To the Minister of Health and Attorney General and Justice, the Honourable Natasha Fyles

Dear Minister

Re: Stronger regulation of online gambling industry in the NT

We are writing to you as public health researchers with an interest in public health and addictive behaviours. The impact of COVID-19 has been unprecedented in Australian and internationally, with many governments severely restricting population movement to reduce the spread of the virus, leading to many millions of Australians becoming unemployed or under-employed, and many having to self-isolate in their homes.

While we welcomed the closure of gambling venues due to their inherent risk associated with transmission of COVID-19, we are concerned that with the stress of self-isolation at home people will engage in online gambling to an unprecedented degree. This is more concerning for people who may have recently become unemployed or under-employed, and for people now spending more time at home who may see gambling as a way to improve their financial situation.

Many gamblers will have experienced an increase in risk factors associated with harmful gambling. For example, many people are experiencing increased psychological distress and financial stress due to the impact of COVID-19 and subsequent instability associated with employment and accessing food and other essential daily items, and due to self-isolation guidelines. This will differentially affect younger adults, particularly men, due to a larger proportion of younger adults being employed in industries where COVID-19 measures have led to more closures and loss of jobs, and young men being at a higher risk of problem gambling.

Current regulation of gambling operators in the NT has been found to be lax, particularly in land-based venues as reported by ANU in the recently completed compliance study of land-based EGM venues. Investigative media has uncovered concerning practices by industry where gamblers that lose regularly are encouraged to keep betting and join VIP membership schemes, where they are groomed by industry offerings to keep gambling (and losing).

Most online gambling can be done continuously, and is therefore inherently riskier and more harmful, as gamblers can lose large sums of money in very short periods of time. The 2018 NT gambling prevalence survey found that online gamblers were classified as experiencing problem (6.4%), moderate risk (10%) and low risk (26%) problem gambling at significantly higher rates than non-online gamblers (1.3%, 4.2% and 11.1% respectively). That is, 43% of online gamblers are classified as at risk of problem gambling, compared with just 17% of non-online gamblers. Among online gamblers at risk of problem gambling, 45% experienced harm directly from their own gambling, compared with 31% of non-online at-risk of problem gambling gamblers. Gambling prevalence surveys in other jurisdictions have similar findings.

Of great concern is the increased risk current events pose to the NT Aboriginal and Torres Strait Islander population, who have significantly higher rates of problem gambling, and experience of harm from someone else's gambling, compared with non-Indigenous Territorians. In the 2018 NT gambling prevalence survey, just over 5% (one in twenty) of Aboriginal gamblers in the NT were classified as experiencing problem gambling and this increases to more than 20% for Aboriginal online gamblers.

We ask that the Northern Territory Government impose stricter regulation on the online gambling industry operating in the NT, which currently services not just NT residents, but most online gamblers around Australia. We recommend that online gambling companies located in the NT be regulated in two ways to ensure harms associated with gambling are reduced.

- (i) All gamblers be required to set mandatory daily and weekly spending limits.
- (ii) Credit cards cannot be used for gambling (consistent with land-based venues).

We hope you consider and implement these regulations, not just because of COVID-19, but in the interests of minimising gambling-related harms to gamblers, their family, friends and communities in the NT and Australia.

Yours sincerely

Dr Matt Stevens Associate Professor Charles Livingstone

Menzies School of Health Research (NT)

Monash University

Professor Samantha Thomas Emeritus Prof. Mike Daube

Deakin University Curtin University

Professor Peter Miller Emeritus Prof. Simon Chapman

Deakin University University of Sydney

Professor Fran Baum Professor Robin Room Flinders University La Trobe University

Dr Himanshu Gupta Professor Kyp Kypri
Menzies School of Health Research (NT) University of Newcastle

Dr Francis Markham Dr Marita Hefler

Australian National University Menzies School of Health Research (NT)