



New Zealand House of Representatives
Te Whare Māngai o Aotearoa

Petitions Committee

Komiti Whiriwhiri Take Petihana

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**Petition of Problem Gambling Foundation of
New Zealand: Prohibit the advertising of
gambling**

Presented to the House of Representatives
by Greg O'Connor, Chairperson

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Petition of Problem Gambling Foundation of New Zealand

Recommendation

The Petitions Committee has considered the petition of Problem Gambling Foundation of New Zealand—Prohibit the advertising of gambling—and recommends to the Government that it review the regulatory settings around gambling advertising in New Zealand.

Request for prohibition of gambling advertising

This petition was signed by 6,188 people on the Parliament website and on paper. It was presented to the House by Todd Stephenson on 25 March 2025 and requests:

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; and note that 153 people signed a petition in support of this.

Comments from the petitioner

The Problem Gambling Foundation of New Zealand provided us with a written submission in support of its petition. The submission was co-authored by community organisations Asian Family Services, Mapu Maia, and Purapura Whetu Trust. The petitioner considers that gambling advertising is a public health issue, and requests a complete prohibition on the advertising of gambling across all media platforms.

New Zealand's regulatory framework

In its submission, the petitioner described the current state of gambling advertising rules in New Zealand. Gambling advertising rules are set out in the Gambling Act 2003 and the Advertising Standards Authority's Gambling Advertising Code. The Act prohibits advertising by gambling operators that are not based in New Zealand, and the code sets out an expectation that gambling advertising is not targeted at children or young people, or communicated in a way that is likely to condone or encourage gambling harm.

The petitioner commented that the current regulatory framework does not adequately control gambling advertising by overseas operators. We heard of overseas operators promoting free-to-play versions of their games, which can be advertised more freely than real-money gambling. We heard from the petitioner that these free-to-play games can act as gateways to real-money gambling.

The petitioner pointed out some differences between gambling advertising rules in New Zealand and in other jurisdictions. We heard from the petitioner how gambling advertising is regulated in several other jurisdictions:

- **United Kingdom**—In the United Kingdom, there is a statutory requirement that all gambling advertisements are socially responsible. Gambling advertisements are also prohibited from targeting vulnerable groups.
- **Australia**—Gambling advertisements are prohibited during live sports events at certain times of day. Advertising certain forms of online gambling is also prohibited.
- **Italy**—Gambling advertising is prohibited.
- **Spain**—Gambling advertisements on TV and radio are restricted to limited late-night hours.
- **Belgium**—Advertising gambling is only permitted by licensed operators under strict regulations.
- **Norway**—Norway operates a state gambling monopoly, which can advertise under restrictions.

Impact of gambling on Māori, Pacific, and Asian peoples

Of concern to the petitioner is the effect of gambling advertising on minority ethnic groups. It referred to a document from the Ministry of Health which states that Māori, Pacific, and some Asian peoples are disproportionately affected by gambling harm.¹

The foundation expressed concern that the Act does not mention Te Tiriti o Waitangi. The petitioner believes that the gambling industry is targeting Māori communities through Māori social media influencers. It maintains that gambling operators use the cultural influence of these influencers to normalise gambling in these communities. We heard that Māori are 3.13 times more likely to be moderate- or high-risk gamblers than non-Māori, non-Pacific peoples. We also heard that the rate for Pacific people is 2.56 times that of non-Māori, non-Pacific peoples.²

The petitioner said that gambling operators make use of Asian cultural festivals to target Asian communities in New Zealand. We heard that operators use ethnic icons to create an association between gambling and cultural celebration. The petitioner referred us to research about gambling among Asian communities in New Zealand, expressing concern that some of these advertising strategies are particularly effective due to collectivist values shared by many Asian cultures.³ The petitioner believes that this set of advertising strategies increases gambling rates among Asian communities, relative to other populations.

Impact of gambling on young people

The petitioner also shared its concern about the impact of gambling harm on young people, and the exposure of young people to gambling advertising. We heard about TAB's Betcha advertising brand, which is marketed toward younger people using social media such as TikTok.

¹ Ministry of Health, Strategy to Prevent and Minimise Gambling Harm 2022/23 to 2024/25.

² Te Whatu Ora, Health and Lifestyles Survey 2020/2021.

³ Amritha Sobrun-Maharaj, Fiona V Rossen, and Anita S K Wong; Negative impacts of gambling on Asian families and communities in New Zealand, August 2013.

The petitioner also mentioned the UN Convention on the Rights of the Child, to which New Zealand is a signatory. Article 36 of the Convention states:

[Parties to the Convention] shall protect the child against all other forms of exploitation prejudicial to any aspects of the child's welfare.⁴

The petitioner believes that New Zealand is failing to meet this obligation by allowing children to be exposed to gambling advertising. We heard that early exposure to advertising increases the risk of gambling harm, and the petitioner raised concern that this advertising can present gambling as a pathway to success and financial freedom. It pointed to some of Lotto's advertisements. These use bright colours and hopeful storylines, and the petitioner is concerned that such advertisements may appeal to children, particularly those living in poverty.

Comments from the Department of Internal Affairs

The Department of Internal Affairs provided a submission in its capacity as New Zealand's primary gambling regulator. Although it does not support the petitioner's request, it does support some restrictions on gambling advertising.

We heard about the department's work on the Online Casino Gambling Bill. This bill is currently being considered by the Governance and Administration Committee, and proposes to establish a licensing regime for online casino gambling. This would allow a limited number of overseas gambling operators to advertise and operate in New Zealand. The department commented that some advertising for online gambling is necessary to ensure gamblers are directed to operators within the regulated market.

The department said that it undertook research on the effects of gambling advertising during its work on online casino gambling. It found that for those who do not gamble, exposure to gambling advertising is associated with susceptibility to gambling in the future. For those who already gamble, gambling advertising contributes to a positive perception of the activity. It also found that young people are vulnerable to making risky gambling choices. The department acknowledged that some minority ethnic groups are particularly vulnerable to gambling harm. In addition to those groups identified by the petitioner, we heard that disabled people, older people, women, and families on low incomes are all vulnerable populations.

Under the current regime, some classes of gambling must provide a financial return to the community, or to a relevant industry. The department told us that granting the petitioner's request would likely reduce the available funding for community groups, and the amount of funding for industries such as racing and sports.

The department acknowledged the petitioner's comments about overseas jurisdictions. We heard that a growing number of European jurisdictions are introducing restrictions on gambling advertising. Most of these jurisdictions implemented advertising restrictions following a liberalisation of their respective gambling markets, to mitigate increases in harm and a reduction in social licence. As current regulatory settings are focused on enhancing

⁴ United Nations, Convention on the Rights of the Child, November 1989.

consumer protections and minimising gambling harm, the department does not believe that New Zealand is in the same position as those jurisdictions.

Comments from the Gaming Machine Association of New Zealand

The Gaming Machine Association of New Zealand represents societies that operate non-casino gaming machines. The association does not support the petitioner's request and does not believe that a one-size-fits-all approach to gambling advertising rules is appropriate. It argued that regulations should be targeted at distinct types of gambling, with proportionate restrictions and controls for each type. It believes the current advertising restrictions for non-casino gaming machines are sufficient. It told us about the following restrictions:

- **Visibility**—Machines and advertisements for jackpots are not permitted to be visible from outside a non-casino gaming venue.
- **Terminology**—A non-casino gaming venue may not imply that it is a casino by use of the word “casino” or otherwise.
- **Advertising costs**—The societies that operate gaming machines are not permitted to incur costs that relate to advertising on TV, on radio, or through social media influencers.

The association agrees that some restrictions are necessary on the advertising of online gambling. We heard that the Online Casino Gambling Bill will provide tools to control the advertising of online gambling. The submitter observed that the regulation-making powers in the bill will allow restrictions to be imposed that limit the target audience of advertisements as well as the media format of those advertisements. Nevertheless, it has some concerns about the bill and has raised these in a separate submission to the Governance and Administration Committee.

Comments from Lotto NZ

We heard from the New Zealand Lotteries Commission (Lotto NZ), a Crown entity governed by the Act. Lotto NZ agrees with the petitioner that gambling advertising has the potential to cause harm, especially to vulnerable populations. However, Lotto NZ does not support a prohibition on its own advertising.

Lotto NZ believes that its draw-based games such as Lotto and Powerball have a lower risk of causing harm than other types of gambling, as they do not provide instant gratification. However, Lotto NZ still takes measures to minimise harm when deciding where and how to advertise. We heard that it does not use social media influencers, and that it designs its advertisements to appeal to those over the age of 25, to avoid targeting children and young people. It also avoids placing advertisements in media or at locations where populations that are vulnerable to problem gambling will be over-represented in the audience.

We heard that Lotto NZ believes there are gaps in New Zealand's rules for gambling advertising. It commented that social media and online gambling are not at present covered by the Act. Lotto NZ agrees with the petitioner that New Zealand can learn from other

jurisdictions but does not believe that the overseas evidence lends support to the petitioner's request for a complete prohibition on advertising. We heard that it supports the introduction of a requirement that advertising not be targeted at vulnerable populations, such as in the United Kingdom. It also pointed out that the Italian National Lottery is exempt from the country's prohibition on gambling advertising, and that the prohibition is under review due to concerns that it may have resulted in many people gambling through the black market, rather than through licensed operators.

Comments from TAB NZ

TAB NZ is the statutory body established by the Racing Industry Act 2020 to operate betting services for racing and sports. It does not support the petitioner's request.

TAB NZ suggested that the effect of gambling advertising in New Zealand is less severe than in other jurisdictions, due to this country's restricted gambling market. We heard that Lotto NZ and TAB NZ are the only gambling operators currently permitted to advertise in New Zealand. TAB NZ emphasised the importance of advertising to channel those who wish to gamble toward licensed operators.

TAB NZ pointed to research showing that moderate-risk and high-risk gamblers engage in overseas online gambling significantly more than in domestic gambling. It said this suggests that advertising by TAB NZ and Lotto NZ does not exacerbate problem gambling in New Zealand.

Link between exposure to gambling and harm

The Gaming Machine Association and the petitioner, the Problem Gambling Foundation, both discussed the relationship between exposure to gambling and gambling harm in their respective oral submissions. We were particularly interested in this discussion, so we invited both to provide further submissions on this relationship.

Exposure and adaptation

The association challenged the assumption that an increase in exposure to gambling will increase the rate of gambling harm. It invited us to consider some long-term research that supports an "adaptation" understanding of gambling harm. It pointed us to work from New Zealand researcher Max Abbott, suggesting that gambling harm may plateau or even decrease after a population has adapted to an increased availability of gambling. Abbott says that this process may take only a few years.⁵

The association referred us to an article titled *Adoption, Adaptation, or Exposure? Novel Digital Gambling Activities and Links with Gambling Problems*.⁶ It highlighted the following section:

People who are more vulnerable to a gambling problem are more likely to adopt novel gambling forms, consistent with their tendency to gamble on

⁵ Max Abbott, [Gambling and Gambling Harm in New Zealand: a 28-Year Case Study](#), May 2017, p 6.

⁶ Nerilee Hing, Matthew Rockloff, and Matthew Browne; [Adoption, Adaptation or Exposure? Novel Digital Gambling Activities and Links with Gambling Problems](#), March 2023.

many forms. The high prevalence of gambling problems cannot be accounted for by the exposure effect alone, unless one assumes, implausibly, that these novel forms are dramatically more toxic than established products.

The article goes on to discuss the exposure and adaptation effects in terms of the lifecycle of a new gambling product. It observes that the introduction of a new product does increase the prevalence of gambling harm at first. Later, this prevalence plateaus or declines as the population adapts to the new product. The authors are careful to highlight that interventions are needed to mitigate harm when new gambling products are introduced.

The petitioner commented that the adaptation model is outdated and has been inappropriately applied in the context of gambling. The petitioner shared research that uses tools developed for alcohol research to model the effects of exposure to gambling. That research indicates that an increase in gambling in a population will also increase the rate of gambling harm in that population.⁷

The Parliamentary Library provided us with an overview of recent research, which generally supports the idea that exposure to gambling advertising can create positive attitudes toward gambling and increase the chance that a person is harmed by problem gambling.

Harm experienced by low-risk gamblers

The petitioner emphasised that gambling harm is not limited to the 2.4 percent of adults who are classed as moderate-risk or problem gamblers. The Ministry of Health's 2017 study *Measuring the Burden of Gambling Harm in New Zealand* demonstrated that 48 percent of gambling harm occurs among people classified as low-risk gamblers.⁸ Roughly 8 percent of adults fall into the low-risk, moderate-risk, or problem-gambler classifications. The petitioner commented that low-risk gamblers may experience gambling harm such as food insecurity and domestic disputes over finances.

Our response to the petition

We thank the petitioner for raising this important matter with us, and we thank the other submitters for engaging in the petitions process.

One concern raised by submitters was the effect that a prohibition might have on funding for community groups and the sports and racing industries. While we recognise that many of these groups receive funding from gambling revenue, we note that this revenue comes from communities in the first place.

We are aware that the Governance and Administration Committee is currently considering the Online Casino Gambling Bill. This bill would change the gambling advertising landscape in New Zealand by allowing some overseas operators to advertise. The bill would place some limits on advertising by these operators, but we acknowledge that an increase in gambling advertising may encourage more people to gamble. The evidence and advice we

⁷ Viktorija Kesaite, Heather Wardle, and Ingeborg Rossow; [Gambling consumption and harm: a systematic review of the evidence](#), 2024.

⁸ Ministry of Health, [Measuring the Burden of Gambling Harm in New Zealand](#), May 2017.

considered suggests that this may result in an increase in gambling harm, at least in the short term.

We acknowledge that the Advertising Standards Authority's Gambling Advertising Code sets out rules and principles for advertising that operators must adhere to. We appreciate that some New Zealand gambling operators place further limits on their own advertising to ensure that advertising is not directed toward vulnerable populations.

Despite these restrictions, we agree with the petitioner that the current regulatory settings are inadequate, and we are concerned that there are insufficient protections in place for vulnerable populations. With this in mind, we recommend that the Government review the regulatory settings around gambling advertising in New Zealand. We also think that this matter deserves the attention of the House. We believe that this would be a suitable topic for a special debate.

Appendix

Committee procedure

The petition was signed by 6,188 people on the Parliament website and on paper. It was presented to the House by Todd Stephenson on 25 March 2025 and referred to us that day. We met between 22 May and 16 October 2025 to consider it. We received written submissions from the petitioner, the Department of Internal Affairs, the Gaming Machine Association of New Zealand, Lotto NZ, and TAB NZ and heard oral evidence from each submitter. We also heard oral evidence from Pasifika community service Mapu Maia. We received advice from the Parliamentary Library.

Committee members

Greg O'Connor (Chairperson)
Kahurangi Carter
Greg Fleming
Paulo Garcia

Dr Hamish Campbell, Benjamin Doyle, and Lemauga Lydia Sosene participated in some of our work on this petition.

Related resources

The documents we received as evidence and advice in relation to this petition are available on [the Parliament website](#).

A recording of our hearing can be accessed online on [the Parliament website](#).