



# **Response to the National Lottery Commission's consultation on the use of gaming and betting themes on National Lottery Scratchcard games**

**Responsibility in Gambling Trust**

**August 2008**

## General Comments

1. RIGT welcomes the opportunity to provide feedback on the use of gaming and betting themes on National Lottery Scratchcard games and recognises the need for further clarity in regard to maintaining the clear distinction between gaming and betting products and National Lottery products. We note the National Lottery Commission's purpose in the consultation paper and provide our comments accordingly. RIGT supports the Commission's emphasis on:
  - Avoiding the potential for licensing games which may contribute to excessive play; and
  - Maintaining the clear distinction between gaming and betting products.
2. RIGT submits its comments in consideration of the impact that the proposed amendments may have on young people and vulnerable adults including problem gamblers who may play across a range of gambling products.
3. RIGT is unaware of any available research that specifically examines the issue of excessive play, gaming themes and scratchcards. However, we are aware of emerging Canadian research critical of the use of certain themes on scratchcards and their appeal to young people (Derevensky, 2008).
4. Given the absence of research examining the relationship between excessive play, gaming themes and scratchcards, RIGT recommends the Commission adopt a precautionary approach. RIGT also recommends the Commission undertake specific research in this area. We believe the research design should take into account specific population groups such as young people, vulnerable adults including problem gamblers and game themes associated with excessive play on gaming and betting products (Livingstone & Woolley 2008).
5. With suggested amendments, RIGT supports paragraphs 4.6, 4.7 and 4.8 in the Commission's consultation document. The suggested amendments are included in response to the consultation questions.

## Consultation Questions

6. *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.*

The Commission may wish to give consideration to research on gaming themes, gaming machines and excessive play which may provide some direction and insight on scratchcard products and excessive play. See Australian Productivity Commission, 1999; Schellinck & Schrans, 2004; Livingstone & Woolley, 2008.

7. *Should National Lottery Scratchcards be associated with or feature gaming or betting themes? Please explain the advantages or disadvantages as you see them?*

RIGT supports the Commission's clarification of the types of imagery permitted and not permitted under 4.6, 4.7 and 4.8. RIGT recommends the addition of the following as 4.6d:

- Named gaming machine / category B2 (FOBT) games.

RIGT also recommends amending the table in 4.8 to read:

| Theme | Imagery Permitted | Imagery not permitted   |
|-------|-------------------|---|
| Cards | Playing cards     | Reference to, use of play mechanics, words associated with or representations of casino card games such as poker, blackjack or baccarat, <i>and gaming machine or category B2 ( FOBT) game themes or names.</i> |

8. *Has the Commission identified the most appropriate option for addressing the use of gaming or betting themes on National Lottery Scratchcards?*

With our suggested amendments, we believe paragraphs 4.6, 4.7 and 4.8 should provide sufficient clarity for the licensee on 'soft' gaming themes on National Lottery Scratchcard games.

9. *Are the proposed exclusions appropriate, or can alternatives be suggested?*

See RIGT suggested amendments above.

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

RIGT recommends that the principle of clear separation between lottery and gaming/betting products be maintained and that themes designed to appeal to youth under 18 be avoided in National Lottery Products.

11. *Do you think the Commission should consult on the use of gaming themes in Interactive Instant Win Games in the future?*

RIGT considers it beneficial to consult on the use of gaming themes in Interactive Win Games.

**References:**

Australian Productivity Commission. (1999). *Australia's gaming industries*. Melbourne: Productivity Commission.

Derevensky, J. (2008). *Pre conference workshop on Prevention and Youth Gaming*. Workshop presented at the 7<sup>th</sup> European Conference on Gaming and Policy Issues held in Nova Gorica, Slovenia 1 – 4 July.

Livingstone, C. & Woolley, R. (2008). *The Relevance & Role of Gaming Machine Games & Game Features on the Play of Problem Gamblers*. Independent Gaming Authority, South Australia.

Schellinck, T. & Schrans, T. (2004). Identifying problem gamblers at the gaming venue: Finding combinations of high confidence indicators. *Gaming Research*, 16, 8-24.