

**THE COALITION OF MAJOR PROFESSIONAL AND PARTICIPATION SPORTS  
INCORPORATED**

**SUBMISSION TO COMMERCIAL RADIO AUSTRALIA – DRAFT PROVISIONS OF THE  
COMMERCIAL RADIO AUSTRALIA CODE OF PRACTICE**

**15 DECEMBER 2017**



## INTRODUCTION

COMPPS consists of the following organisations:

- Australian Football League (**AFL**);
- Cricket Australia (**CA**);
- Football Federation Australia (**FFA**);
- National Rugby League (**NRL**);
- Netball Australia (**NA**);
- Rugby Australia (**RA**); and
- Tennis Australia (**TA**).

These sports play a huge role in developing, promoting and presenting sport in Australia from the grass roots through to the international level. They are not-for-profit bodies and are responsible for the long-term development and sustainability of their sports.

Each of these organisations is the governing body and custodian of a major professional sport in Australia. They are mass participation sports - between them, they have over 9 million participants and 16,000 clubs.

COMPPS members provide a wide range of public benefits through a self-funding business model. A large portion of the revenue of COMPPS members is devoted to enhancing, promoting and developing sport for all Australians both at national and 'grassroots' level.

## BACKGROUND

Thank you for providing the opportunity to comment in relation to the new draft provisions of the Commercial Radio Australia Code of Practice (**CRA Code**) relating to the promotion of gambling and betting during live sporting events.

Our comments in relation to the draft gambling provisions in Section 9 of the CRA Code are as follows:

### **Section 9: promotion of gambling and betting odds in live sports coverage**

1. Clause 9.4 – the clause provides examples of Long Form Live Sporting Event (**LFLSE**) sports such as Tennis that have numerous sporting events or games in a tournament, but does not consider multi-day sporting matches such as Cricket's Test Matches, which are conducted over a 5-day period. We seek to amend the drafting of this clause to confirm that for a LFLSE that is conducted over several days, that each day's Play constitutes a separate sporting event. This is consistent with clause 9.6 of the current CRA Code, which provides for 'competition for that day'.
2. Definitions Section – in order to achieve consistency across the Codes, we seek to have:

- i. the definitions of ‘*Play*’ and ‘*Incidental Accompaniment*’ amended to mirror the corresponding definitions in the revised Free TV Code (to incorporate the proposed gambling provisions); and
- ii. in the table contained within the definition of ‘*Scheduled Breaks in Play*’, the reference to T20 Cricket amended to mirror the corresponding table in the ‘*Scheduled Breaks*’ definition the revised Free TV Code (to incorporate the proposed gambling provisions), as follows:

*T20 Cricket Between each Session/change of innings  
Between the conclusion of second innings and Super Overs  
Between Super Overs*

3. Definitions Section

In the table giving examples of Scheduled Breaks in Play we request to have references to “golden point” changed to “extra time” for rugby league games.

For consistency (we have requested that Free TV also make this amendment) we seek to have the definition of ‘Sessions’ amended to include reference to a T20 Cricket Match, as follows:

**Session means:**

...

(a) *In relation to one-day and T20 cricket, each innings;*

....

**General comments**

We are seeking to ensure that the provisions and any safeguards implemented within any of the CRA, ASTRA, Free TV or Online Codes be applied consistently across all platforms including online. To this end we will seek from all relevant organisations:

1. that the provisions and definitions in each of the Free TV, ASTRA, Radio and Online Codes be consistent across all platforms; and
2. to ensure consistency, seek that the definitions of the revised Free TV Code be used, where applicable, as the base of reference in each of the ASTRA, CRA and Online Codes.

Yours sincerely



**Malcolm Speed AO  
Executive Director**