



SUBMISSION ON PRODUCTIVITY COMMISSION INQUIRY INTO GAMBLING

Commercial Radio Australia (**CRA**) welcomes the opportunity to comment on the Productivity Commission's inquiry into gambling. CRA is the peak national industry body for Australian commercial radio stations. CRA has 260 members and represents approximately 98% of the commercial radio broadcasting industry in Australia.

CRA acknowledges and supports the rationale behind the inquiry and is keen to assist in the development of a culture of responsible gambling in Australia.

A stringent co-regulatory framework already governs the advertising of gambling on radio and ensures that such advertisements are responsible and balanced. The existing framework of co-regulation – through the CRA Codes of Practice, the Australian Association of National Advertisers Code of Ethics, the Trade Practices Act and State and Territory laws - is working well to ensure the responsible advertising of gambling on radio.

Examples of state and territory gambling code requirements with which commercial radio stations comply in the relevant jurisdictions are as follows:

- Advertising must not depict or promote the consumption of alcohol while a person is engaged in the activity of gambling.
- Advertising must not focus exclusively on gambling where there are other activities to promote.
- Advertising should incorporate, where appropriate, positive responsible gambling messages.
- Advertising must not be implicitly or explicitly directed at minors or vulnerable or disadvantaged groups.
- Advertising must not include misleading statements about odds, prizes or chances of winning.
- Poker machine advertising is banned in both NSW and Victoria.
- All gambling advertising is restricted in South Australia between 6am and 8.30 am Monday to Friday.

Industry compliance with the existing co-regulatory structure is excellent. Neither the Advertising Standards Bureau nor any CRA members received recorded complaints in 2008 relating to the advertising of gambling on radio.

CRA's firmly held view is that further restrictions regarding the advertising of gambling on radio would be inappropriate, given the stringency of the current co-regulatory framework and the high levels of compliance within the commercial radio industry.

The burden that further restriction or prohibition of gambling advertising would have on commercial radio is disproportionate to any benefit that could be gained by the community, particularly as a small percentage of gambling advertisements (14.8%) in the community are transmitted by radio and there is no evidence to suggest that the current co-regulatory structure is not working effectively to ensure the responsible advertising of gambling on commercial radio.

CRA would welcome the opportunity to discuss or amplify any of these points with the Productivity Commission. The Commission should contact Joan Warner on 9281 6577 if it wishes to do so.