half the pokies licences in NSW at the current ACT buyback price of \$15,000 per authorisation would cost the state about \$700 million. And halving numbers in NSW would still only bring the state in line with the second highest state, Queensland.

197. In general, a well-designed pre-commitment scheme is likely to be more effective at preventing harm than efforts to reduce the accessibility of pokies taken alone: Productivity Commission (2010).

3.1.3 Warn people about gambling in games

Many video games include gambling-like features that familiarise children with gambling and can be a gateway to other gambling. Loot boxes, in particular, are a common gambling-like feature in electronic games and have been linked to gambling problems (see Box 4).

Most Australian teenagers play video games, and more than 20 per cent of adolescents in NSW reported purchasing loot boxes in the past 12 months.¹⁹⁸

Australia's game classification system was recently amended to require games to be rated M+ if they include 'in-game purchases linked to elements of chance' (such as loot boxes), and rated R if they involve 'simulated gambling' (such as social casinos).¹⁹⁹ This leaves loot boxes still available to minors.²⁰⁰

Australia should introduce a gambling warning label,²⁰¹ so that people know when a game contains gambling-like features. This would help gamers of all ages avoid exposure to gambling if they wish, and it may be particularly helpful for parents to reduce their children's incidental exposure to gambling.

198. Greer et al (2022).

199. *Guidelines for the Classification of Computer Games 2023* (Cth) 2023.

200. Independent federal MP Andrew Wilkie tabled a Bill in 2022 to rate games with loot boxes R, but it ultimately did not proceed: Wilkie (2022).

201. The Murphy Inquiry recommended 'research into an effective simulated gambling warning label' to be incorporated into the National Classification Scheme. The inquiry also recommended investigating further consumer protections, such as default spending controls, or disabling loot box features as a default: Murphy et al (2023, p. 148).

3.2 Roll out mandatory pre-commitment with maximum loss limits

Even with reduced exposure to gambling, many Australians would still choose to gamble. The most effective way to make gambling safer (and ultimately more enjoyable) is to introduce mandatory pre-commitment with maximum loss limits for people using pokies or gambling online.²⁰²

Under our proposed mandatory pre-commitment system (Box 5), a gambler would choose their limits in advance – before they lose track of time, start chasing losses, or are otherwise compromised in their decision making (see Chapter 1). The system would then enforce these limits.

The scheme should have regulated upper limits,²⁰³ to prevent catastrophic losses, particularly given the evidence that many people, when asked to set limits in advance, will choose an unrealistically high level,²⁰⁴ such as \$1 million a day.²⁰⁵

The system needs to be mandatory to be effective, but should have very little impact on people who gamble in moderation (Box 5). The system is there to prevent catastrophic losses for people whose decision making is impaired by addiction, alcohol, or anything else. It's a seatbelt for gambling: it should hardly be felt when everything is going smoothly, but prevent serious harm when something goes wrong.

202. Thomas et al (2016) and Productivity Commission (2010).

203. In a review of pre-commitment features, Thomas et al (2016) found that daily monetary limits assist all gamblers to control impulsive over-spending, and that additional longer-term monetary limits (e.g. weekly or monthly) are important for higher-risk and frequent gamblers.

204. Thomas et al (2016) and Financial Counselling Australia (2023).

205. An evaluation of Victoria's voluntary pre-commitment system YourPlay found 'daily spending limits of more than \$1 million are common': The South Australian Centre for Economic Studies (2019).

Box 4: A loot box

Loot boxes are virtual containers that can be purchased or won in video games. When opened, players receive surprise items, such as weapons, special abilities, and skins (cosmetic items). These items can enhance player performance or have aesthetic and social value due to their rarity.

Gambling and purchasing loot boxes are very similar. They both involve spending money for uncertain reward, encouraging you to continue purchasing until you obtain the desired item or win money.

People who purchase loot boxes are more likely to gamble, and suffer gambling harm, in future.^a For example, Australian adolescents who purchased loot boxes were three times more likely to engage in high-risk gambling than other adolescents.^b

Young people are especially vulnerable because high impulsivity is common in adolescence,^c and is linked to high-risk gambling.^d

There is not enough evidence to establish whether loot boxes lead people to other forms of gambling, or whether people who are drawn to gambling are also attracted to loot boxes.^e But either way, there are good reasons to regulate loot boxes: to reduce exposure to gambling, or to reduce harm in another gambling mode for people at risk, including young people.

a. Brooks and Clark (2023); Montiel et al (2022); and Garea et al (2021).

b. Hing et al (2022).

c. Carvalho et al (2023).

d. Secades-Villa et al (2016).

e. For example, in one survey, some people reported that they thought purchasing loot boxes caused them to gamble down the track, while others reported that they thought gambling caused them to purchase loot boxes later: Zendle and Cairns (2019) and Spicer et al (2022).

Box 5: Mandatory pre-commitment with maximum loss limits: our proposed scheme

This report recommends a national scheme for online gambling and state-based schemes for pokies, with the following features:

- **Choose your limits before you gamble:** Mandatory pre-commitment means everyone needs to choose how much they are willing to lose before they start gambling.
- **Maximum loss limits:** There should be a regulated upper limit on losses, for example \$100 a day, \$500 a month, and \$5000 a year.^a
- **Lowering limits:** Anyone should be able to lower their personal limits at any time.
- **Raising limits:** A time delay of at least 24 hours should apply to raising your personal limits, up to the maximum limits. There should be a process available to apply for higher limits (beyond the default maximum) if gamblers can demonstrate capacity to sustain higher losses.^b
- **Self-exclusion:** Limits can be set to zero to self-exclude. Pre-commitment schemes could also link to state and national self-exclusion registers.
- **Mandatory matters:** Mandatory schemes – where limit setting is required of all players – are much more effective in preventing harm than voluntary schemes – where customers can opt in and out (including after hitting their chosen limit).^c Many studies have found voluntary schemes to be ineffective in limiting losses,^d largely because people opt out even when prompted.^e
- **Minor inconvenience:** The downside of a mandatory scheme is that it applies to many people who won't 'need' it. But it is not a major imposition. Pre-commitment doesn't require much more time or effort than identity verification (which is already required for online betting). Most people spend very little so would be unlikely to ever hit the maximum limits anyway.^f
- **Privacy protections:** A mandatory scheme needs strong privacy safeguards. Individual records can and should only be used to inform people of their own spending and help them stick to the limits they choose. Identifiable data should not be available to the gambling industry, credit agencies, bureaucrats, or anyone else for other purposes.^g

a. These are the limits set for Tasmania's pokies pre-commitment scheme: See Box 6 on page 34.

b. As recommended by the Tasmanian Liquor and Gaming Commission in 2022.

c. Productivity Commission (2010); Thomas et al (2016); Delfabbro and King (2021); and Ladouceur et al (2012).

d. Wohl et al (2024); Delfabbro and King (2021); and Ladouceur et al (2012).

e. Delfabbro and King (2021).

f. See Section 4.2.3 on page 45.

g. In accordance with the *Privacy Act 1998* (Cth). However, deidentified, aggregated data could be safely used for research to inform better harm prevention (Section 3.2.2) – just as an individual's Census form is never published, but average statistics on their state are.

Regulators should be wary that setting limits on how much people can lose while gambling creates an incentive for the industry to more aggressively try to increase its customer base. This makes the ban on all gambling advertising and inducements (Section 3.1.1) all the more important.

3.2.1 Mandate pre-commitment with maximum loss limits for online gambling and pokies

The federal government should establish a national mandatory pre-commitment system for online gambling, and state governments should implement state-wide mandatory pre-commitment schemes for pokies. This will go a long way to preventing harm from the two most risky and widespread forms of gambling.

Mandate pre-commitment with maximum loss limits for online gambling

The federal government should establish a national mandatory pre-commitment system across all online gambling – including online betting, phone gambling services, online lotteries, and online Keno – with maximum loss limits.

The system could be run through the federal government’s BetStop system (the national self-exclusion register), or could draw on that model.²⁰⁶ Under the BetStop system, all online and phone gambling providers licensed in Australia must verify customers’ identities, and check that they are not on the self-exclusion register, before they can place a bet.²⁰⁷

206. Rintoul (2023). See Box 1 on page 20.

207. Rowland and Rishworth (2023). BetStop does not currently include online lotteries and online Keno, so should be extended to cover these forms of gambling too.

This system could be extended to support mandatory pre-commitment for all customers.²⁰⁸ Providers would need to verify customers’ chosen limits – in the same way they currently verify customer identity – and not allow losses beyond those limits. Providers should also give warning messages to customers as their limit approaches, so it doesn’t come as a shock.

When setting limits, customers could be offered a set of default limits and the opportunity to lower those limits, or raise them up to the regulated maximum limits. They should only be allowed to set limits above the maximum if they can demonstrate the financial capacity to sustain those losses.²⁰⁹

Once a national pre-commitment system for online gambling is well established, it may be possible to extend the system to cover other forms of gambling too (Section 3.2.2).

Mandate pre-commitment with maximum loss limits for pokies

Mandatory pre-commitment for pokies should be a priority given that pokies are a particularly harmful form of gambling (see Chapter 1). Pokies are designed to make you lose track of time and money. Pre-commitment with maximum loss limits would prevent things getting out of hand.

Tasmania is currently implementing a state-wide mandatory pre-commitment scheme for pokies, with maximum limits, that should

208. BetStop is expected to cost about \$48 million to build and operate through to 2027, with the cost covered by industry. The Australian Communications and Media Authority (ACMA) has not assessed the cost of extending the system.

209. This will be a feature of the new Tasmanian pokies reforms (Box 6), as recommended by the Tasmanian Liquor and Gaming Commission in 2022, but the process for raising limits is still being determined. In Belgium, credit checks are conducted before approving higher limits (see Appendix A).

guide other states (Box 6). State-wide schemes should apply to all venues with pokies licences, including casinos.²¹⁰

Pokies venues would need to ensure that people can only gamble on pokies using their registered card, as per the Tasmanian model. Compliance with the mandatory scheme should be a condition of holding a licence.

Cashless gaming is currently a major focus for NSW, and is an important part of tackling money laundering via pokies,²¹¹ but is not an essential pre-cursor for mandatory pre-commitment.

Most pokies already have card readers (for example, for reading loyalty cards), and are connected to a central monitoring system for tax purposes, but machines that don't would need to be modified²¹² to continue operating.²¹³ People could still pay with cash, as long as the machine only operates when linked to a valid card.²¹⁴

State governments should mandate venue compliance with the scheme and could offer to buy back machines that do not comply.²¹⁵ Pokies venues would then have the option of retrofitting or upgrading their machines to comply, or if they prefer, they could sell their licences for non-compliant machines back to the state government.

210. Most of Australia's casinos host pokies. The only exceptions are Casino Canberra and Crown Casino Sydney.

211. NSW Crime Commission (2022).

212. Pre-commitment requires a card reader and a centrally registered identity. This could be added to the existing central monitoring system that pokies have for tax purposes, which already collects data on machine use.

213. Machines usually only function for three-to-four years anyway, so replacement is common: Business Queensland (2024).

214. Any use of cash would therefore count towards the card's limit.

215. Whether buybacks are necessary will depend on state licensing arrangements. Many licences are granted for 10 years or more. In NSW, licences are granted in perpetuity.

Box 6: Tasmania's pokies reforms are the best Australian model

Tasmania is implementing a mandatory card system for pokies, covering every venue in the state (hotels, clubs, and casinos). The scheme is expected to be up and running by late 2025.^a

People will need to show ID to register for a card, with a Monitoring Operator in charge of verifying that each person only registers once.

The card will be pre-set with default limits of \$100 per day, \$500 per month, and \$5,000 per year. People can choose to reduce their limits, at any time, with immediate effect.^b Anyone who wishes to increase their limit above the default limits will need to show proof that they are able to sustain higher losses.^c Gamblers will get warning messages as they approach their limit, and if they reach their limit, play will cease and the card will be inoperable until the limit refreshes.^d

In 2022, the Tasmanian Gambling Commission estimated this state-wide system would cost about \$10 million to develop and implement in all licensed venues.^e Tasmanian pokies are largely coin-based, so machines will be fitted with card-readers and linked to a revamped central monitoring system that will enforce pre-commitment and limits. The final cost of implementing and monitoring the system won't be clear until the scheme is up and running. Who foots the bill (industry, taxpayers, or some combination) is also still to be determined.

a. Holmes (2024).

b. Card holders can also increase their limit back up to the default limits, but with a time delay that is still to be determined.

c. This process is still to be determined.

d. Tasmanian Liquor and Gaming Commission (2022).

e. Ibid.

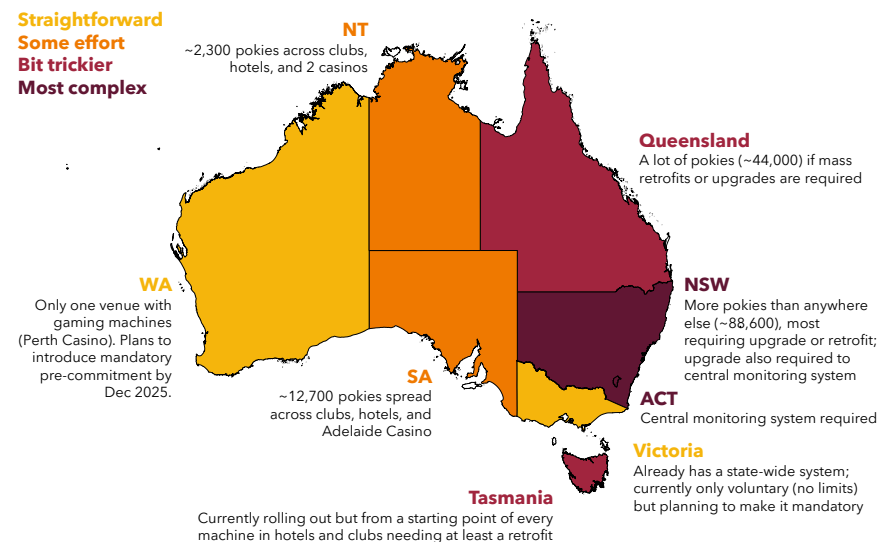
Offering a buyback option should reduce pokies numbers while giving the industry some choice in how they manage the impact of the mandatory scheme on their business. Buyback costs could be substantial if lots of machines are non-compliant and venues opt to surrender their licences. While this is unlikely – given how profitable pokies are²¹⁶ – a substantial reduction in pokies numbers would come with great social benefits in reducing exposure to gambling,²¹⁷ so governments should not shy away from the risk of a higher (one-off) cost.

The ACT is currently running a small buyback scheme, offering \$15,000 per gaming machine authorisation surrendered and \$20,000 per authorisation if a venue goes ‘pokie-free’.²¹⁸ The extra incentive to go ‘pokie-free’ supports the goal of reducing exposure to gambling.

State governments should focus their effort on rolling out state-wide mandatory pre-commitment, with the buyback option as a supporting policy only. The buyback option should therefore be primarily for non-compliant machines, but could be extended to all machines in a venue if the venue goes ‘pokie-free’.²¹⁹

There are different implementation considerations in each state (see Figure 3.2). Some states, such as Victoria, already have the necessary

Figure 3.2: Different states have different starting points for rolling out pokies pre-commitment



Note: Numbers are gaming machines in operation as at 30 June 2021.

Sources: Queensland Government Statistician’s Office (2023) and expert consultation.

216. The average loss per gaming machine in Australia was \$65,758 in 2020-21, and higher in NSW at \$73,835: Grattan Institute analysis of Queensland Government Statistician’s Office (2023).

217. For example, during the COVID lockdowns, pokies and casinos were unavailable and while some research showed an uptick in online gambling during this time, it did not replace pokies losses: Gainsbury et al (2021) and Brodeur et al (2021). Substantial reductions in pokies numbers can make a big difference, but small reductions are unlikely to do much because other machines can be ‘worked harder’ to compensate: Livingstone (2024).

218. Rattenbury (2024).

219. Reducing the number of pokies in a venue can reduce losses marginally, but the biggest gains come when there are fewer venues with any pokies, and the harmfulness of all pokies is reduced: Marionneau et al (2022).

functionality across all their machines, so can implement mandatory pre-commitment more easily.²²⁰ In contrast, the ACT lacks a central monitoring system for its pokies, adding an extra implementation hurdle.²²¹

Some states just have a lot more pokies than others. NSW has a particularly big job, with a lot more gaming machines than any other state (see Figure 3.3), and the majority requiring an upgrade or retrofit to enable limit setting. More importantly, the central monitoring system in NSW is only one-way (rather than two-way, as it is in other states), and a two-way system is needed for state-wide pre-commitment. While many of the implementation challenges are greater for NSW, so are the benefits.

3.2.2 Investigate the feasibility of a single universal pre-commitment system for gambling

In parallel to the reforms above, the federal government should investigate the feasibility of a single system for mandatory pre-commitment across all gambling environments. Rather than setting separate limits for pokies, online betting, and other forms of gambling, the ideal would be a single limit across all forms of gambling.

This is a relatively novel concept, but there are some international examples that show it can be done (see Appendix A).

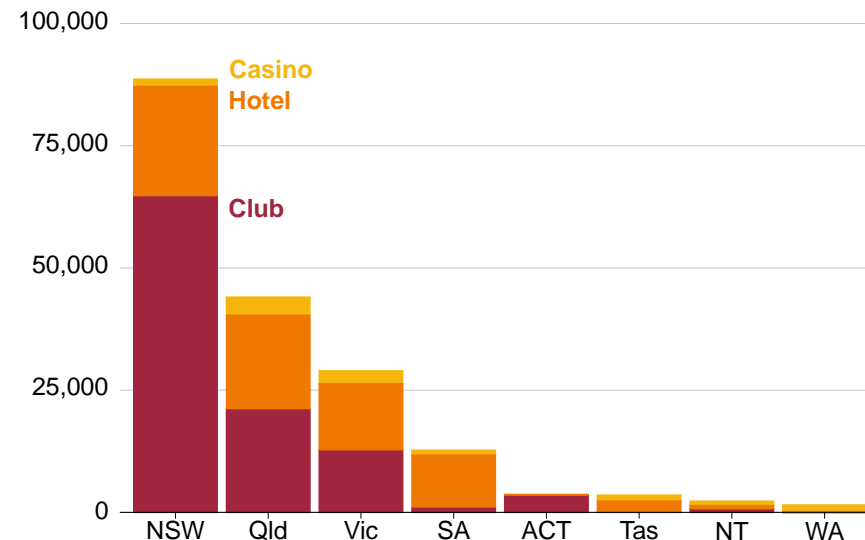
A universal system may need to be administered by a national agency (as it is in Germany and Norway) to keep track of people's nominated limits and spending across providers.

The feasibility study should:

220. Ilanbey (2023); and Livingstone (2023b).

221. The ACT could consider introducing a central monitoring system as part of rolling out its scheme, or could work with NSW on a joint scheme: Fenwicke (2024).

Figure 3.3: NSW stands out for sheer number of pokies
Pokies operating as at 30 June 2021



Source: Queensland Government Statistician's Office (2023).

- Examine international models, consider bespoke options, and make a recommendation if there is a workable model for the Australian context (or a series of costed options);
- Consider whether a national gambling regulator would be required to administer and enforce the system, or whether there are existing institutions that could take on this role; and
- Identify the measures required to protect people's privacy.

If feasible, a universal pre-commitment system could give gamblers better information about their own spending patterns and regulators better information on broader patterns of gambling and gambling harm – data that currently only the industry itself holds. The online and pokies pre-commitment schemes recommended in Section 3.2.1 also offer this side benefit. This data can and should be deidentified to protect people's privacy.

3.3 Improve gambling support services

Australia needs more accessible and effective support services for people suffering gambling harm. While some people might just want information on self-management tools or peer supports, others may need one-off or ongoing counselling, financial counselling, or more intensive psychological support.

Gambling treatment and support services should be a responsibility of health ministers, not industry ministers.²²² Recognising gambling harm as a health issue should improve models of care and reduce barriers to integrating gambling treatment with other health services.²²³

222. This has already happened in Victoria, as was recommended by the Victorian Public Accounts and Estimates Committee (2023); Kolovos (2024).

223. Lubman (2023, p. 10).

Australia needs a stronger evidence base on the most effective supports for people suffering gambling harm. Federal and state health ministers – through the national Health Ministers' Meeting Forum – should commission a review of gambling support services to:

- Identify the most effective, and cost-effective, models of care.
- Map the availability of current services and identify gaps:
 - Are the right services available when and where people need them? Are more resources needed to meet demand?
 - To what extent are integrated treatment options available to people with co-occurring mental illness, substance use, or other addictions?²²⁴
- Develop strategies for screening and referral:
 - What is the best approach to screening and referral for gambling problems across frontline health and financial services?²²⁵
 - Is there scope to screen for emerging gambling problems via patterns of gambling activity?²²⁶
- Outline priorities for research and evaluation:
 - Where is new research needed to improve models of care?
 - Are publicly funded services regularly evaluated, and are results shared across jurisdictions?

224. Murphy et al (2023, Recommendation 9); Ford and Håkansson (2020); and Dowling et al (2015).

225. Reid et al (2024). The Murphy Inquiry recommended developing minimum gambling consumer protection standards for banks: Murphy et al (2023, Recommendation 13).

226. Ghaharian et al (2023); Auer and Griffiths (2023); and Delfabbro et al (2012).

- How can governments and industry better collect or share data to inform research and harm-prevention efforts?

Our other recommendations to reduce gambling exposure and introduce mandatory pre-commitment should significantly reduce gambling harm, and, consequently, demand for help services. But if the review finds that more funding for services and/or research is needed, governments could make up the gap by increasing gambling taxes and closing tax loopholes.

The federal government could impose a levy on online betting providers, as recommended by the Murphy Inquiry.²²⁷ And state and territory governments could close generous tax concessions and support arrangements for the gambling industry.²²⁸ Tax concessions for NSW clubs actually exceed the amount of tax they pay on their pokies revenue.²²⁹

State governments give away at least \$1.2 billion in pokies tax concessions for clubs²³⁰ – more than enough to cover the cost of improving support services.

227. 'The imposition of a harm reduction levy on online WSPs [wagering service providers] would provide a dedicated revenue stream to assist the national regulator to work with all jurisdictions to ensure that their funding and support is appropriately directed towards providing the treatment and support people experiencing gambling harms need, particularly the most vulnerable': Murphy et al (2023, p. 59).

228. For example, tax concessions on clubs' pokies revenue, hypothecated gambling tax revenue for the racing industry, and low point-of-consumption tax rates for betting relative to other forms of gambling.

229. In 2023-24, NSW clubs collectively paid \$941 million in tax on their pokies revenue, but received tax concessions worth \$964 million (compared to pokies in hotels). Clubs also received another \$73 million in tax rebates under the ClubGrants scheme. Big clubs benefited most: the top 5 per cent of clubs (with pokies profits of more than \$20 million) received more than half of the total value of club tax concessions: NSW Treasury (2024, Chart A2.2).

230. In Victoria, tax concessions for clubs were worth \$86 million in 2023-24 (compared with \$1.37 billion in total pokies tax revenue): Victorian Department of Treasury and Finance (2024a). In Queensland, \$139 million in 2023-24 (compared with \$1.04 billion in total pokies tax revenue): Queensland Treasury (2024) These are in addition to the concessions in NSW mentioned above.

4 Stand up to the vested interests

Preventing gambling harm will reduce the gambling industry's profits, so governments need to be prepared to stand up to strong vested interest pushback. The industry has a track record of thwarting reforms, including by stoking community fears about unintended consequences. These fears don't stand up to scrutiny.

The time is right for federal, state, and territory governments to come together to implement a coordinated reform package. Taking action together is likely to be the most effective way to take on the vested interests.

4.1 The window for reform is open

A window for reform to prevent gambling harm is open right now.

Recent Royal Commissions, reviews of Australian casinos, and the NSW Crime Commission's inquiry into money laundering through pokies have collectively sparked outrage around the country.

And disquiet about the proliferation of online gambling harm triggered the 2023 Murphy Inquiry, which made 31 recommendations supported by multi-partisan consensus – a rare feat. The federal government has taken more than 14 months to respond to the inquiry, but leaks last month on the potential response²³¹ sparked protracted debate in the media, parliament, and Labor's own caucus – showing how widespread the public support for reform is.

After decades of failed attempts, some state governments, notably Tasmania, are finally taking action on pokies.

And in NSW – the state with almost as many pokies as the rest of the country combined – the most recent state election was fought at least

231. Karp (2024).

in part on pokies reforms. While the policies being debated were more focused on money laundering risks than gambling harm, both major parties brought policies to the table.

This is the political moment for multi-jurisdiction, multi-partisan reform.

4.1.1 Strength in numbers: coordinate reform across jurisdictions

Taking action across all jurisdictions is likely to be the most effective way to stand up to the vested interests. It makes it harder for the industry to go after individual politicians, parties, or governments, as it has done in the past (see Chapter 2).

Every jurisdiction has work to do in preventing gambling harm, and reform will be easier and more effective if jurisdictions coordinate their efforts. But that shouldn't mean delaying state-based reform efforts, or waiting for laggards. If some jurisdictions fail to step up, others should push ahead without them.

The federal government should assemble a National Taskforce and consider financial and other incentives to bring everyone to the table. For example, the federal government could take full responsibility for regulating online betting, while still enabling states to collect online betting revenue through their point-of-consumption taxes.

The National Taskforce should:

- Implement the roadmap in Chapter 3 to prevent gambling harm;
- Share lessons and work through any state/territory border issues; and

- Consider closing tax concessions, raising taxes on under-taxed forms of gambling, and/or measures to lift low-taxing jurisdictions to align with other states.²³²

Coordinating reform across jurisdictions will make the changes simpler for people to navigate and strengthen governments to withstand vested interest pushback. This will be especially important given the roadmap will take several years to fully implement.

4.2 The industry's objections are mostly hot air

The gambling industry tries to make itself untouchable by stoking community fears. It argues that stronger gambling regulation will push people towards illegal gambling, or threaten things Australians care about: sport, clubs, jobs, or the occasional flutter.

These fears don't stand up to scrutiny. Governments should call out the industry's self-interest, and not be tempted to 'buy off' vested interests (Box 7). Gambling licences are a privilege granted by governments – they are not a right – and they do not override government responsibility to legislate in the best interests of the Australian people.

4.2.1 Sport, and free-to-air TV, will survive without gambling ads

Industry lobbyists claim that restricting or banning gambling ads would jeopardise the financial viability of sport, or the free-to-air TV industry. But these industries have adapted to advertising bans in the past, and would do so again.

232. The federal government could even impose a single, higher tax, and distribute the revenue to states. This might also resolve broader questions around state consumption taxes, raised by the High Court's decision to strike down Victoria's electric vehicle levy in 2023.

Box 7: Resist the temptation to buy off vested interests

Vested interests will probably call on governments to 'compensate' them – for example through new grants for community clubs or sporting codes. Federal and state governments should resist calls for indefinite, untargeted, or no-strings-attached assistance.

These sorts of grants are rarely the best use of public money and carry risks of political interference and poor value for money (think 'sports rorts').^a Grant schemes administered by clubs also have a poor track record for probity.^b

And investing 'just' a small amount of money is unlikely to quieten the vested interests anyway.

The pokies buyback option in Chapter 3 should be priced well below market value, giving venues an opt-out option only. This will offer some transitional support, but it should not fully 'compensate' for expected future pokies revenue that would only be achieved if our lax regulatory regime, and associated social harm, continues.

a. Wood et al (2022).

b. Victorian Public Accounts and Estimates Committee (2023); ACT Audit Office (2018); and Audit Office of New South Wales (2013).

Betting companies spend a lot on marketing to sports fans. They are highly visible through team and stadium sponsorships, broadcast and online ads, and deals with sporting codes.²³³

But gambling ads are not irreplaceable. If gambling advertising was phased out, as we recommend (Section 3.1.1 on page 28), those ad spots would not fade to black, nor be given away for free. Other advertisers would emerge. They might not be willing to pay quite as much, but the difference would be much less than the face value of the gambling advertising revenue.²³⁴

Sport sponsorships and ad spots are expensive because they are valuable: an opportunity to market to a highly engaged audience.²³⁵ Even former AFL CEO Gillon McLachlan (now CEO of Tabcorp) acknowledged that at least part of lost gambling sponsorship revenue would be replaced.²³⁶

The history of advertising regulation suggests that Australian sport and broadcasters will adapt (see Box 8 on the next page).

233. Major sporting codes receive a cut of every bet placed on their game. For example, the NRL was reported to earn \$50 million from 'product fees' in 2023, and the AFL about \$30 million to \$40 million a year: McClure (2022) and McGrath et al (2023).

234. Gambling companies spent \$162 million on TV advertising between April 2022 and May 2023: ACMA (2023). Hypothetically, if other advertisers were only willing to pay 80 per cent of what the gambling companies paid, the hit to TV ad revenues would be about \$32 million (less than 1 per cent of total free-to-air TV advertising revenue): Think TV (2023).

235. As Sportsbet's Chief Commercial Officer (now CEO) Barni Evans said in 2017, when the company started sponsoring the AFL: 'It's absolutely a premium media asset. . . It gets right to the heart of footy in the southern states and therefore it's an absolutely appropriate asset to go for and as a consequence is heavily sought after. Like in anything where there is a scarcity of resources and only one brand, or one person or one company can gain that resource that person is going to go through a competitive process and is going to have to work hard for it': Canning (2017).

236. McLachlan (2024, p. 31).

Some clubs are already forging ahead and swearing off gambling sponsorships as part of state government initiatives.²³⁷ For example, the South Sydney Rabbitohs were previously sponsored by Luxbet and Sportsbet, but joined the NSW Government's 'Reclaim the Game' program in 2022.²³⁸ The club's sponsorship revenue grew from \$8.9 million in 2021 to \$11 million in 2023.²³⁹ These programs are a good model for smoothing the transition away from gambling ad revenue for sport and media companies.²⁴⁰

4.2.2 Clubs can still serve their communities with less pokies revenue

Clubs argue that their pokies profits support the community. But estimates of their community benefits are highly inflated, and their most valuable contributions don't rely on pokies profits.

Clubs' net community contribution is small

Clubs claim they make direct community contributions and generate billions of dollars of social and economic value. For example, in 2022-23, NSW clubs gave \$121 million in community grants, and claimed that their social value amounted to \$9 billion. Victorian clubs reported 'community benefits' worth \$312 million.²⁴¹

These supposed benefits are a small fraction of community pokies losses. The average NSW local government area received \$946,000 in

237. The NSW Government's Reclaim the Game program partners with clubs who forego gambling sponsorship: NSW GambleAware (2024). Victoria and South Australia have similar programs: Victorian Responsible Gambling Foundation (2024) and SA Office for Problem Gambling (2024).

238. Ritchie (2022).

239. South Sydney Members Rugby League Football Club Limited (2024).

240. Similar replacement sponsorship programs were used when tobacco ads were banned: Holman et al (1997).

241. ClubsNSW (2023); and VGCCC (2023).

Box 8: Sport and TV companies adapted to the tobacco ad ban

The tobacco industry was a major sponsor of sport in the 20th Century, just like the gambling industry is today. Governments slowly pushed it out, first banning broadcast ads in 1976, and then sponsorships in 1996.^a

The tobacco and sports industries ran scare campaigns claiming that Aussie sport was under threat. For example, when a West Australian MP proposed banning sport sponsorships, the industry bought full-page newspaper ads portending that ‘you might never see your heroes battle out International cricket at the WACA again’.^b

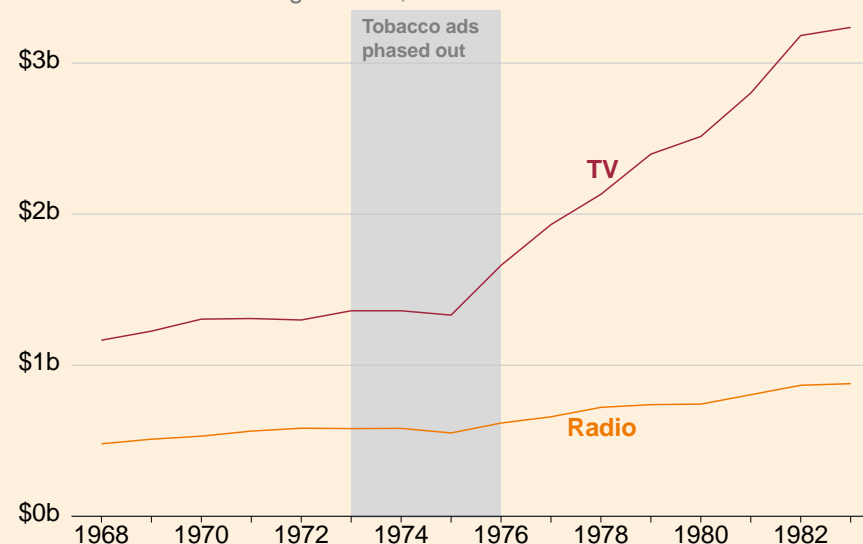
But when the bans were finally implemented, other sponsors – including state government public health agencies – quickly jumped into the openings. Rugby League’s Winfield Cup became the Optus Cup; Ansett and Carlton & United Breweries took over the Benson & Hedges cricket series.^c The total value of sports sponsorships grew by an average of 11 per cent per year in the three years after the ban was implemented in 1996.^d

Similarly, there was no dip in total TV or radio advertising revenue when the tobacco ad ban was phased in between 1973 and 1976 (Figure 4.1).

- a. A few state governments banned sponsorships before this, but federal law changed in 1992, and sponsorships were phased out by 1996: Greenhalgh et al (2024).
- b. Tobacco Institute of Australia (1983).
- c. Farrelly et al (1998); and Mitchell (2018).
- d. Lloyd (2000). This is despite tobacco sponsorships making up a big fraction – 22 per cent – of the total sport sponsorship market in 1989: Martin et al (1990, pp. 54, 67).

Figure 4.1: Broadcasters’ revenue didn’t decline after tobacco ads were banned

Commercial broadcasting revenue, 2024 dollars



Note: Colour TV was introduced on 1 March 1975.

Sources: Australian Broadcasting Control Board (various years), Australian Broadcasting Tribunal (various years) and ABS (2024c).

club grants in 2022-23, but lost 38 times that – \$36 million – on pokies based in clubs.²⁴²

But even these estimates are preposterously inflated.²⁴³ The main beneficiaries of ‘community grants’ are clubs themselves, and their affiliated entities. In NSW, just four of the 50 largest grants were made to registered charities.²⁴⁴ Most of the rest went to clubs themselves, or their associated golf or rugby league clubs.²⁴⁵ And 71 per cent of claimed community benefits in Victoria covered clubs’ own operating expenses, such as wages and utilities.²⁴⁶ Yet these ‘contributions’ are generously rewarded through tax concessions.²⁴⁷

Job transitions can be managed smoothly

Clubs and hotels also argue that tighter pokies restrictions would imperil jobs. This is misleading.

If the gambling industry declined, new opportunities would open elsewhere as consumers spent their money on other products. Very few people are employed in gambling-specific jobs: just 5 per cent of

club employees, and 3 per cent of pub employees, are pokies or betting attendants.²⁴⁸ Hospitality skills are highly transferable, so workers are likely to be in demand elsewhere in the service sector.

The lead time for implementing regulatory changes would give workers, clubs, and hotels plenty of time to adjust to any changes in staffing.²⁴⁹ The turnover rate is already high: just 28 per cent of people who were working in the clubs industry in 2016 were in the same industry five years later.²⁵⁰

Clubs can offer social connection and sport without gambling

Many clubs have managed to provide key social benefits – such as community meeting and sporting facilities – without relying heavily on gambling revenue. In fact, the most sports- and community-focused clubs tend to be smaller and less reliant on gambling revenue.²⁵¹

Western Australian clubs are prolific, despite being pokies-free (Figure 4.2). There are 1.93 clubs for every 10,000 adults in WA – about the same as in NSW (1.97), more than in Victoria (1.44) and fewer than in Queensland (2.16).²⁵²

Western Australians aren’t missing out on sports coaches, volunteering, or social connection either. These things don’t increase with pokies

242. In the year to November 2023. Grattan Institute analysis of NSW Liquor & Gaming (2024b) and ClubsNSW (2023).

243. ClubsNSW’s \$9 billion estimate includes \$6.4 billion of clubs’ revenue, \$920 million of capital expenditure, and \$1.2 billion of tax paid: Urbis (2023). These are private benefits and economic transfers, not net community benefits. If clubs weren’t open, most people would probably find another place to have their parma or beer.

244. Grattan Institute analysis of ClubsNSW (2023).

245. Clubs argue that, because they are not-for-profit organisations, subsidising their core activities is a community benefit: ClubsNSW (2024). But the benefit to the broader community is questionable. For example, some of the largest sport grants in NSW were made by the Seven Hills RSL Club for golf course maintenance: Seven Hills RSL (2023).

246. VGCC (2023).

247. In most states, the revenue that clubs earn from pokies is taxed lightly, compared with hotels’ pokies revenue, as long as clubs demonstrate their community benefits: Victorian Department of Treasury and Finance (2024b).

248. Defined as people employed as gaming workers, vending machine attendants, or betting clerks or managers in clubs or pubs, taverns, and bars. The proportion in the accommodation industry is even smaller (fewer than 1 per cent of employees are in gambling-specific jobs): Grattan Institute analysis of ABS (2022).

249. Productivity Commission (2010).

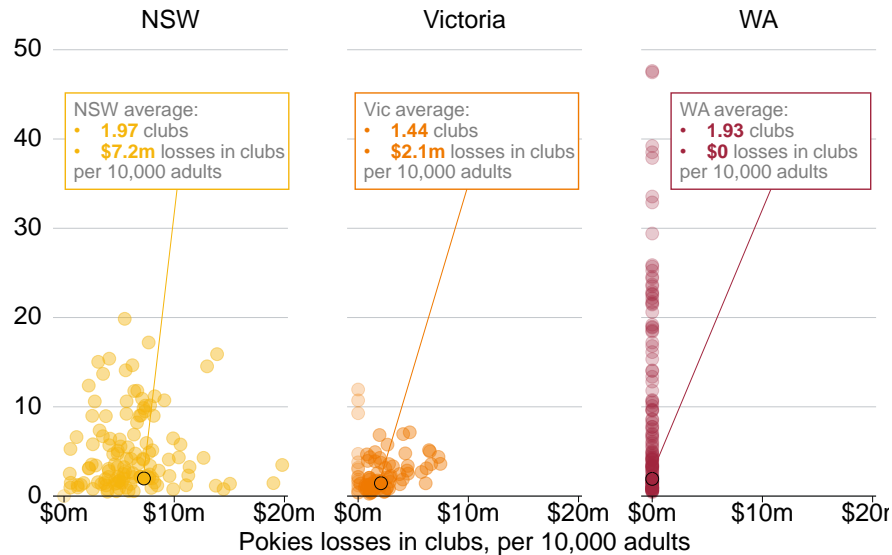
250. People employed in the ‘Clubs (Hospitality)’ industry: Grattan Institute analysis of ABS (2024d). This is not a COVID anomaly; the retention rate was similar – 31 per cent – from 2011 to 2016: ABS (2024e).

251. Productivity Commission (2010).

252. Based on venues registered for a club liquor licence in each jurisdiction; see notes to Figure 4.2.

numbers (Figure 4.3). But club turnover does: states with a higher concentration of pokies have more high-turnover ‘casino clubs’.²⁵³

Figure 4.2: WA residents aren’t missing out on clubs – just pokies losses
Clubs per 10,000 adults in local government area

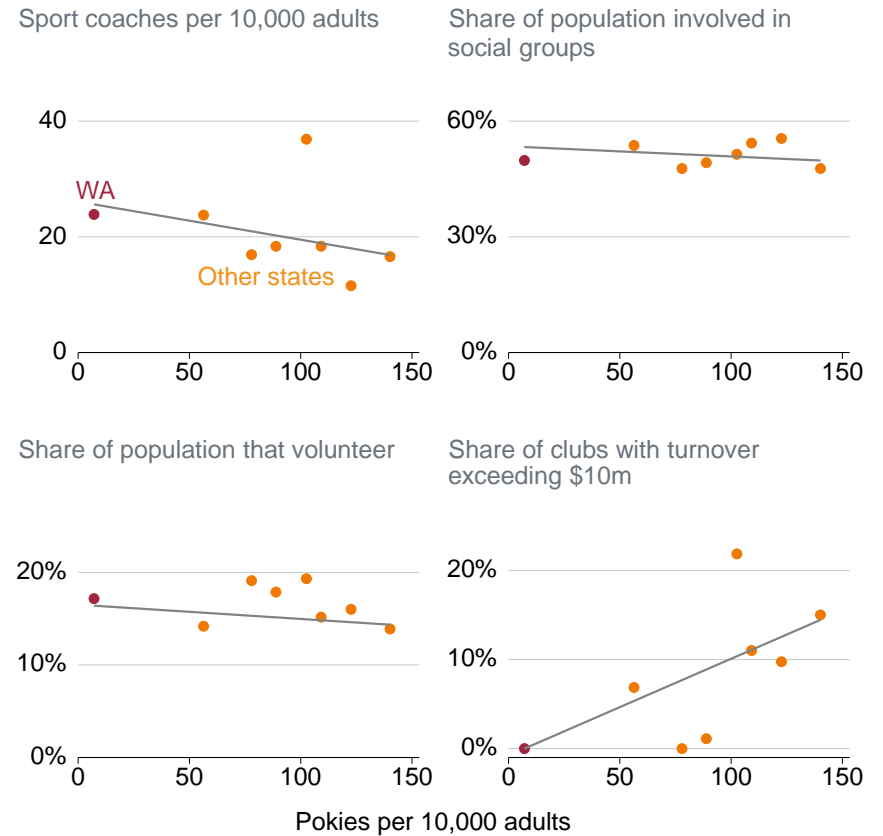


Notes: Pokies losses are losses incurred on pokies based in clubs. Each dot represents one Local Government Area (LGA). Several outliers are not shown: one small regional WA LGA that has the equivalent of more than 50 clubs per 10,000 adults, and six NSW LGAs that have club pokies losses exceeding \$20 million per 10,000 adults. Queensland is not included because the data on pokies losses are not disaggregated by venue type. Clubs are venues registered for a ‘club’ or ‘full club’ licence in each state.

Sources: Grattan analysis of ABS (2024f), NSW Liquor & Gaming (2024b), NSW Liquor & Gaming (2024a), WA Department of Local Government, Sport and Cultural Industries (2024), VGCCC (2024a) and Liquor Control Victoria (2024).

253. Con Walker (2009).

Figure 4.3: Club turnover, but not sport or social connection, increases with pokies prevalence



Notes: Each point represents one state. Lines of best fit are weighted by population.

Sources: Pokies per 10,000 adults, 2021: Queensland Government Statistician’s Office (2023); ABS (2024a). (1) People employed as sport coaches, instructors, or officials, by place of work, 2021: ABS (2022). (2) Been involved in social groups in the past year, 2019: ABS (2020). (3) Volunteering in the past year, 2021: ABS (2022). (4) Clubs (Hospitality) turnover, 2023: ABS (2023b).

Some communities are taking matters into their own hands and eschewing pokies in their clubs. Nine regional Victorian councils have banned pokies, and other communities are campaigning to follow suit.²⁵⁴

4.2.3 Most people will be unaffected by our proposed reforms

Our recommendations will not pose a significant burden on people who gamble harmlessly.

Pre-commitment for pokies would be a small, one-off hassle – like signing up for a library card or public transport card.²⁵⁵ For online gamblers, who must already prove their identity to create an account,²⁵⁶ it should add little to the sign-up process.

Most gamblers' spending will be unaffected by our proposed maximum limits (Figure 4.4). For example, 94 per cent of people who regularly use pokies report that they usually spend no more than \$500 a month – the proposed maximum limit in our scheme (see Box 5 on page 32).²⁵⁷ Most – 71 per cent – of those who report spending more than \$500 a month on pokies are at moderate or severe risk of gambling harm.²⁵⁸

Similarly, 96 per cent of people who regularly bet spend less than \$500 a month, and 59 per cent of those who spend more than this are at moderate or severe risk of gambling harm.

254. Belot (2023b).

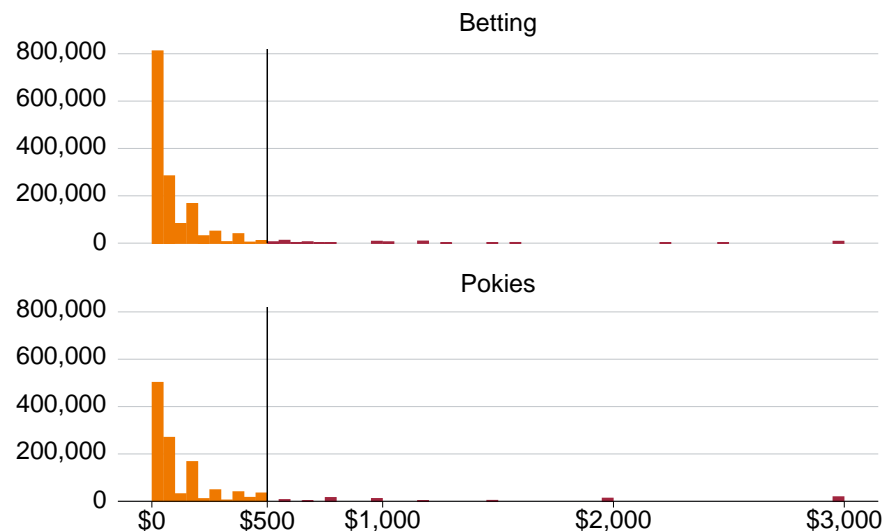
255. When carded pokies were trialled in Queensland in 2008 and 2009, 100 per cent of patrons agreed that the sign-up process was easy and straightforward: Queensland Department of Employment, Economic Development and Innovation (2009).

256. To meet AUSTRAC requirements, and check that the customer has not self-excluded via BetStop (see Box 1 on page 20).

257. Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (2023).

258. Classified as 'moderate risk' or 'problem gambler' on the Problem Gambling Severity Index: Grattan Institute analysis of Melbourne Institute for Applied Economic and Social Research (ibid).

Figure 4.4: The vast majority of people who gamble on pokies or betting spend less than our proposed maximum monthly loss limit of \$500
Number of people by reported monthly gambling spending, 2022



Notes: Only people with non-zero spending are shown. Each bar represents a \$50 interval of spending. For example, the first bar in the betting plot indicates that about 811,000 people spent between \$1 and \$50 a month betting in 2022. The bars at \$3,000 capture everyone spending \$2,950 a month or more: about 6,900 people for betting, and 18,000 people for pokies.

Sources: Melbourne Institute for Applied Economic and Social Research (2023).

Policy makers should be guided by data in choosing the regulated upper limits, and be prepared to withstand industry attempts to loosen the seatbelt by lobbying for higher limits.

4.2.4 The risk from legal gambling is bigger than the risk from illegal gambling

The industry contends that stronger regulation would push gamblers towards illegal gambling websites,²⁵⁹ which lack consumer protection measures.²⁶⁰ But the risk of illegal gambling is small compared with the known harm of the current environment.

Our proposed reforms do not curtail the availability of legal gambling websites. Setting a pre-commitment limit will add only a small friction to the sign-up process, and most people's spending already falls under our proposed maximum limits (Section 4.2.3). It is unlikely that there would be a major exodus to offshore providers to avoid these minor inconveniences.

The same goes for our proposed pokies reforms. When the Finnish government introduced mandatory pre-commitment for gaming machines in 2022, declines in gaming machine losses were not offset by increased spending on other forms of gambling.²⁶¹

There is a risk that some people in the grip of gambling addiction seek out unlicensed websites in a deliberate attempt to circumvent loss limits. But, under current regulations, legal websites are not much safer than illegal ones for heavy gamblers. Many legal gambling operators do not have effective safeguards in place to prevent harm (Chapter 2).

259. Under the *Interactive Gambling Act 2001* (Cth), it is illegal to provide or advertise certain types of gambling to Australians. These include: online casinos, sports betting without holding an Australian licence, and in-play betting on sporting events.

260. Responsible Wagering Australia (2023, p. 6).

261. Marionneau et al (2024).

Governments should focus on making legal platforms safer, blocking illegal platforms, and ensuring that people suffering harm can get good support services.

The Australian Communications and Media Authority has the power to block illegal online gambling services.²⁶² While these blocks are imperfect,²⁶³ they appear to be broadly effective. A gambling industry consultant estimated that the proportion of Australians' betting spend going to offshore providers almost halved in the five years after the powers were introduced.²⁶⁴

If the federal government is concerned about a rise in illegal gambling, there are many arrows it can add to the regulator's quiver to directly target illegal websites, rather than compromising protection for all.²⁶⁵

4.3 A price we're not willing to pay

The gambling industry's arguments don't stand up to scrutiny. But if they did, they would imply that some Australians must suffer immense harm so that others can pay a little less for sport, or punt a little more seamlessly.

262. Since the agency was given these powers in 2017, 1,026 illegal gambling and affiliate websites have been blocked: ACMA (2024c).

263. For example, they can be circumvented by virtual private networks and geoblockers, and operators sometimes launch 'mirror' websites after being blocked: Murphy et al (2023).

264. H2 Gambling Capital (2023).

265. For example, strengthening sanctions for companies and individuals who profit from illegal gambling; and developing a protocol for blocking transactions to illegal gambling operators, in cooperation with Australian banks and other payment system providers. See Murphy et al (2023, Recommendation 7).

Surveys suggest this is not what Australians want. Most Australians support loss limits for pokies²⁶⁶ and a gambling advertising ban.²⁶⁷

There are many situations where we collectively swallow a small inconvenience to protect fellow citizens – and ourselves – from harm.

In the 1960s and 1970s, Australia's road toll was high: about 3,800 people died in road accidents in 1970.²⁶⁸ Proposed safety measures such as seatbelts and random breath tests were met with consternation, including fierce opposition from pubs and clubs to random breath tests.²⁶⁹ But over time these measures have become part of life. And the road toll has more than halved, to 1,200 in 2022.²⁷⁰

We need the same approach to make gambling a safer, better bet.

266. Wesley Mission (2024b).

267. In a 2022 Australian Institute of Family Studies survey, 53 per cent supported a ban on 'all wagering advertising broadcast before 10.30pm on radio, TV, live-stream, and on-demand' (19 per cent opposed). And 47 per cent supported a ban on 'all social media advertising' (23 per cent opposed): Jenkinson et al (2023b).

268. Leake and N. Baker (2023).

269. Ibid.

270. BITRE (2023).

Appendix A: International examples

There are four main international examples of mandatory pre-commitment schemes that show it can be done and offer lessons for Australia.

Germany

Germany introduced a universal, mandatory pre-commitment system in 2021, with a maximum deposit limit of €1,000 (A\$1,625) per month across all licensed operators.

Gamblers must choose their own personal monthly limit, up to the maximum limit. Higher limits (above €1,000 per month) can be approved for people who pass an annual affordability check.²⁷¹

The German regulator administers a safe server system ('LUGAS'), which all licensed gambling operators must connect to. LUGAS combines a central playing activity file and a central deposit limit file to monitor gambling activity, prevent parallel accounts, and keep track of player limits.²⁷²

Norway

Norway has had a mandatory pre-commitment system for pokies since 2009, and maximum loss limits across all forms of gambling since 2016.²⁷³

Only two government-owned companies are allowed to offer gambling services to Norwegian citizens, which simplifies the system.²⁷⁴

271. Hambach et al (2023).

272. Ibid.

273. Public Gaming Magazine (2023); and Thomas et al (2016).

274. Thomas et al (2016).

The main company, Norsk Tipping, has a mandatory, maximum loss limit of NOK 20,000 per month (about A\$2,800) across all gambling products, with a lower limit of NOK 2,000 per month (about A\$280) for customers younger than 20 and lower limits on the riskiest games.²⁷⁵

All pokies in Norway are cashless and are connected to one central server that records all transactions and manages the limit-setting process.²⁷⁶ Gamblers must use their unique gambler ID to play, with all winnings paid into a bank account linked to the card. This system blocks children from gambling, prevents multiple accounts, and discourages people from borrowing someone else's card.²⁷⁷

Gamblers can choose to reduce their limits below the maximum, and can set time limits if they wish. Other features of the Norwegian system include mandatory breaks in play and permanent self-exclusion.²⁷⁸

These reforms have been accompanied by big drops in gambling losses, gambling participation, and calls to the Norwegian gambling helpline. The number of pokies was also cut heavily in parallel, with only about one in seven machines kept.²⁷⁹

Sweden

Sweden has had a mandatory pre-commitment system since 2014, but it does not have maximum limits.²⁸⁰

275. Public Gaming Magazine (2023). The second company, Norsk Rikstoto, supervises betting on animal racing and introduced maximum bet limits in 2021: Norsk Tipping (2021).

276. Thomas et al (2016, pp. 9–11).

277. Ibid (pp. 9–11).

278. Ibid (pp. 9–11).

279. Ibid (pp. 9–11).

280. Ibid.

All gambling providers who wish to obtain a Swedish gambling licence – including online providers – must agree to use the multi-provider pre-commitment system.²⁸¹

A single card, linked to the person's social security number, is issued to each gambler.²⁸²

Sweden introduced temporary maximum limits during the pandemic.²⁸³ But after limits were removed, and pandemic restrictions were lifted, gambling losses grew, and so did the number of people self-excluding.²⁸⁴

Belgium

In 2022, Belgium introduced maximum loss limits for online gambling, although their scheme doesn't operate across providers. Gamblers can deposit up to €200 (A\$325) per week per licensed website.²⁸⁵

Gamblers can set a higher limit if they apply to Belgium's Gaming Commission and pass a credit check. The standard limits are reimposed if there is any future default.²⁸⁶

281. Livingstone (2023c).

282. Thomas et al (2016).

283. Vixio (2022).

284. Thomas-Akoo (2023).

285. Walker (2022).

286. Fletcher (2022); and National Bank of Belgium (2022).

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