

GamCare public Response to the National Lottery Commission Consultation on the use of gaming and betting themes on National Lottery Scratchcard games

Gamcare provides support, information, advice and counselling to anyone suffering through a gambling problem.

GamCare welcomes the consultation for a transparent rationale for decisions to approve gaming and betting themes on NL Scratchcard games. GamCare is particularly pleased to see that the National Lottery Commission proposes to break away from using visual designs associated with 'hard gaming'.

GamCare responds to the following questions posed in the May 2008 consultation:

1) Is there any evidence, that the Commission should take account of, which suggests that the featuring of gaming or betting themes on National Lottery Scratchcards can lead to any player detriment, for example excessive play? Please cite research to support your views if possible.

GamCare is not aware of any research that suggests gaming or betting themes on a scratchcard can lead to player detriment, such as excessive play. GamCare is aware of a small number of callers and counselling clients citing Scratchcards as their main problem gambling activity. We are unaware, however, of any anecdotal evidence that suggests that there is a direct correlation between gaming or betting themed Scratchcards being cited as causing a problem over any other type of card. We would welcome any future research on the risk of this relationship.

2 & 3) Should National Lottery Scratchcards be associated with or feature gaming or betting themes? Please explain the advantages or disadvantages as you see them. Has the Commission identified the most appropriate option for addressing the use of gaming or betting themes on National Lottery Scratchcards?

The Commission's view to allow no hard gaming imagery seems acceptable and reflects our own experiences.

We believe the decision to no longer allow fruit machine imagery on Scratchcards is a positive step away from the precedent set by the previous approval of those visual designs. In our experience we are aware that fruit machines cause a significant number of gambling problems, particularly amongst younger problem gamblers.

4) Are the proposed exclusions appropriate, or can alternatives be suggested?

We support the view to not allow the use of the play mechanics of betting and gaming within a Scratchcard game. We notice that there are no exceptions made for Bingo

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and could not find your evidence for this decision. However, in our recent experience we are aware that interactive Bingo has been cited as a problem gambling activity we cannot offer any evidence to suggest that the use of Bingo imagery will cause a problem over any other type of card.

5) Do you have any other general or specific observations on the use of gaming or betting themes on National Lottery Scratchcards?

GamCare considers that the public perception of NL games per se would support the view that it is inappropriate to align lottery products with “hard” gaming themes.

6) Do you think the Commission should consult on the use of gaming themes in Interactive Instant Win Games in the future?

GamCare welcomes the proposal to consult on the future of IIWGs and gaming themes.

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