

Submission to
Petitions
Committee:

Prohibit the Advertising of Gambling

Petition of the
Problem Gambling
Foundation of
New Zealand



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Executive Summary



On behalf of our rūpū, the Problem Gambling Foundation (PGF Services), respectfully recommend that the House of Representatives prohibit the advertising of all gambling in Aotearoa New Zealand (pokies, casinos, Lotto, TAB and online gambling), including on traditional media and online platforms.

This recommendation is based on national and international evidence demonstrating the harmful influence of gambling advertising, particularly on populations that experience gambling harm disproportionately. It is further supported by strong public sentiment, as evidenced by our petition, reflecting increasing frustration over the ineffectiveness of regulation in this space.

Our submission is written in support of our petition which received 6,341 signatures, and in response to the growing public health impacts associated with gambling advertising in Aotearoa New Zealand (1).

Despite well-documented evidence that the advertising of gambling furthers gambling participation, normalises gambling, and has a significant impact on those already experiencing gambling harm, it continues to be pervasive across traditional and digital platforms.

Additionally, as the Government moves towards licensing up to 15 online casino operators, the volume of gambling advertisements is expected to increase significantly.

Unlike alcohol and tobacco, there are few regulations to restrict gambling advertising. Public health experts have highlighted that gambling advertisements present a substantial risk to children and young people. Gambling harm also disproportionately impacts Māori, Pacific peoples, and those from lower socioeconomic backgrounds.

According to the World Health Organisation (WHO), the rapid normalisation of gambling is being driven by commercialisation, digitisation, and the widespread use of sponsorship and marketing to fuel its global growth.

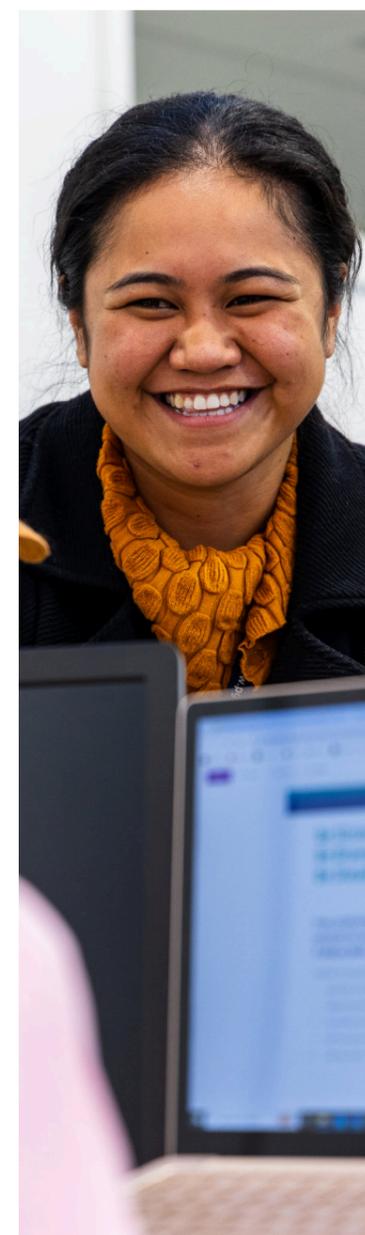
A more detailed analysis of the issues and evidence supporting our recommendation is provided within the body of this submission.

Te Tiriti o Waitangi

We acknowledge Te Tiriti o Waitangi as Aotearoa New Zealand's founding document which is fundamental to equitable social and health policy. However, the Gambling Act 2003 does not mention Te Tiriti. This not only reflects a lack of commitment to best protect Māori from gambling harm, but it also contradicts and breaches the principles of Te Tiriti. In considering the urgent need for regulatory change, it is critical to centre Te Tiriti o Waitangi and address the specific harms that gambling advertising continues to cause for Māori.

Our rūpū recognises the significance of Te Tiriti and is committed to meeting its responsibilities to improve Māori health outcomes. We understand that outcomes will improve for all New Zealanders through an equity approach, acknowledging that Māori and other population groups experience outcomes that are not only avoidable but unfair and unjust. This requires different approaches and resources that achieve fairer health outcomes.

Our recommendations are focused on ensuring all New Zealanders, including Māori, are reflected in regulations that prioritise the prevention and minimisation of gambling harm including the harm caused by gambling advertising.



The Public Health Risk of Gambling Advertising

The purpose of marketing is to attract new customers, create interest in gambling products, and grow a consumer base. It is a central tool used by the gambling industry to ensure its success and longevity (2,3).

These marketing techniques lead to the normalisation of gambling and gambling products, promote consumer demand, build product loyalty, create the perception that gambling is a fun activity, and embed gambling within valued social activities such as sports (4,5,6,7,8,9).

Impact on tamariki and rangatahi

Public health experts around the world have stated that gambling marketing poses a significant risk to tamariki/ children and rangatahi (6). Research has shown that young people have a very clear recall of gambling brands, and this starts from a very young age, with some studies showing as young as eight years old (10). The intended impact of such marketing tactics is to create a new generation of gamblers.

Children and young people are even more exposed in the online space to advertisements with very little to no restrictions for gambling operators. While there is a lack of research into the impact of social media and online advertising, it does not mean that there is no evidence of harm (11). Instead, there are growing concerns about its detrimental effects (6).

Advertising overseas gambling sites

In Aotearoa, the advertising of overseas gambling is illegal under the Gambling Act 2003 (12). However, offshore operators have been relentlessly targeting New Zealanders to grow their customer base. This has been made possible due to our unregulated grey market that cannot prosecute offshore operators for breaking the law.

Some examples include the aggressive marketing of 22Bet, who used former New Zealand cricketer Brendon McCullum as the face of their YouTube campaign, to appeal to the New Zealand market (13). The advertisements were misleading and were eventually removed by YouTube's parent company Google. There have also been multiple advertisements for Jackpot City, an offshore online casino website, on traditional media outlets such as television, radio, and billboards. This was possible as Jackpot City exploited a loophole in our law by promoting a free-to-play site where someone can play casino games without paying (14).

Our rōpū have heard from clients and members of the public about being targeted with advertisements from multiple offshore websites on various platforms, including social media, websites, and games. This excludes the advertisements that New Zealanders see daily from the authorised providers of online gambling, Lotto and TAB.

World Health Organisation response

According to the World Health Organisation (WHO), *the commercialisation of gambling in many countries, which also drives normalisation, is increasing the incidence of gambling harm. Sponsorship or other association with popular sporting leagues and the colocation of gambling products in social settings are key mechanisms. Aggressive promotion of gambling in popular and social media also increases gambling activity* (9).

The WHO states that universal, population-wide public health approaches are required to prevent gambling harm. These include ending gambling advertising, promotion and sponsorship of sports and other cultural activities.

In the WHO response to the global impact of gambling harm, it recognises the importance of Member States closely monitoring and robustly regulating gambling activities, products, and operations. This includes tackling stigma and shame associated with gambling, ending advertising and promotional activities, and prioritising upstream strategies to prevent and reduce gambling-related harm (9).

The Impact of Gambling Advertising on Priority Populations

The Ministry of Health has clearly identified priority populations in its Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024, recognising that the impacts of gambling are not felt equally across all communities. Māori, Pacific peoples, Asian communities and rangatahi are disproportionately affected, along with those experiencing socioeconomic disadvantage (15). This targeted approach reflects an understanding that gambling harm is both a public health issue and an equity issue, one that requires focused, culturally responsive action to reduce its reach and impact.

Māori

Māori experience disproportionately high levels of gambling harm. According to the 2020 Health and Lifestyles Survey, Māori people are 3.13 times more likely to be moderate-risk or high-risk gamblers compared to non-Māori, non-Pacific peoples. This inequity is compounded by access to online gambling platforms, with estimates suggesting that around 163,000 Māori participate in online gambling, including approximately 10,000 who gamble via unregulated offshore websites (16).

The gambling industry is strategically targeting Māori communities by engaging Māori influencers who have proven connections with large numbers of Māori followers.

The influencers are targeted by gambling providers and then placed in a position where their cultural influence is used to normalise gambling. The responsibility for the harm caused should not be placed on the influencers, but rather on the practices of the gambling industry, which exploits these connections to promote harmful gambling products.

Gambling advertising is a public health issue, and effective policy must centre Māori voices, aspirations, and tino rangatiratanga. It is imperative that government action reflects the communities these policies are intended to serve. Regulatory frameworks must be strengthened to control gambling advertising and eliminate its targeted reach into Māori communities (17).

Strong regulation of gambling advertising is urgently needed. Prevention strategies must be culturally appropriate, designed in partnership with Māori, and grounded in Te Ao Māori perspectives that strengthen whānau and collective resilience. The burden of responsibility must sit squarely with the gambling industry and with those responsible for regulating it, not with the individuals and communities who are living with the consequences of gambling harm.

Pacific Peoples

Gambling is a longstanding issue in Pacific communities, with a deep cultural stigma surrounding it. According to the 2020 Health and Lifestyles Survey, Pacific communities are 2.56 times more likely to experience moderate to serious gambling risks compared to non-Māori, non-Pacific populations (18). In Aotearoa, approximately 12,000 Pacific adults are affected by problem gambling, alongside 3,000 Pacific youth aged 15 to 24 (19). Alarmingly, 44% of Pacific problem gamblers are drawn to online gambling platforms, which are easily accessible, often unregulated, and heavily marketed through digital channels (20). With 63% of Pacific people experiencing financial hardship and 52% facing mental health challenges, these factors can contribute to a greater vulnerability to gambling harm, exacerbating existing social issues (21).

The role of advertising in this harm cannot be underestimated. Mele, a woman with lived experience of gambling harm, highlights the profound impact of online gambling advertisements. *"I grew up with a family who loved placing bets at TAB and going to races at Ellerslie Racecourse, seeing it as a 'hobby' or a 'family event,'"* she recalls. Over time, as gambling venues proliferated, the shift to online platforms made gambling even more accessible. She explains, *"Now I see commercials on TV from the TAB industry that are offering free dollars for people if they are new and wish to open an online account. This marketing is to entice people back to place TAB bets, so there is no longer a need to climb into a car and make your way to a local TAB or attend a racecourse anymore. There are now new ads appearing on social media for Pokie Gambling not on machines, but online."*

For Mele, this shift represents a risky trend: *"But for our young generation, this is dangerous, and it is an invitation to allow them to start gambling, get pulled in, and the results can be horrific."* The accessibility of online gambling, open 24/7 and available privately from home, removes the physical barriers that once kept some individuals away from gambling venues. *"Now we have a more discreet way of gambling—Online—but the results will still be just the same as public venues. More loss of money, and the 'House' always wins!"* she laments. Mele's story is a powerful reminder of how advertising and online platforms contribute to the hidden nature of gambling harm, particularly among vulnerable youth.

The Pacific community is disproportionately affected by gambling, and the rise of online gambling only intensifies the challenge. Addressing this issue requires urgent, culturally responsive, and community-led solutions, alongside stronger policies that protect Pacific families and reduce the devastating impacts of gambling harm.

Asian peoples

The exploitation of Asian cultural festivals, such as Lunar New Year and the Mid-Autumn Festival, is one of the most prevalent forms of gambling advertising targeting Asian communities in New Zealand. Gambling operators deliberately incorporate ethnic icons, such as images of dragon dances and red pockets, into their promotions to create a false association between gambling and cultural celebration. Red pockets, traditionally used by Chinese families to gift money as a symbol of good health and prosperity, have been co-opted by the gambling industry. For example, a gambling provider in New Zealand has repurposed this cultural practice by distributing "red pocket" vouchers that encourage visits to their venues, gambling participation, and alcohol consumption through free drink incentives. Similarly, the Chinese dragon, a revered symbol of luck and strength, has been misused in gambling advertisements timed to coincide with Lunar New Year festivities (22). This deliberate cultural appropriation not only distorts the meaning of these traditions but also normalises gambling as an acceptable, even expected, part of seasonal celebrations.

Beyond the misuse of cultural symbols, gambling advertisements targeting Asian communities are frequently delivered in Mandarin, Cantonese, and other Asian languages to foster a sense of familiarity and trust. By using native languages, advertisers lower psychological barriers and increase the perceived legitimacy of gambling promotions. Furthermore, these ads frame gambling as a social activity, leveraging the collectivist values prominent in many Asian cultures. Messages implying that participation is necessary to avoid social exclusion exacerbate peer pressure, particularly during festivals when family and community gatherings are central (23). Research indicates that such tactics are especially effective in Asian communities, where communal harmony and conformity often outweigh individual risk assessment (24). The combination of culturally tailored imagery, language-specific messaging, and social coercion creates a potent and harmful marketing strategy that disproportionately increases gambling participation and related harms within these populations.

Rangatahi

A key area of concern for our rōpū is the impact that gambling advertising is having on our children and young people. We have received a wave of complaints about increasingly aggressive marketing tactics being used by gambling operators. The TAB's "betcha" brand which is aimed at 18-to 29-year-olds offers inducements such as deposit matches and targeted campaigns on social media platforms such as TikTok. Parents and teachers have raised concerns about children discussing sports betting at school, underscoring the urgent need to develop robust policy measures that protect young people from early exposure to gambling.

It is known that in Aotearoa New Zealand, children are being exposed to significant levels of gambling advertising, raising serious concerns about the potential long-term impact on their well-being. Research from the University of Otago's Kids' Cam study has shown that tamariki in cities such as Wellington encounter up to seven gambling advertisements every day, mostly via outdoor signage around dairies, shops, and community spaces (25). Alarmingly, this figure does not include exposure through digital platforms like YouTube, in-game apps, or social media channels that play a dominant role in children's daily lives and are largely unregulated in this context.

This level of exposure aligns with global concerns raised by the WHO UNICEF Lancet Commission, which identifies commercial exploitation, including the marketing of harmful products such as fast food, alcohol, tobacco, and gambling, as one of the most significant modern threats to children's health. The Commission cautions that such advertising can distort children's understanding of risk, normalise harmful behaviours, and shape their attitudes toward these products from a young age (26).

New Zealand is a signatory to the UN Convention on the Rights of the Child, which affirms every child's right to protection from practices that may harm their development or well-being (Article 36) (27). The current gambling advertising environment in Aotearoa falls well short of this standard. Early and repeated exposure to gambling messages increases the risk of future gambling harm, particularly for children living in socioeconomically disadvantaged communities. These advertisements can embed a view of gambling as not just normal, but as a legitimate pathway to success and financial freedom.

Although the Advertising Standards Authority (ASA) states that gambling ads should not target or appeal to children, we are concerned that this principle is not being meaningfully enforced (28). Advertisements like those for Lotto featuring brightly coloured balls, uplifting music, and storylines that evoke hope are highly appealing to children (29). For those growing up in poverty, such messages may suggest that gambling is the key to a better life. This is not just misleading, it is predatory.

Lived Experience

The Impact of a Social Media Influencer

The promotion of online gambling by social media influencers presents a significant public health concern, particularly for individuals already experiencing gambling harm. Influencers often portray gambling as an entertaining and aspirational activity, frequently omitting the risks involved. This content can be especially difficult for those in recovery or at risk of relapse, as it serves as a persistent trigger and reinforces harmful norms around gambling.

The story below highlights this. Note that this has been anonymised to protect the privacy of the person and the New Zealand social media influencer:

"I was a loyal supporter of _ and even subbed to her private page for 4 years.

I was scrolling Facebook one morning and I saw her story and it was a gambling video with a link. I was so shocked!! I felt let down, disappointed & upset. She had built her platform on addiction recovery and was now pushing addiction back to the very demographic who followed her for her story in the first place!!!! I messaged her & she was very dismissive. [She said] My triggers are mine & I should do what I need to do.

Pretty soon after that I relapsed on the gambling because I saw links everywhere. I foolishly thought 'maybe this time' but NOPE. Everyone was talking about them!!! The addiction tried again.

Since then I have been gambling free. Urges still arise but we're good.

If I hadn't seen online gambling being promoted online, I would have been fine.

Anyway she blocked me so ka kite lol"

Gaps in New Zealand's Gambling Advertising Framework

New Zealand's current regulatory framework for gambling advertising, is primarily governed by the Gambling Act 2003 (12) and supported by the Advertising Standards Authority's (ASA) Gambling Advertising Code (2019) (28). There are significant shortcomings from a public health perspective. While Section 16 of the Gambling Act prohibits the publication of overseas gambling advertisements within New Zealand, this legislation was enacted before the widespread emergence of online gambling, social media, and digital platforms. This makes it increasingly inadequate for addressing the modern advertising tactics used by gambling operators.

The Gambling Advertising Code is intended to ensure that gambling promotions meet high standards of social responsibility, including prohibitions on targeting children and the depiction of gambling as glamorous or risk-free.

Offshore operators now routinely use social media influencers and algorithmic targeting to promote gambling, often slipping through the cracks of existing regulation. Despite promoting "free-to-play" versions of their platforms, these advertisements often serve as pathways to real-money gambling. The Department of Internal Affairs (DIA) has recognised that such tactics violate the protections established under the Gambling Act. John Sneyd, the DIA's General Manager of Regulatory Services, expressed concern, stating, "We see those sites as just being a gateway to an online gambling site where you can spend real money. We're pretty clearly of the view that that advertising doesn't meet New Zealand legal requirements and is unlawful." (30).

It is imperative that the enforcement of existing rules is effectively resourced. The DIA who holds this responsibility requires sufficient capacity to effectively regulate the growing volume of digital gambling promotions. Meanwhile, breaches of the ASA's Gambling Advertising Code are largely complaint-driven with the consequences of these breaches varying depending on the ruling.

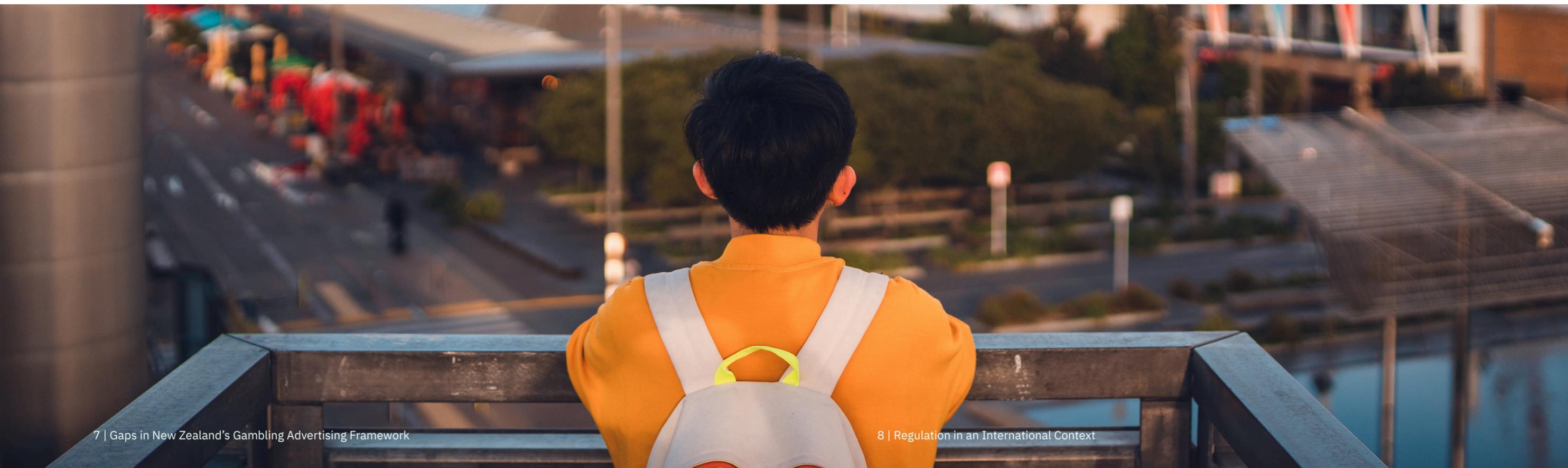
Without robust oversight or clear consequences, harmful advertising practices can continue unchecked, particularly in the digital sphere where vulnerable individuals, including rangatahi, are increasingly exposed. This regulatory vacuum underscores an urgent need for comprehensive reform. A modernised, well-resourced framework is essential to ensure that Aotearoa's advertising laws can meaningfully uphold public health and protect our communities from the escalating harms of gambling promotion.

Regulation in an International Context

Comparatively, many jurisdictions internationally have adopted far more stringent measures to regulate gambling advertising than those currently in place in Aotearoa New Zealand. The United Kingdom, under the Gambling Act 2005, requires all gambling advertisements to be socially responsible and prohibits targeting vulnerable groups, including children (31). Enforcement is overseen by the Advertising Standards Authority (ASA) and the Committees of Advertising Practice (CAP) (32). More recently, the UK Government's Gambling White Paper (2023) (33) introduced tighter controls on promotional offers and spurred moves such as the Premier League's voluntary front-of-shirt sponsorship ban from 2026 (34).

Australia also takes a multifaceted approach through both federal and state jurisdictions. The Australian Communications and Media Authority (ACMA) enforces strict time-based restrictions on gambling ads during live sports, banning them between 5:00 am and 8:30 pm (35). The Interactive Gambling Act 2001 further prohibits advertising certain forms of online gambling, with additional layers of regulation provided by individual states and territories, all focused on reducing exposure and preventing harm, particularly among younger audiences (36).

Meanwhile, several countries have introduced near-total or complete bans. Italy's Dignity Decree (2018) banned gambling ads across all media (37). Spain's Royal Decree 958/2020 imposed late-night advertising windows and eliminated sports sponsorships (38). Belgium introduced sweeping bans in 2023, with further restrictions to phase in by 2028 (39). Norway, with a state-run monopoly, has tightly curtailed all gambling promotions (40).



Recommendation

A Complete Ban:

We recommend that the House of Representatives **prohibit the advertising of all forms of gambling in Aotearoa New Zealand, including pokies, casinos, Lotto, TAB, and online gambling**, across both traditional media and online platforms.

As stated in our executive summary, this recommendation is supported jointly by PGF Services, Mapu Maia, Asian Family Services, and Purapura Whetu. It reflects the serious harm caused by gambling advertising, particularly to vulnerable communities, and is underpinned by strong public support as demonstrated through our petition.

We acknowledge the government's intention to permit some level of advertising in relation to the auctioning of 15 online casino licenses. In light of this, we wish to clearly state that should the government proceed with a licensing framework for online casinos, we strongly urge the implementation of strict and comprehensive restrictions on gambling advertising. Any such regulatory framework must prioritise the prevention and minimisation of gambling harm over commercial interests.

We also note the need to caveat this recommendation with regard to Class 3 lotteries, non-commercial fundraising lotteries such as the Heart Foundation and Coastguard. These charity lotteries pose a low risk of gambling harm and may require a differentiated approach within any future legislative or regulatory settings.

Should any further detail be required regarding our views on advertising in the context of the upcoming online gambling licensing process, we would be happy to refer the Committee to our Online Gambling Position Paper, which outlines our views in more depth (41).



About the Authors

PGF Services

At PGF Services, our mission is to enhance the mana of all people by preventing and minimising gambling-related harm. We are a charitable trust operating nationally with services delivered under contract to Te Whatu Ora and funded from the gambling levy. PGF Services deliver treatment and public health services nationwide and have a skilled and diverse workforce with staff who are qualified in clinical work and in health promotion.

Asian Family Services

Asian Family Services (AFS) is a nationwide non-governmental organisation in New Zealand that provides a wide range of social and mental wellbeing services tailored to the Asian community. AFS specialises in minimising gambling harm through clinical interventions, public health, Multi Venue Exclusion (MVE), peer support, and cultural support. Our Asian helpline offers multiple languages, including Mandarin, Cantonese, Hindi, Korean, Japanese, Thai, Vietnamese, and English. Additionally, AFS offers other mental wellbeing services, such as psychological services, school-based mental wellbeing services for children and youth, and parenting programmes, available both in person and online through qualified bilingual clinicians. Our service is also at the forefront of research focused on gambling harm, mental health, and addiction issues within the Asian community.

Mapu Maia

MapuMaia is a national Pasifika service created by Pasifika with a focus on catering to different communities in Aotearoa and is dedicated to achieving healthier and more equitable health outcomes. Our goal is to build resilience against gambling harm through our integrated service model of practice, which is grounded in VŌ Tagata and Pacific values. Supported by Te Whatu Ora (TWO), we deliver crucial public health services and clinical interventions. Our primary focus is to reduce gambling harm within communities by offering individual and family counselling and social support services. We provide counselling for both those directly affected by gambling and their families. In collaboration with Problem Gambling Foundation (PGF), and Asian Family Services (AFS), we advocate for and actively contribute to the development and implementation of public policies aimed at preventing and minimising gambling harm in our communities, especially in our priority populations.

Purapura Whetu Trust

Established in 2002, Purapura Whetu Trust is a kaupapa Māori health, wellbeing and social service provider in Waitaha, Aotearoa (Canterbury, New Zealand). We support whānau to get well, stay well, live well, and reach for the stars and beyond. Combining clinical, cultural, and community support that embrace the Māori view of wellbeing, our services are provided to all ages at no cost and continue to expand to meet the needs of whānau. Last year, we were funded to provide a gambling harm minimisation service, which we've named Te Huinga Kōtuku. The service includes clinical service provision to Māori communities in Canterbury and the West Coast and public health and education services to the South Island. Purapura Whetu Trust is also a founding member of Te Kahui Mokoroa – a national collective of Māori public health providers focused on reducing the gambling harm experienced by all Kiwis, including Māori.



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