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The Public Interest Approach to Gambling Policy and Research

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ABSTRACT

Evidence-based public policy usually requires proof of causality as its justification. The causes of problems must be identified and proof of the effectiveness of policy measures to alleviate them is a condition for their application. “What works?” is a standard requirement for regulation of problematic lifestyles or consumption. The requirement of causality is often in a strange contradiction with justice. In many lifestyle issues such as excessive eating, gambling, drinking or other behavioural problems causality usually cannot be demonstrated. We do not know, for example, whether poverty is a cause or a consequence of gambling, overconsumption of food, smoking, excessive drinking, substance use or other deleterious consumption patterns. On the other hand, negligence of policy in such lifestyle issues violates our sense of justice and common understandings of public responsibility. The presentation draws on key findings of a collective book on gambling policy and its empirical foundations.

INTRODUCTION

Gambling has been strictly regulated in most societies throughout ages, and still is. Regulation has relied on religious views, on the moral value of work and entrepreneurship, or on social norms concerning acceptable uses of leisure. As it has developed into a global industry of mass consumption, economic and fiscal arguments, crime prevention, and consumer protection have become more important. Prevention of gambling-related harm including addiction and individual financial problems have emerged as grounds for regulation as the activity has become more widespread. (Sulkunen and Babor, forthcoming).

Questions and theories about gambling regulation usually hinge on the notion of causality, like in other areas of research on consumption-related harm. Public health research represents the paradigm of the approach. Cause-specific measures of excess mortality and morbidity depend on complex data sets and sophisticated analysis to determine the link between each disease or lifestyle pattern and loss of healthy life (World Health Organization (2017): WHO Methods and data sources for global burden of disease estimates 2000-2015. Global Health Estimates Technical Paper WHO/HIS/IER/GHE/2017. Department of Information, Evidence and Research, WHO, Geneva).

Causality is also involved in measuring the efficiency of prevention and treatment. The methods include price and availability regulations, licensing and trade restrictions, advertisement control, warning labels, education, and indirect methods to improve living conditions. Treatment, services, and medication are costly, and their effectiveness must be based on evidence.

Evidence on causality may seem to be an obvious requirement to justify public policy. Arbitrary limitations of freedom to choose and to operate on the market are in conflict with ethical and political principles in most societies to some extent, and in liberal societies emphatically so. Policies must be justified and grounded on reasonable evidence, but what counts as such is a matter of contestation from several interested points of view (R. Cassidy et al. 2014 “Fair game? Producing gambling research”. ERC: Goldsmiths).

My argument in this chapter is that the taken-for-granted requirement of causal proof in gambling regulation is inadequate and misleading. Part of the problems are technical and methodological but more important issues concern a matter of principle: what is it that regulation is expected to achieve? Public or common good, and public or common interest, are frequent formulations of these aims. They are often used interchangeably, but in fact they cover underlying principles that are quite different and often contradictory. The following analysis of the different possibilities is based on key findings of a collective book that reviews available research evidence on the justifications and their empirical validity of gambling policies in the world. This article will show that a public interest approach opens a wider agenda of policy justification than conventional notions - such as public health - that singularly depend on evidence of causality. A wide agenda for research and policy evaluation is important, not only because of the diversity of related harm but also because of the complex way in which the burden is distributed in society.

TECHNICAL AND METHODOLOGICAL PROBLEMS WITH THE CAUSALITY REQUIREMENTS

Much work has been devoted in health research to develop standardised criteria of lifestyle-related diseases in the international classifications ICD and DSM. They consist of lists of behavioural symptoms in the past year, with thresholds for a behavioural problem and a pathology. They are needed for diagnostic purposes but they also serve to measure how much of the burden on population health can be attributed to specific risk behaviours such as alcohol and tobacco use, nutritional factors, and now gambling. Similar screening instruments are used in population surveys to measure the prevalence of persons exceeding the thresholds. The problem is that the criteria are not in fact universally applied in clinical practice, and are differently understood in population surveys and other sources. Cultural definitions interfere too much to provide comparable statistics on health risks to justify regulation (Rehm and Room 2017). The same goes for gambling, its different forms and the related problems. The requirement of causal evidence is complicated by a wide scope of non-medical issues that may or may not be associated with gambling (Langham et al. 2016. “Understanding gambling related harm: a proposed definition, conceptual framework and taxonomy of harms”. BMC Public Health 16: 80). Attempts to prove causality either way, from behaviour to problems or vice versa, even with large longitudinal samples and register data, are highly politicized and produce contradicting results. Distributional issues are always involved. The poor suffer more from risk behaviours, and therefore become even more vulnerable, but it is difficult to determine whether low income, health and other conditions are a cause or a consequence of such vicious cycles.

Other problems are more technical, most of them related to sampling and coverage. Gambling problems have low prevalence rates. Researchers usually come up with figures far below five percent of problem gamblers and much less for pathological gamblers in general populations. Population surveys are vulnerable to so many sources of error concerning such low prevalence rates that cross-sectional comparisons between populations

are very shaky, and conclusions on changes in time within the same population are almost useless for policy purposes (Sulkunen, Babor et al, forthcoming).

Policy effects are also very difficult to establish, as many things happen in society simultaneously, and very often strict control policy only follows, rather than causes, behavioural change and attention to problems.

For these reasons research that rests only on causal evidence is an easy target for the industry that has an interest in the way regulation is set up and monitored.

COMMON GOOD - COMMON INTEREST; PUBLIC GOOD - PUBLIC INTEREST

The requirement of causal proof is problematic not only from the methodological and technical point of view. The main difficulty, often passed without further reflection, is buried in loosely explicated notions of what it is that public (health) policy and research actually aim to promote or advance, or to prevent and minimize.

Goods versus rights and interests

Two justifications of social actions are common in policy discourse. One approach rests on the idea of *goods*; others draw on *rights and interests*. Healthy life is a prime example of a good thing that everybody, or most people, consider desirable. On the other hand, health can also be understood as a right, and people have an interest in protecting it. Policy approaches can be and are commonly justified from both perspectives. At first sight, the difference appears to be slight – who would not be interested in good health? In fact, the two perspectives are very different.

The distinction between goods and rights (or interests) opens two different ways of evaluating what are just and fair goals in social policy. Health is a good, and promoting it is acceptable if it does not unduly impinge on another good, such as the freedom to choose one's lifestyle. When these goods are in conflict, as they often are (Sulkunen 2011), we would have to weigh them one against the other.

On the other hand, promoting health serves a variety of interests, such as those of the health industry, patients and patient associations, health professions, and many other people engaged in health promotion or care for the sick. Health can be promoted and defended as a right to and an interest in adequate services and protection against risks, as in health inequality research (World Health Organization (2008). Closing the Gap in a Generation: Health Equity through Action on the Social Determinants of Health. Final Report of the Commission on Social Determinants of Health. WHO,) Geneva). Often rights and interests about health are contradictory, and -- following this perspective -- we need to weigh the legitimacy of one interest or right against others.

Common against particular; public against private

Also the grounds on which the goodness of things and the rights or interests are evaluated oscillate between two possibilities. *First*, they can be assessed in terms of how *common* or how *particular* they are, in other words how widely they are shared in society. Most people value health as a good thing for everybody, but many pleasures, like gambling, smoking, and drinking, have been considered as goods or acceptable for some while not allowed to others. The question is, to what extent policy justifications expect people to conform to similar values about what is good and bad, and for whom.

Second, a distinction between *private and public* goods and interests may be drawn. People have different values, traditions and ways of life, and therefore there are goods that are not

shared by all. Policy justifications need to be limited exclusively to what can be considered public goods, leaving aside – and also undisturbed by public regulation -- those goods that should be considered private. In societies with significant cultural diversity and divergent consumer preferences such a distinction is not only important but necessary to avoid unacceptable authoritarian pressure towards uniformity and sameness.

Both goods and interests (or rights) can be used as policy justifications either on the basis of being common, shared by all or most people, or on the basis of being public. The Table below summarises these four different approaches.

TABLE: Principles of justifying (gambling) regulation

	COMMON	PUBLIC
GOOD	1. Acceptability of gambling: <ul style="list-style-type: none"> • religious • moral • normative <i>Criminalization, prohibition, moral bans.</i>	2. Abstracted goods: <ul style="list-style-type: none"> • health • welfare • security <i>The Ethics of Not taking a Stand, information, persuasion.</i>
INTEREST	3. Collective utility in the long term: <ul style="list-style-type: none"> • health care costs • welfare and security losses • social and economic benefits <i>Cost-benefit analysis.</i>	4. Extended concept of interest: <ul style="list-style-type: none"> • actors and agents • capabilities • processes • intentions <i>Public debate and negotiation.</i>

JUDGEMENTS OF GAMBLING

The fourfold table will next be applied to prevalent justifications of gambling regulation. The first three cells will first be assessed critically; then a further definition of the fourth will follow with a discussion of its implications.

Gambling as "bad"

Many countries consider gambling to violate the common good (Cell 1) even today. Buddhism, Islam, Hinduism and Shintoism discourage or ban most forms of gambling (Warren, 2013). Communist governments, including Maoist China (Lam 2014) and early Soviet Union (Tarasov 2010), have banned gambling for social and ideological reasons (Young and Markham "Coercive commodities and the political economy of involuntary consumption: the case of gambling industries" in *Environment and Planning* 49 (12), 2762-2779).

Even Western democracies have a long history of normative condemnation of gambling itself, not only its consequences. The rising bourgeoisie in the 19th century disapproved gambling as idleness and corruption of the nobility (Reith 2006), and the growing casino

tourism towards the end of the century was limited to border regions, and not accessible to locals, in particular to members of the industrial working class (Parvulesco 2008). Most forms of gambling were made completely illegal in Western Europe and North America in the early 20th century (Orford 2010). Such normative approaches tend to be replaced in contemporary consumer societies by an emphasis on individual and market freedom. In many countries gambling is associated with leisure, tourism, sports, and entertainment. A distinction between good and bad gambling is very difficult to make. Other foundations are called for to justify regulation.

Abstracted public goods

One way to formulate policy targets as public goods that everybody agrees on is to call them by abstract names: health is one of them, welfare and security are others (Cell 2). We all wish to lead a life handicapped as little as possible by disease and by other people's actions. The particular means best suited to individuals and groups could be left to themselves, supported by information and persuasion provided by experts and the public powers. This is a policy approach we have elsewhere called "The Ethics of Not Taking a Stand" (Sulkunen & Rantala 2004, pp. 145-163).

The abstract solution hardly solves the problem. Policy measures must be concrete and binding if they are to be effective. Solid evidence on alcohol policy supports the view that information and persuasion that leave the decision to consumers have low cost-efficiency (Babor et al. 2010). Some similar findings are available on gambling (Williams et al. 2012b; Lemarié 2012). Effective regulatory methods involve limitations of individual freedoms, and thus raise the issue about whose good is a public issue and whose good should remain private. Gambling involves several subjects who suffer from its consequences but are unable to participate in making decisions about it. Even gamblers themselves seldom have sufficient knowledge of their chances to win and lose. Abstract notions of responsible gambling, with voluntary limit setting and prompt messages, respect the individual gamblers' private good, but leave responsibility for the public good abstract and empty of content.

Common interest

Another approach, also with a long history in moral and political theory, is to refer to a *common interest* instead of a common good (Cell 3). We may not agree on the value of gambling, but could still agree that it is in our common interest to minimize it because of the harm it causes to society. This is the logic behind the Total Consumption Model, well known in alcohol policy. It is not necessary to take a stand on the goodness or badness of drinking to agree that less consumption is better for the population. (Sulkunen and Warsell).

However, a consensus can be reached only if research can convince us that less consumption reduces the burden of problems, borne even by those who themselves do not cause them. This is probably one of the reasons why the TCM has fared so badly in policy practice despite its wide acceptance among experts. The relationships between total consumption of alcohol, alcohol-related harm, and policy measures, cannot be observed directly by consumers. This is especially problematic in gambling. The common interest justification of gambling regulation requires evidence on and calculations of costs and benefits that are very complex (Williams et al. 2011b). To use the distinction made by Adams (2016), the collective gains and losses from gambling *profits* must be counted in, together with the

balance of gains and harms from the consumption of gambling *products*. The activity creates investments and jobs, brings in revenue to public bursaries, and is an important source of funding for many legitimate social activities. Some of these elements are familiar from alcohol and tobacco policies, but strong redistributive effects of gambling complicate the assessment of common interests significantly. The economic benefits accrue only in small part to those who spend most money and generate the largest part of the surplus used to fund public services. The industry has what researchers call “cannibalizing” effects that undermine the economic outcomes by replacing other economic activities rather than adding to them. (Marionneau and Nikkinen). All these factors make the common interest approach to gambling policy vulnerable to biases and particular competing interests, and make it practically useless in evaluating policy efficiency.

THE PUBLIC INTEREST APPROACH

If the notions of the *common good* and *common interest* are unsatisfactory, and the division of *public vs private good* is less than ideal to justify gambling regulation, would the notion of a *public interest* fare better? In my opinion it will indeed, but then we must broaden the idea of interest beyond its narrow conventional sense. *Common* interest, as described above, actually refers to little more than aggregated selfishness. We must broaden the perspective in a way that allows us to speak of a *public* interest.

Interest in the happiness and misfortune of others

The issue of interest gained importance and attention in European social thought in the seventeenth and early eighteenth century. Authors took a distance from what they called the “selfish theory”, especially that of Thomas Hobbes. He had assumed that people have different needs and desires, but they share one in common: all want to live. Competition for the means of survival leads them into perpetual conflict and war. The only way to ascertain peace was to agree mutually to give away a part of individuals’ rights to a sovereign ruler.

The “selfish theory” was later transformed into the opposite assumption that pursuing their own private goods and rights people advance also the common interest if left undisturbed by state interference. The institution of the market is sufficient to assure this beneficial outcome.

The vast majority of social scientists today agree that this view is not only unconvincing but also a jaundiced way to understand human motivation and social co-operation.

An alternative understanding of interest includes other people in individuals’ evaluation of their own actions as well as those of others. Adam Smith formulated this view in the following way in the opening paragraph of his *Theory of Moral Sentiments*: “How selfish soever man may be supposed, there are evidently some principles in his nature, which interest him in the fortune of others, and render their happiness necessary to him, though he derives nothing from it except the pleasure of having it....”. (TMS: I.i.1.1.-2., p. 9)

Consequently, when we judge the actions of ourselves or others, we take into account other people’s feelings, and we know that they do likewise when they judge us. Smith used the word “sympathy” to characterize this mutuality of moral sentiments. We are angered when we experience injustice personally, but we also “participate” in the anger of others when we see injustice done to them, and want to retaliate the perpetrator also on their behalf. I call this the *extended concept of interest*, taking into account not only the utilities for each actor, separately or in aggregation, but also the “happiness of others”. Direct observance of what others feel, and expectations of what they think of us, is not perfect but it is sufficient for a shared sense of justice. This sense alone assures co-operation in small societies, where people know each other. They know that if they cheat, or are otherwise subject to negative

judgments, retribution will follow. This is called enlightened self-interest. In contrast, large societies need judiciary systems on rules of conduct, mutual rights, and procedures to guide people to follow the narrow path. To be acceptable and to meet a sense of justice, rules and judgements must account not only for the gravity of an action but also for the fact that people are different, have different resources and intentions, and the consequences of their actions depend on such differences. A murder is more serious than an insult; a theft from a poor child is a more severe act than a similar theft from a rich man. Intended harm causes stronger resentment than an accident.

Amartya Sen (2010 *The Idea of Justice*, Penguin Books) has built his “capabilities approach” on Smith’s principle of sympathy. An act should not be judged on the basis of its estimated causal effects alone. It should be considered also from the point of view of the actors involved, accounting for their different positions, interests, capabilities, and also intentions.

The capabilities approach to justice can be applied to justifications of gambling policy. The role of research is then to evaluate not only the effects of policy but the policy itself, including a critical assessment of its justifications. This approach does not require policymakers to take a stand on gambling itself as a common good (or bad) (Cell 1). But it also avoids the need for definitions and measurements of (abstract) public goods (Cell 2) or common interests (Cell 3), and it does not depend on causal evidence of the policy’s effects on these. Comparisons should be made between different possible courses of action rather than between a policy and an ideal or hypothetical situation. The public interest approach, in this sense, is not limited to recommending actions on assumed or weak causal evidence. It evaluates policies, including decisions of the main actors, accounting for who the actors are, what their capabilities are, what kind of processes these actions are part of, and also critically examines their underlying intentions, explicit or not.

Gambling policy, research, and the public interest

This is important since the social policy relevance of gambling goes far beyond the problem behaviour itself and the individuals who are directly concerned.

Gambling generates a surplus of money, called “rent” by economists and political scientist, over costs of production and normal profits (Krueger, Anne (1974). "The Political Economy of the Rent-Seeking Society". *American Economic Review*. **64** (3): 291–303. [JSTOR 1808883](#).). Private companies, good cause beneficiaries, and states are interested in this surplus, which gives rise to two accelerating mechanisms that we have called Loop One and Loop Two (Figure).

Loop One: public revenue and public cost

Loop Two: dependencies on the "rent"

FIGURE(s) ABOUT HERE More gambling means more public revenue, but also incurs a cost as gambling-related harm increases (Loop One). This may lead public, private, and civil society organizations to demand more funding for treatment and support services to problem gamblers, instead of demanding limits to gambling supply.

Loop Two refers to dependencies and vested interests that emerge as states and other levels of public administration, associations, and other good cause beneficiaries use the rent to

provide public services. Any policy effort to reduce the total money volume of the activity will likely meet resistance for this reason.

Consequently, as we have shown in the collective book referred to above, gambling policy has to observe four complexities that go beyond the individuals more or less directly concerned, but also beyond the abstract public goods and the common interests of the population as a whole:

- The “rent” from gambling benefits disproportionately the wealthy but makes the poor even poorer and the unhappy even unhappier.
- Gambling is even more concentrated in a very small group of heavy users than other forms of risk consumption. A very large part of heavy users are those who can least afford to support the good causes funded from the “rent”. Many heavy gamblers are themselves in need of help and support.
- Gambling consists of various types of activities with differential and well known risk potentials for different types of gamblers.
- Gambling contributes to harm and suffering even when it cannot be identified as causing them. Gambling problems co-occur with many other vulnerabilities, and large numbers of persons who are currently not gambling suffer from it. Policy considerations should recognize these facts independently of the causal role of gambling in them.

In our collective book on gambling policy we summarize these conclusions as follows: *“Redistribution of wealth, concentration of the cost on a very small fragment of the population, and reinforcement of other vulnerabilities make gambling policy an issue of distributive justice.”* (Sulkunen, Babor et al., forthcoming, Chapter 12).

This abstract conclusion needs to be broken down for the purpose of evaluating policies and their justifications. The public interest approach highlights four issues that arise from the Smithian concept of sympathy and the “capabilities approach” Amartya Sen has developed from it: 1) actors and agencies; 2) their capabilities; 3) processes; and also 4) intentions of action. Actors and agencies in different positions are differently equipped with competences and resources, and they have different aspirations that also need to be taken into account. Policies, however well-defined and delimited to specific measures, never occur in isolation; they depend on a web of circumstances and trigger other actions not necessarily controllable by those who initiate them. In so far as the task of research is not simply to measure and observe but also evaluate and critically examine policy justifications, also intentions must be included.

Excessive emphasis on causal evidence has resulted in the following caveats in current gambling policy agendas as well as related research, from the public interest perspective.

Actors and agencies

Gambling policy and research modelled on the public health paradigm is focused on the effects of regulation without much attention to the actors involved. In contrast, the public interest approach takes into consideration the essential fact that gambling has become a global industry with multinational corporations as the source of the supply, while gamblers are more or less isolated individuals. A very small group of them, about five percent of the population or less, spend most of the money, and produce the largest share of the gambling profits. The number of other persons affected by each overspending individual is high, estimates varying from 7 to 15 persons (Kalischuk et al. 2006; Salonen et al. 2014). Also the fluidity among heavy gamblers is high (Slutske et al. 2003), so that problem gambling prevalence at any one moment must be multiplied to account for the number of people who have experienced gambling problems.

A second issue concerns the actors responsible for the regulation. It rests mostly with nation states, where responsibilities and interests are divided between federal, state, regional, and local levels, as well as between different governmental branches. Beneficiary ministries like education, culture, health, and social services are often involved. International regulation is mainly institutionalized in the European Union but there is urgent need for world-wide responses to the rapidly growing global supply of gambling opportunities and marketing.

Third, an essential consideration is the web of good cause beneficiaries that are funded from gambling returns. No detailed studies so far have been published to assess the importance of these funds, but it is known that the most important beneficiaries are sports, culture and education, youth work and specific social and health services. Our estimates indicate that the total of these forms of funding commonly amount to as high as 2 or 3 percent as compared to state budgets. (Sulkunen, Babor et al., forthcoming, Chapter 10).

From the public interest perspective it is not sufficient to sum up the economic benefits and losses in CBA balance tables. Their distribution between different types of actors and agents is essential.

A public interest approach needs to go beyond problem prevalence estimates, to the political economy of gambling: the flows of money from the gamblers and their environment to profits, public revenues and good uses of the gambling returns. Knowledge on gambling as a funding source for these activities, as well as on the division of power in regulatory systems, is indispensable for developing reasonable gambling policies in public interest. This is the least well covered research area in gambling studies.

Capabilities

Problem gambling co-occurs frequently with mental and physical health problems, substance use, smoking, poverty, family problems, suicide risk, and criminal records. Availability of gambling opportunities in the most deprived neighbourhoods (Wardle et al. 2014; Wheeler et al. 2006; Pearce et al. 2008) contributes to the co-occurrence of gambling with other vulnerabilities. Exposure to land-based gambling opportunities is one of the easiest targets that national and regional regulating authorities can control.

Online players tend to be more highly educated and have higher incomes than gamblers who do not play on the internet (Tovar et al. 2013). As gambling online is growing rapidly, and as online technology becomes increasingly integrated with land-based gaming opportunities, this difference is likely to disappear.

Digital technology enables, on the one hand, developers to mix games, hide game features, reinforce false beliefs, and offer availability without limit. This is an issue of consumer protection as well as problem prevention. On the other hand, it also enables efficient early detection and blocking of risk behaviour

Spending limits, warning alerts and limits on the access to money need to be complemented with support services for the problem gamblers. These must include assistance with their economic resources and to improve their risk awareness. These factors depend not only on treatment services but on policies that regulate the provision of gambling opportunities.

From the public interest perspective the key area of research and policy that needs to be developed is regulation and technology that prevents exploitation of ignorance and misperception due to social, cultural and mental vulnerabilities.

Processes

The public interest approach implies that policies and their justifications must be evaluated as a process rather than as stable relationships between regulating, supply, behaviour, and problems. The gambling expansion since the turn of the millennium has become an element in the growth of global inequalities. It needs to be understood as a recent historical phenomenon, and policy development must be framed in this context.

The essential fact is familiar from public health oriented research: the volume of gambling is related to the volume of harm in the population (Grun and McKeigue (2000); Hanson and Rossow 2012). Growth in gambling is strongly cumulative, as the analysis of the two Loops show. When it has happened it is difficult to turn it back, and each additional growth impulse is likely to further accelerate the process. Online gambling is the fastest growing part of the activity globally and especially in countries with high coverage of mobile technology among the population. This leads to intense competition between (nationally) regulated and unregulated (unlicensed supply, usually by international operators) markets. Technological advances muddle the distinctions between gambling and social games, as well as the differences between land-based and online gaming.

One response by operators within the regulated market is to develop games that cover all segments of the consumers and gambling styles, including those that are the most exploitative. Consumer protection and crime prevention are often inferred as justifications for this policy. So far the evidence rather supports the contrary view that more regulated gambling not only increases competition overall but also leads to more illegal activities, of which money laundering and match fixing are the fastest growing forms (Sulkunen, Babor et al, forthcoming).

An alternative approach would aim to set limits to the unregulated markets. Experiences from Sweden, Switzerland, the USA, France, and Norway suggest that online and mobile gambling can be regulated, but this involves a cost.

A public interest approach needs stronger policy effort to stop rather than accelerate the growth of global gambling. More research is required on its impact on global inequalities and on the possibilities to regulate the online market without expanding it.

Intentions

The public interest approach is not offering ready solutions to be applied everywhere the same way. Its most important function is to provide material for critical evaluation and justification of policy options. Expanding the regulated market is often justified as consumer protection and crime prevention, but available evidence does not support the argument. Another justification is the extra money, or rent, to be used for good purposes. These arguments are not unknown in other areas related to public health, such as alcohol policy (Mäkelä, Room, Single and Sulkunen 1981. Alcohol. Society and the State. Addiction Research Foundation, Toronto). The global growth of the gambling industry means, however, that this is not only a side issue of the policy area. The disadvantages of collecting money from gamblers should be compared not with the benefits of funding social activities but with other ways of resourcing them.

More research is required on the distributional effects of growing regulated markets, to assess the validity of good intentions used to justify them.

CONCLUSION, DISCUSSION, AND A RECOMMENDATION

The public interest approach sets its goal and the criteria of evaluating policy in the same way as in public health studies – to promote the health and well-being of the general population. It does not rest on judgments of the activity itself. However, the approach is not limited to its consequences either, in terms of the common interest or the abstract public goods of health, welfare and security. A public interest approach evaluates gambling and gambling policy as concrete processes involving many actors in different positions, with different capabilities, interests and intentions.

Our review of currently available research concludes that gambling not only causes health, welfare and security problems but also transfers wealth from the poor to the rich, and reinforces other vulnerabilities. This makes it an issue of distributive justice. In this article I have pointed out that there are caveats in gambling policy and research agendas. The first is the political economy of gambling. Other caveats include technology and policy to prevent exploitation of ignorance and misperception, thus reinforcing social, cultural and mental vulnerabilities. A further key task for research is to assess critically the validity of good intentions that are used to expand the regulated market. These intentions include, above all, consumer protection and crime prevention as well as the use of the extra profits for public use and good purposes.

The public interest approach widens the perspective on gambling policy from its focus on problem prevalence estimates to policymaking itself. This approach hinges on the extended concept of interest, drawing on Adam Smith's view on sympathy, and on Amartya Sen's capability approach to justice. An issue that needs further discussion concerns the process in which the extended interest becomes public. Adam Smith's theory of social co-operation is founded on a sense of justice, but it does not assume that people agree on the terms of justice in each case. This is a matter of public debate and political decisions. Amartya Sen's capabilities approach requires further that decisions should be evaluated not only in view of interests assumed to be commonly shared in society. Nor should evaluations rely on abstract goods to be protected by public regulation. Judgements should also consider actors and agents in different positions, including their different capabilities, interests and intentions. The public interest approach in policy-making and research cannot offer ready solutions to be applied everywhere the same way; it can only provide material for critical evaluation and justification of policy options, and these are and should be the key elements on its agenda.

A recommendation follows naturally from what has been said above. Research findings consistently show that effective pre-commitment and limit-setting tools are those that are universally applied, mandatory, based on behaviour rather than personality, and implemented with personalized registration across the accessible forms of gambling participation. Also the game features and environment characteristics that involve high risks, attract the most vulnerable gamblers and have strongest redistributive effects are well known. Applying the effective risk minimization tools, and repressing the use of high-intensity games and immersive environments will inevitably cut down heavy use and consequently the volume of commercial gambling. The recommendation is that policymakers and researchers should consider this not only in light of problem prevalence rates but rather seek alternatives with a sensitivity to the happiness and misfortune of gamblers and their families.

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