

‘No evidence of harm’ implies no evidence of safety: Framing the lack of causal evidence in gambling advertising research

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Jamie Wheaton: Jamie Wheaton has received funding from GambleAware, and is a member of the Bristol Hub for Gambling Harms Research. He has also received seedcorn funding from the British Academy for conference travel.

Leon Y. Xiao: L.Y.X. is supported by a PhD Fellowship funded by the IT University of Copenhagen (IT-Universitetet i København), which is publicly funded by the Kingdom of Denmark (Kongeriget Danmark). L.Y.X. was employed by LiveMe, then a subsidiary of Cheetah Mobile (NYSE:CMCM), as an in-house counsel intern from July to August 2019 in Beijing, People's Republic of China. L.Y.X. was not involved with the monetisation of video games by Cheetah Mobile or its subsidiaries. L.Y.X. undertook a brief period of voluntary work experience at Wiggin LLP (Solicitors Regulation Authority (SRA) number: 420659) in London, England in August 2022. L.Y.X. has contributed and continues to contribute to research projects that were enabled by data access provided by the video game industry, specifically Unity Technologies (NYSE:U) (October 2022 – Present). L.Y.X. has met and discussed policy, regulation, and enforcement with the Belgian Gaming Commission [Belgische Kansspelcommissie] (June 2022 & February 2023), the Danish Competition and Consumer Authority [Konkurrence- og Forbrugerstyrelsen] (August 2022), the Department for Digital, Culture, Media and Sport (DCMS) and its successor of the UK Government (August 2022 & August 2023), PEGI (Pan-European Game Information) (January & March 2023), a member of the European Parliament (February 2023), the US Federal Trade

Commission (February 2023), the Finnish Gambling Administration at the National Police Board [Poliisihallituksen arpajaishallinto / Polistyrelsens lotteriförvaltning] (March 2023), the Danish Gambling Authority [Spillemyndigheden] (April 2023), the Netherlands Authority for Consumers and Markets [Autoriteit Consument & Markt] (May & June 2023), and the Swedish Gambling Authority [Spelinspektionen] (June 2023). L.Y.X. has been invited to provide advice to the DCMS on the technical working group for loot boxes and the Video Games Research Framework. L.Y.X. was the recipient of two AFSG (Academic Forum for the Study of Gambling) Postgraduate Research Support Grants that were derived from 'regulatory settlements applied for socially responsible purposes' received by the UK Gambling Commission and administered by Gambling Research Exchange Ontario (GREO) (March 2022 & January 2023). L.Y.X. has accepted funding to publish academic papers open access from GREO that was received by the UK Gambling Commission as above (October, November, & December 2022). L.Y.X. has accepted conference travel and attendance grants from the Socio-Legal Studies Association (February 2022 & February 2023); the Current Advances in Gambling Research Conference Organising Committee with support from GREO (February 2022); the International Relations Office of The Jagiellonian University (Uniwersytet Jagielloński), the Polish National Agency for Academic Exchange (NAWA; Narodowa Agencja Wymiany Akademickiej), and the Republic of Poland (Rzeczpospolita Polska) with co-financing from the European Social Fund of the European Commission of the European Union under the Knowledge Education Development Operational Programme (May 2022); the Society for the Study of Addiction (November 2022 & March 2023); and the organisers of the 13th Nordic SNSUS (Stiftelsen Nordiska Sällskapet för Upplysning om Spelberoende; the Nordic Society Foundation for Information about Problem Gambling) Conference, which received gambling industry sponsorship (January 2023). L.Y.X. has received an honorarium from the Center for Ludomani for contributing a parent guide about a mobile game for Tjekspillet.dk, which is funded by the Danish Ministry of Health's gambling addiction pool (Sundhedsministeriets Ludomanipulje) (March 2023). The up-to-date version of L.Y.X.'s conflict of interest statement is available via: <https://sites.google.com/view/leon-xiao/about/conflict-of-interest>.

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Gambling advertising is a common feature in international jurisdictions that have liberalised gambling. In the Anglosphere, countries like Australia, New Zealand, and the UK have experienced extensive gambling advertising over the past decade. This advertising is particularly prominent in relation to professional sports and lottery products. More recently, some Canadian provinces and US states have also witnessed a similar rise in gambling advertising. Several European governments including Belgium, Italy, Netherlands, and Spain have more recently restricted gambling advertising and sponsorship in professional sports. But the UK government did not announce any action on gambling advertising and sponsorship in its 2023 white paper. In September 2023, the UK's Minister for Sport, Gambling, and Civil Society addressed a governmental select committee, stating: 'We have very much gone on the evidence, and *there's little evidence that exposure to advertising alone causes people to enter into gambling harm*' (1). This is consistent with the position of the main UK gambling industry trade body, which frequently states in the media that there is 'no evidence' linking gambling advertising to harm (2).

We are a group of stakeholders writing to say that this is a misleading framing of the underlying evidence base. It would be equally true to say that there is no evidence demonstrating gambling advertising's safety. This supposed lack of causal evidence (a point contested by some academics (3)) is simply an absence of evidence due to methodological difficulties inherent to gambling advertising research. Importantly, there is also no evidence of an absence of an effect. People are exposed to gambling advertising in their daily lives, and yet a majority of the research community lacks access to the gambling operator data which could be used to investigate longitudinal relationships (4). Causality is often best tested for via well-controlled laboratory experiments, and yet no contrived experiment can recreate the experience of being exposed to -- and potentially influenced by -- gambling advertising during one's daily life.

Despite these methodological challenges regarding causality, gambling researchers have assembled a wealth of evidence on other aspects of gambling advertising. Gambling advertising can be highly prevalent, especially around live sport (5,6); features certain distinct types of content, which use a variety of psychological hooks (5,6); and is often perceived poorly by its recipients (5,6). Research has also linked self-reported advertising exposure and gambling (7–9), especially amongst disordered gamblers, and linked the use of wagering inducements to gambling behaviour using data from an online gambling operator (10). Evidence also suggests that the safer gambling messages found in many gambling adverts are unlikely to counteract any potential harms from advertising (11,12). In time, econometric analyses might be run to test for causal reductions in gambling harm from various governmental restrictions on gambling advertising.

Policy decisions regarding gambling advertising should not necessitate evidence of a direct causal link to change the status quo, as those who argue that gambling advertising is safe have not been held to the same evidential standard.

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