

s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Friday, 28 July 2023 5:20 PM  
**To:** s22(1)(a)(ii) Rafizadeh, Shervin; s22(1)(a)(ii) s22(1)(a)(ii)  
**Cc:** Sullivan, Pauline; s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii)  
**Subject:** s34(3)

**Attachments:**

PROTECTED, SH:CABINET

Hi all,

s47C

s34(3)

Please let us know any early thoughts.

Regards

s22(1)(a)(ii)

s22(1)(a)(ii)

Director • Broadcasting and Gambling Regulation Section / Media Industry and Sustainability Branch • Online Safety, Media and Platforms Division

s22(1)(a)(ii) [infrastructure.gov.au](https://infrastructure.gov.au)

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GPO Box 594 Canberra, ACT 2601

**Department of Infrastructure, Transport, Regional Development, Communications and the Arts**

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*I would like to acknowledge the traditional custodians of this land on which we meet, work and live.  
 I recognise and respect their continuing connection to the land, waters and communities.  
 I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.*

OFFICIAL

PROTECTED, SH:CABINET

s22(1)(a)(ii)

s22(1)(a)(ii)

**Subject:**

s34(3)

**Attachments:**

PROTECTED, SH:CABINET

FYI

PROTECTED, SH:CABINET

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>

**Sent:** Tuesday, 1 August 2023 11:59 AM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>; Rafizadeh, Shervin

s22(1)(a)(ii) <s22(1)(a)(ii)@MO.communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@MO.communications.gov.au>;

s22(1)(a)(ii) <s22(1)(a)(ii)@MO.communications.gov.au>

**Cc:** Sullivan, Pauline <Pauline.Sullivan@communications.gov.au>; s22(1)(a)(ii)

<s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; s22(1)(a)(ii)

<s22(1)(a)(ii)@infrastructure.gov.au>; Penprase, James <James.Penprase@INFRASTRUCTURE.gov.au>

**Subject:** s34(3)

PROTECTED, SH:CABINET

Hi s22(1)(a)(ii)

As requested, for your discussion s34(3)

Regards

s22(1)(a)(ii)

s22(1)(a)(ii)

Director • Broadcasting and Gambling Regulation Section / Media Industry and Sustainability Branch • Online Safety, Media and Platforms Division

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PROTECTED, SH:CABINET

**From:** s22(1)(a)(ii)

**Sent:** Friday, 28 July 2023 5:20 PM

s22(1)(a)(ii) - duplicate email chain

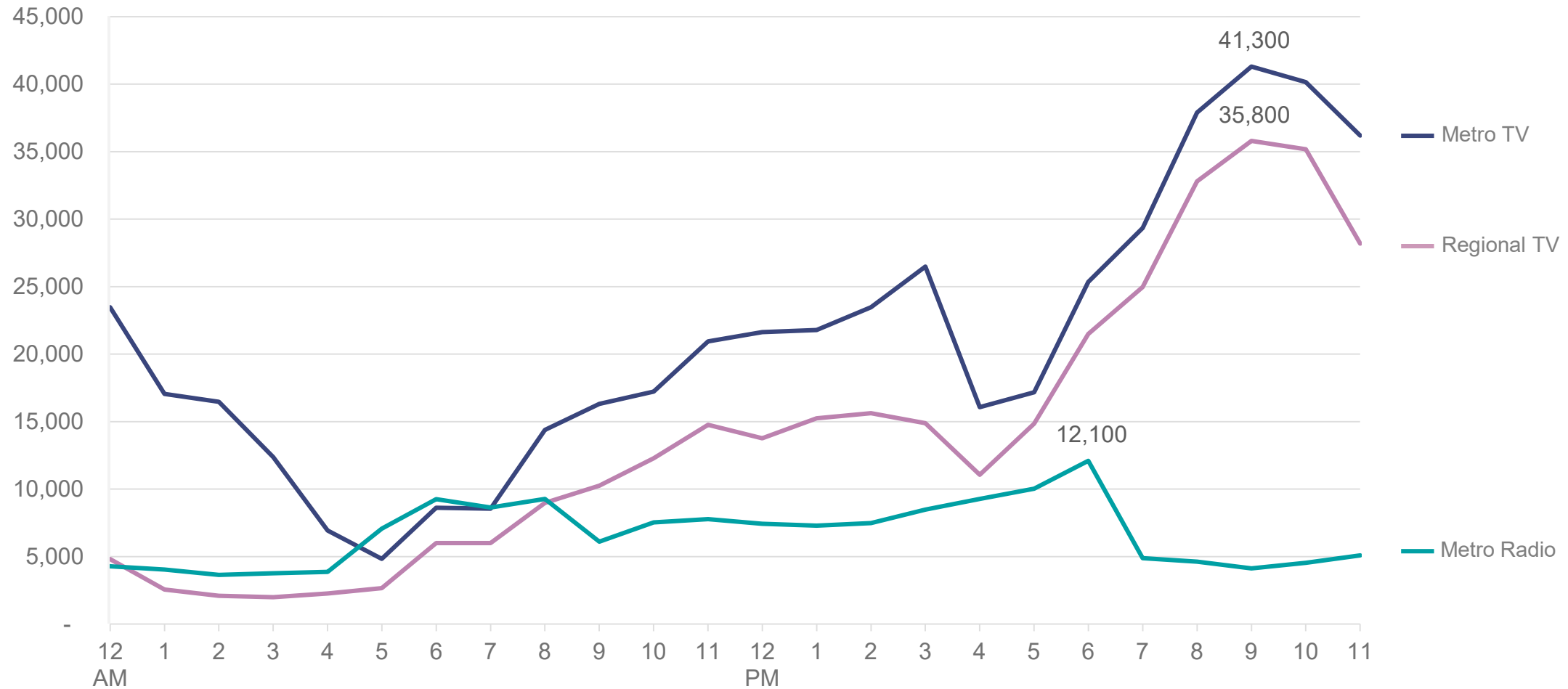


# **Gambling advertising analysis**

## **Nielsen Ad Intel spot data — May 2022 to April 2023**

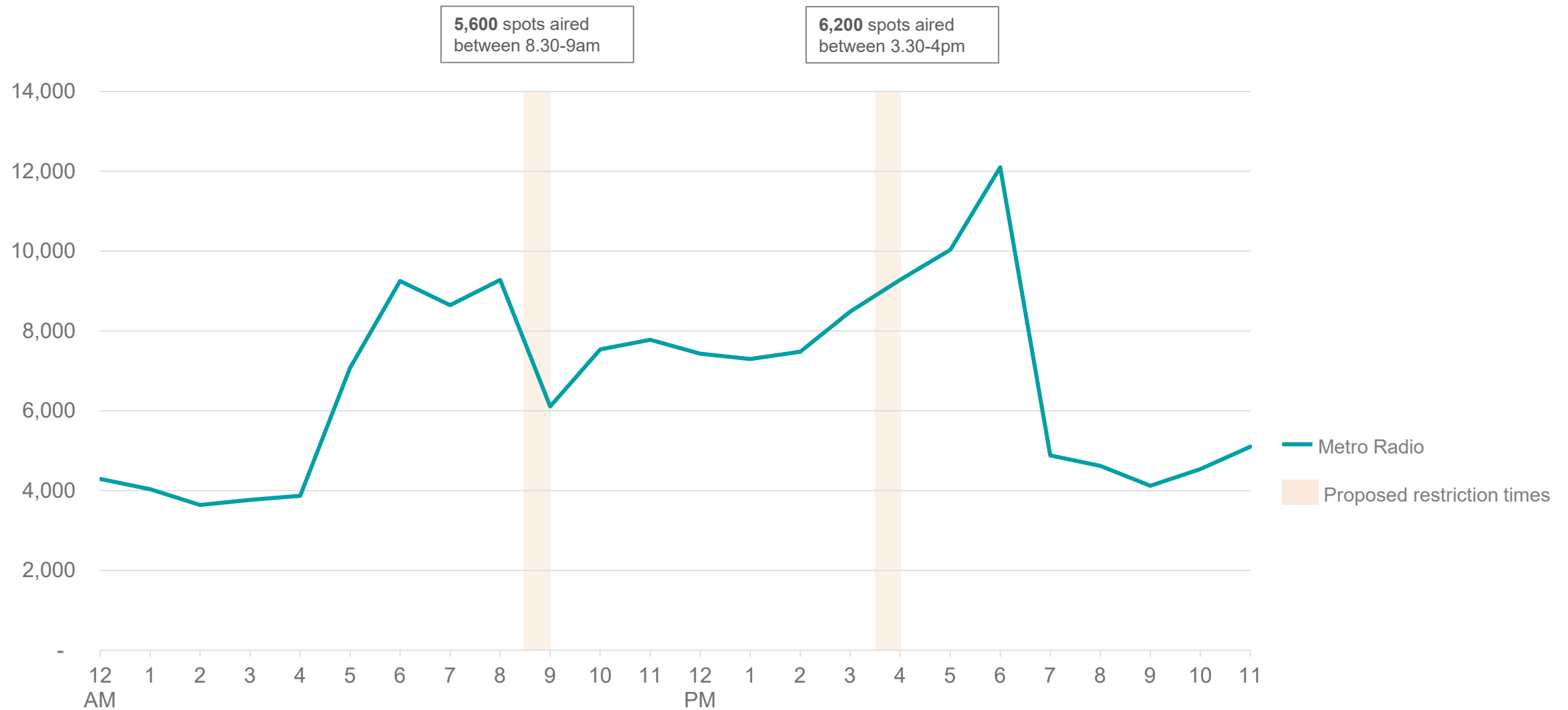


# Chart 1: Total gambling ad spots broadcast, by time of day



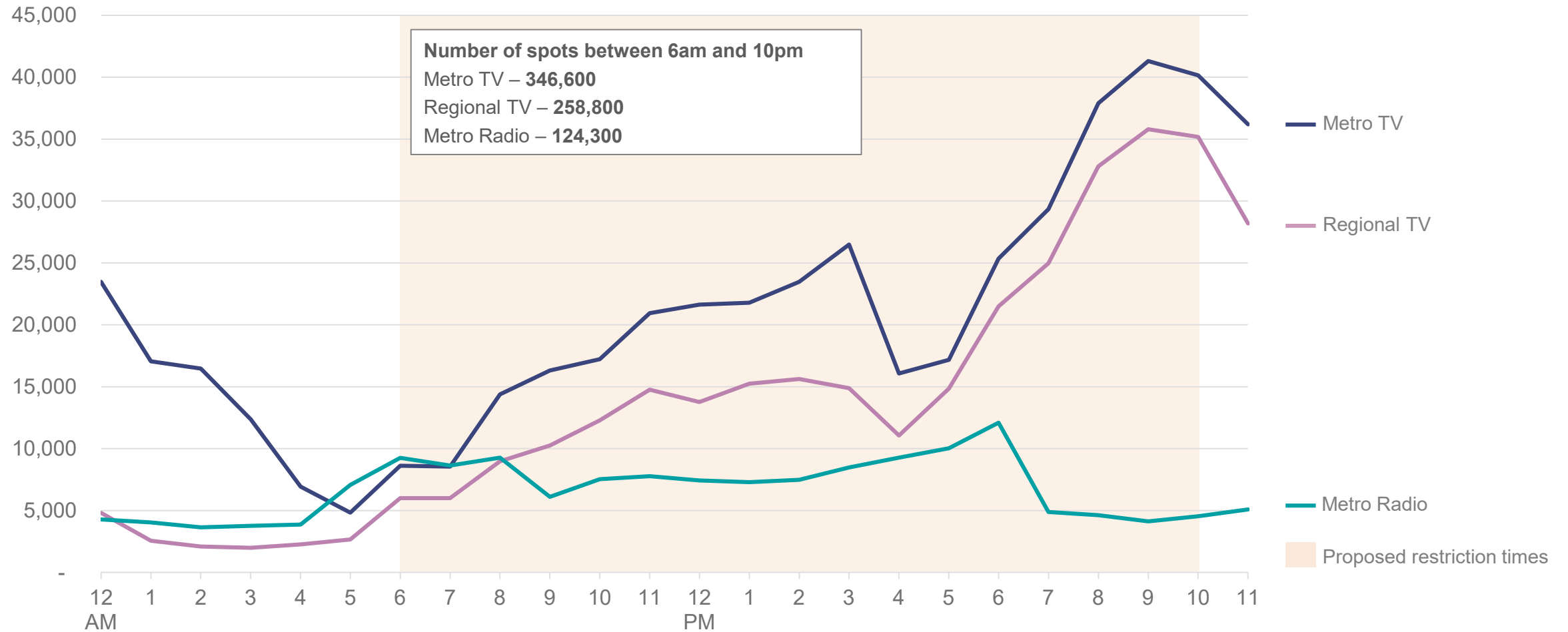
Notes: Over 12 months – May 2022 to April 2023. Figures are rounded to the nearest 100. Metro TV and Regional TV includes commercial FTA channels and markets as defined by Nielsen Ad Intel. Does not include gambling advertising spots on regional radio.

## Chart 2: Gambling ad spots broadcast, by time of day, metro radio (HoR Rec 26)



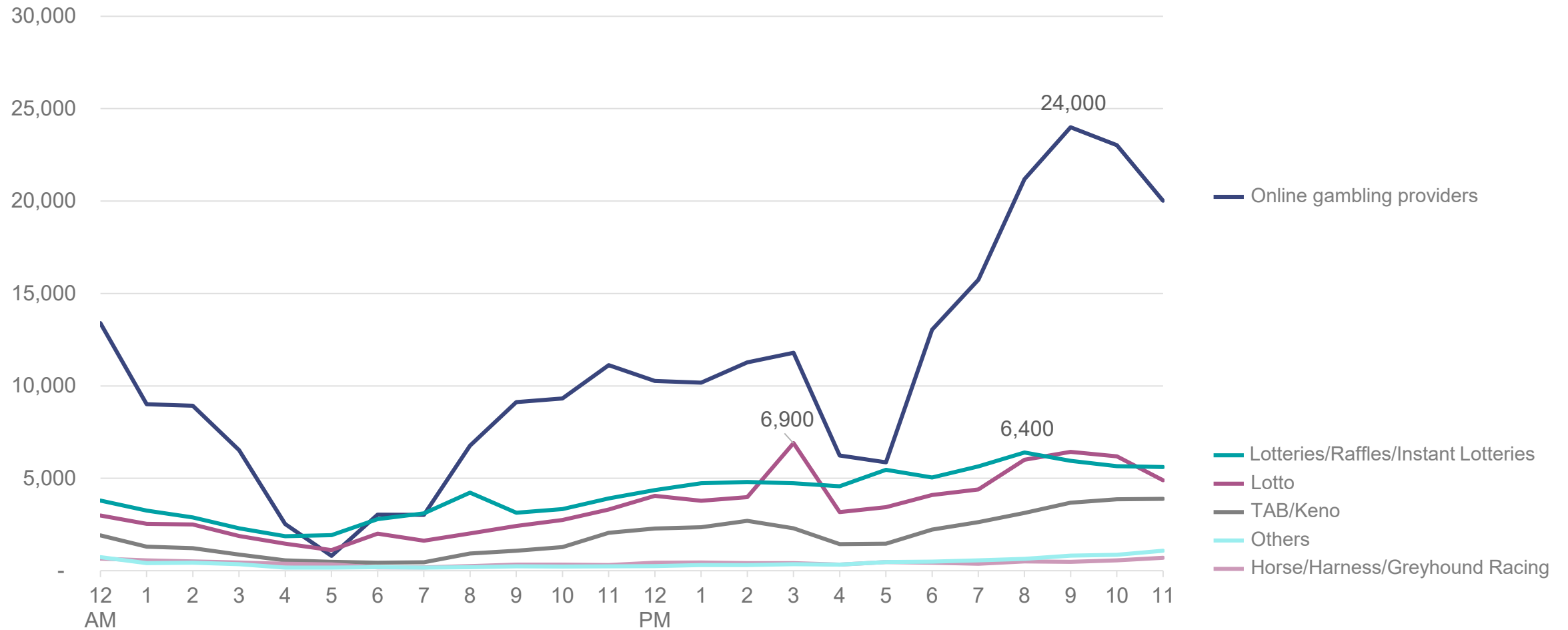
Notes: Over 12 months – May 2022 to April 2023. Figures are rounded to the nearest 100. Shaded time periods indicate the proposed ban on gambling ads on metro radio as per Recommendation 26 in the [HoR gambling inquiry report](#) (Stage 1).

### Chart 3: Total gambling ad spots broadcast, by time of day (HoR Rec 26)



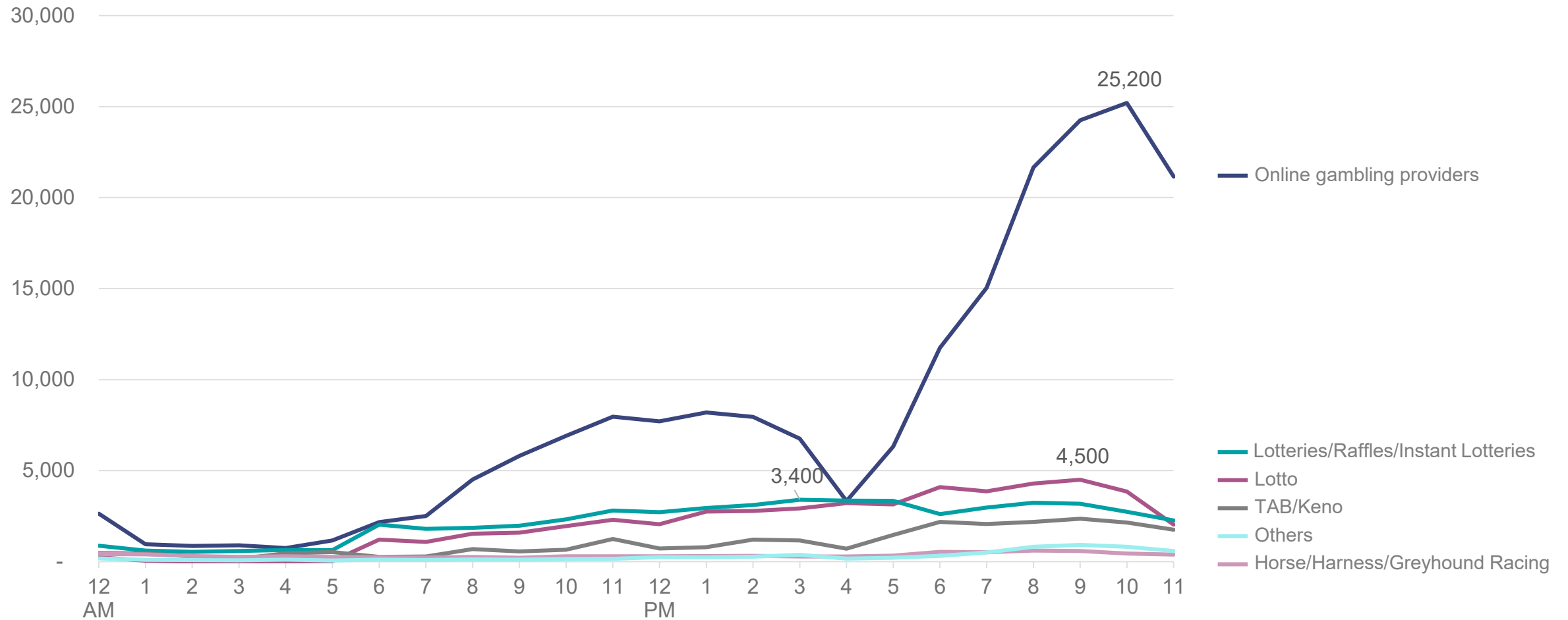
Notes: Over 12 months – May 2022 to April 2023. Figures are rounded to the nearest 100. Metro TV and Regional TV includes commercial FTA channels and markets as defined by Nielsen Ad Intel. Shaded time periods indicate the proposed total ban on broadcasting gambling ads between 6am and 10pm as per Recommendation 26 in the [HoR gambling inquiry report](#) (Stage 3).

# Chart 4: Metro TV gambling ad spots broadcast, by advertiser type and time of day



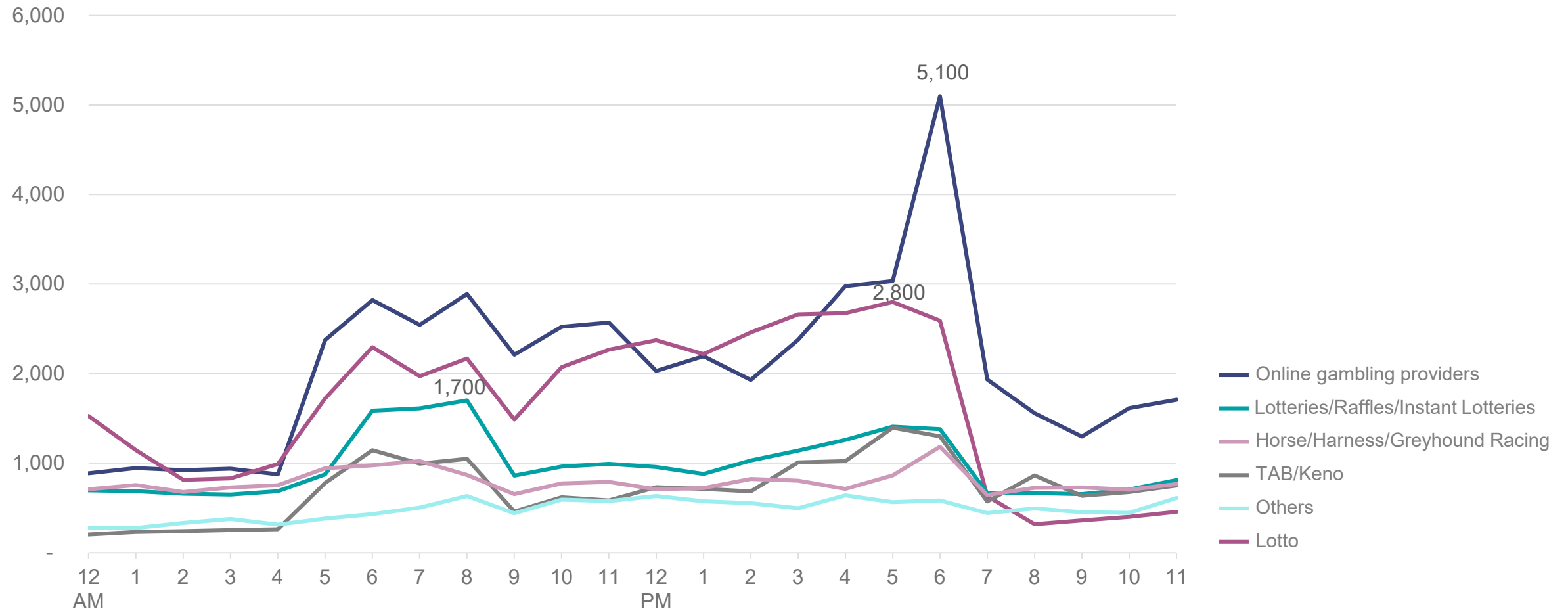
Notes: Over 12 months – May 2022 to April 2023. Figures are rounded to the nearest 100. Metro TV includes commercial FTA channels and markets as defined by Nielsen Ad Intel.

# Chart 5: Regional TV gambling ad spots broadcast, by advertiser type and time of day



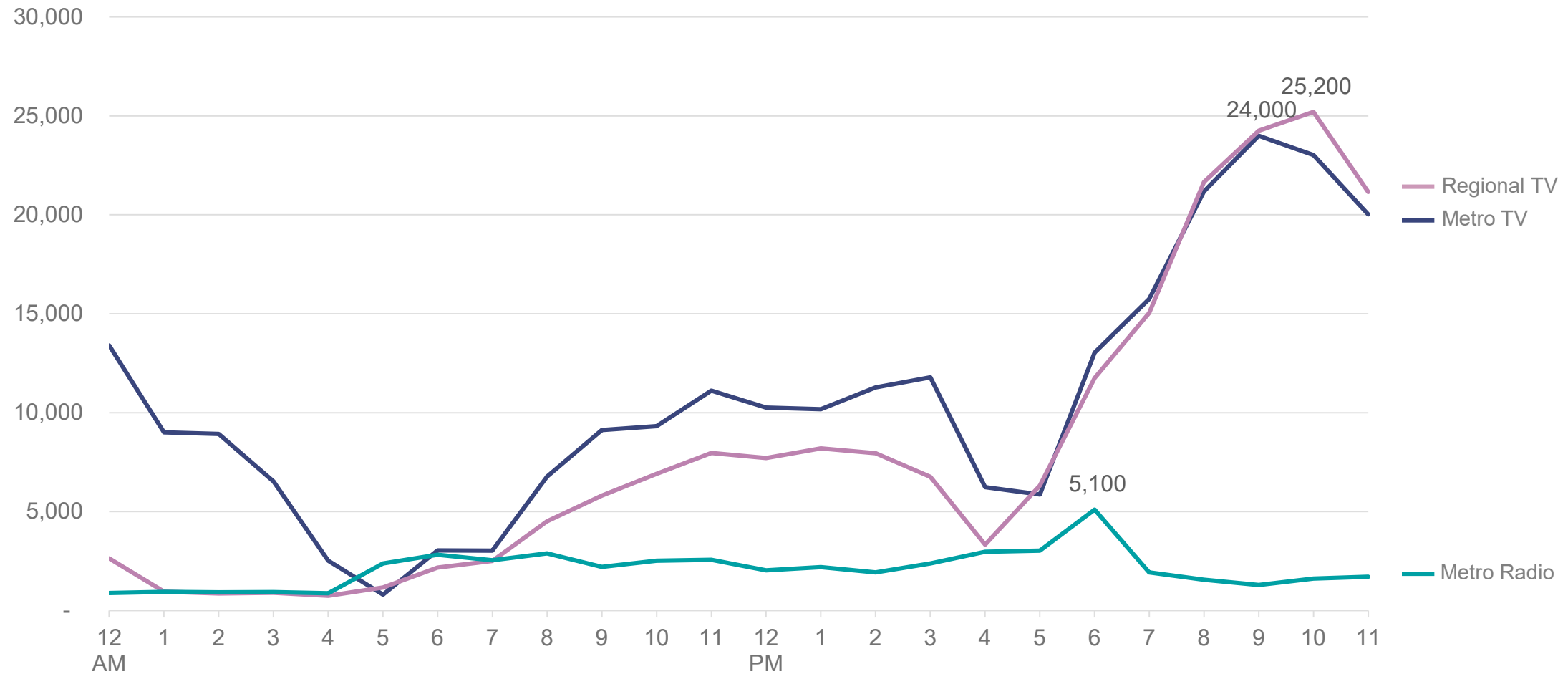
Notes: Over 12 months – May 2022 to April 2023. Figures are rounded to the nearest 100. Regional TV includes commercial FTA channels and markets as defined by Nielsen Ad Intel.

# Chart 6: Metro radio gambling ad spots broadcast, by advertiser type and time of day



Notes: Over 12 months – May 2022 to April 2023. Radio: only includes spots aired in metropolitan markets as defined by Nielsen Ad Intel.

# Chart 7: Online gambling providers ad spots broadcast, by time of day

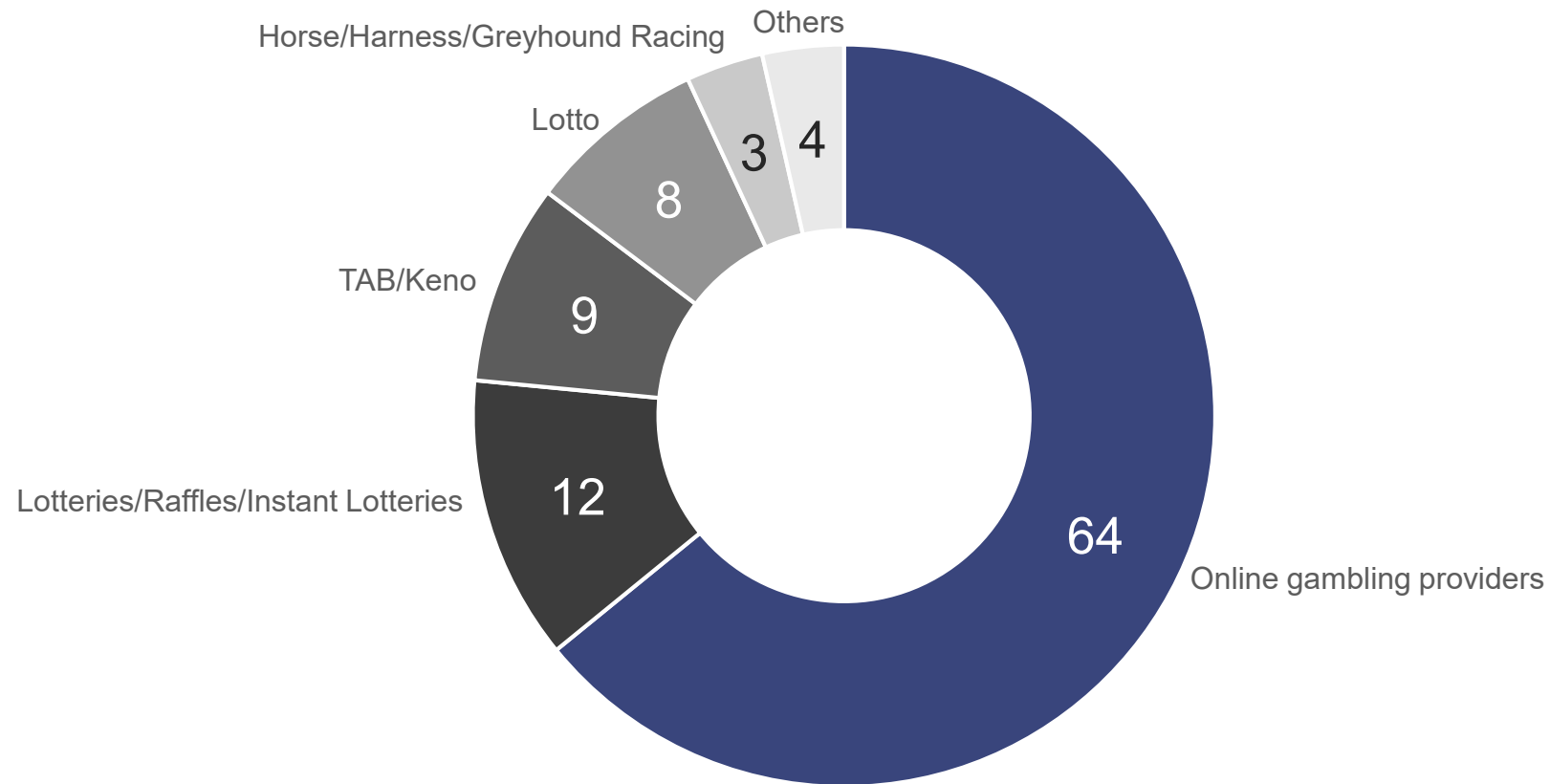


Notes: Over 12 months – May 2022 to April 2023. Only includes the ad spots for online gambling providers (e.g. advertisers promoting gambling services that allow you to bet online or via an app). Figures are rounded to the nearest 100. Metro TV and Regional TV includes commercial FTA channels and markets as defined by Nielsen Ad Intel.





**Chart 9: Share of total gambling ad spend, by advertiser type (%)**



Notes: Over 12 months – May 2022 to April 2023. Includes total advertising spend on metro TV, regional TV, metro radio, general display (website and app) and social media.



[REDACTED]

[REDACTED]

## Glossary

**General display**—are online advertisements such as images, videos or gifs shown to users on websites or apps.

**Lotteries**—Purchasing numbered tickets that are drawn at random to win a prize.

**Lotto**—Games where participants try to match their numbers with numbers pulled out of a draw to win a prize.

**Metro Radio**—includes metropolitan radio markets as defined by Nielsen Ad Intel.

**Metro TV**—includes commercial FTA channels and metropolitan markets as defined by Nielsen Ad Intel.

**Online gambling providers**—refers to advertisers that provide gambling services that allow you to bet online or via an app.

**Regional TV**—includes commercial FTA channels and regional markets as defined by Nielsen Ad Intel.

**Social media**—are online advertisements such as images, videos or gifs shown to users via social media platforms.

**Total gambling advertising**—all gambling advertising commercials, including all sub-categories.

s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Wednesday, 2 August 2023 4:16 PM  
**To:** s22(1)(a)(ii) Rafizadeh, Shervin; s22(1)(a)(ii)  
**Subject:** FW: Seeking advice - priorities for analysis of Nielsen gambling advertising data [SEC=PROTECTED, CAVEAT=SH:CABINET]  
**Attachments:** Gambling advertising - Ad Intel spot data.pptx

PROTECTED, SH:CABINET

See attached ACMA's analysis of the Nielson ad data.

PROTECTED, SH:CABINET

**From:** Cathy Rainsford <Cathy.Rainsford@acma.gov.au>  
**Sent:** Wednesday, 2 August 2023 9:06 AM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)> MO.Communications.gov.au; Sullivan, Pauline <Pauline.Sullivan@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)> infrastructure.gov.au; s22(1)(a)(ii) <s22(1)(a)(ii)> INFRASTRUCTURE.gov.au  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)> @acma.gov.au; Creina Chapman <Creina.Chapman@acma.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)> @acma.gov.au; s22(1)(a)(ii) <s22(1)(a)(ii)> acma.gov.au  
**Subject:** RE: Seeking advice - priorities for analysis of Nielsen gambling advertising data [SEC=OFFICIAL:Sensitive]

**OFFICIAL:Sensitive**

All,

Further to the email below, please find attached a chart pack showing gambling ad spots and expenditure between May 2022 and April 2023, based on the Nielsen Ad Intel data. This is for internal use only (MO, Dept, us) at this time.

These charts are based on what we said we'd produce under 'current ACMA priorities' (see email below). Just as context, some of this analysis is expected to assist with consideration of the HoR inquiry, but important to note that they aren't directly comparable to the ACMA's 2019 research.

Please note, there's still some minor tweaks we're looking to make. This includes clarifying some of the terms used (particularly around genre type), which Nielsen has committed to come back to us on.

Please let us know if you had any questions or would like to discuss.

Regards  
 Cath

**Cathy Rainsford**  
 General Manager Content Division

**Australian Communications and Media Authority**  
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 E [cathy.rainsford@acma.gov.au](mailto:cathy.rainsford@acma.gov.au)  
[www.acma.gov.au](http://www.acma.gov.au)

Executive Assistant: Anna Sergi

T +61 2 6219 s22(1)(a) [@acma.gov.au](mailto:@acma.gov.au)

## OFFICIAL:Sensitive

**From:** Cathy Rainsford <[Cathy.Rainsford@acma.gov.au](mailto:Cathy.Rainsford@acma.gov.au)>

**Sent:** Wednesday, 5 July 2023 5:26 PM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii)> [MO.Communications.gov.au](mailto:MO.Communications.gov.au); Sullivan, Pauline <[Pauline.Sullivan@communications.gov.au](mailto:Pauline.Sullivan@communications.gov.au)>; s22(1)(a)(ii) <s22(1)(a)(ii)> [infrastructure.gov.au](mailto:infrastructure.gov.au); s22(1)(a)(ii) <s22(1)(a)(ii)> [INFRASTRUCTURE.gov.au](mailto:INFRASTRUCTURE.gov.au)

**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)> [@acma.gov.au](mailto:@acma.gov.au); Creina Chapman <[Creina.Chapman@acma.gov.au](mailto:Creina.Chapman@acma.gov.au)>; Rochelle Zurnamer <[Rochelle.Zurnamer@acma.gov.au](mailto:Rochelle.Zurnamer@acma.gov.au)>; Cathy Rainsford <[Cathy.Rainsford@acma.gov.au](mailto:Cathy.Rainsford@acma.gov.au)>

**Subject:** Seeking advice - priorities for analysis of Nielsen gambling advertising data [SEC=OFFICIAL:Sensitive]

## OFFICIAL:Sensitive

Dear s22(1)(a)(ii) Pauline, s22(1)(a)(ii) and s22(1)(a)(ii)

As part of our work on broadcasting industry code reviews, the ACMA recently acquired gambling advertising spot data from Nielsen. This was with the original intent of updating our [2019 research](#) that sought to examine the impacts of the current gambling advertising restrictions in association with the broadcast and streaming of live sports.

We have commenced our analysis of this data and are seeking to provide some initial results within the next 3 weeks. However, following the release of the final report from the HoR Inquiry into Online Gambling, we appreciate that the Nielsen data may also be able to provide additional insights to the Department that could help to inform the Government's response to the Inquiry and ongoing reform considerations concerning gambling advertising. We are happy to prioritise analysis that would most assist in considering the HoR recommendations over our original intent, and are seeking your views on priorities.

Below is a list of research focus areas, based on the Nielsen data, that may be relevant to the Government's current considerations. This includes what we are currently prioritising (which can be actioned relatively quickly from the existing dataset), as well as several additional or more complex areas of examination that may be of value (which could require additional data, greater resourcing or more time for analysis).

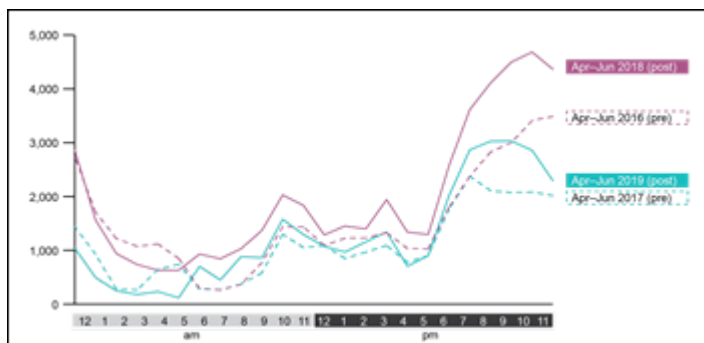
We would like to ensure that we are providing gambling advertising research insights that are of most relevance and value to the Government.

Please note, while we are permitted to share the outputs of this research, we cannot share the underlying datasets. Should the Department wish to undertake its own data analysis, Nielsen has advised that it would be willing to offer the identical data set to the Department for a discounted rate if purchased within three months.

### Current ACMA priorities

#### 1) *Gambling advertising spot counts, based on when they were broadcast (time, day, week)*

- > The Nielsen data allows us to identify and chart the number of gambling ads that were broadcast on commercial TV and radio at certain times of the day, over a 12-month period (April 2022 to March 2023). This was one of the areas of focus in our 2019 research (see example below).  
Metro TV spot count by time of day, 2016-18



- > We could also compare the number of ads across different days, weeks, months, or (using the earlier dataset) select years, showing trends in advertising over time, including when the volume of gambling advertising is at its highest or lowest over a defined period.
- > Spot data could be analysed in aggregate as we did in 2019 (i.e. metro TV + regional TV + metro radio) or broken down into specific market(s) of interest for comparison (e.g. Sydney, Townsville).
- > This type of analysis could be helpful in assessing reform options that relate to a prohibition on advertising between certain times. For example, we could look specifically at the number of ads played on commercial radio during school drop off and pick times, or the total number of ads that are broadcast between 6am and 10pm.
- > A spot count could also be helpful if considering options around new limits on the total number of gambling ads allowed within a period of time (e.g. a broadcaster must not air more than x number of ads per hour). Examining current averages may assist in setting a maximum limit.

#### Out of scope:

- > We do not have gambling advertising data for subscription TV, regional radio, or VAST satellite. Regional data is presented as regional aggregated market groupings, and we may not be able to assess specific smaller towns or localities.
- > We cannot provide any accompanying figures about total audience reach, such as the number of adults or children listening to the radio during school drop off or pick up. We may, however, be able to provide some limited information about the expected adult audience for a gambling ad on metro television, based on the Target Audience Rating Point (TARP).

#### *2) Gambling advertising spot counts, based on advertiser and/or broadcast station*

- > We can identify the total number of gambling ads that were broadcast on commercial TV and radio over a 12-month period by advertiser (i.e. SportsBet), station (i.e. 7Mate Sydney) or group (i.e. Seven West Media).
- > A spot count could also be helpful if considering options around new limits on the maximum number of gambling ads allowed from a certain advertiser or shown on a per station basis. A more granular assessment that combines time and date parameters is also possible (e.g. how many ads from x advertiser were shown by y station during a specified period).

#### *3) Annual gambling advertising expenditure*

- > The Nielsen data provides us with the annual advertising spend, by advertiser, ad sub-category (e.g. lotteries, online, etc) and media type (metro TV, regional TV, metro radio, general display and social) over a 12-month period.
- > Gambling advertising TV expenditure can also be broken down by TV program genre (e.g. how much did gambling advertisers spend to advertise on TV news and current affairs programming).

#### Out of scope:

- > The expenditure data is aggregated for the 12-month period and can't be broken down by other time periods or examined on an ad-by-ad basis.



## Other areas of analyses for consideration

### 4) *Ranking of TV programs by highest volume of gambling advertising*

- > The Nielsen data allows us to examine which TV programs had the highest volume of gambling advertising, however further work would be required to manually review and group parts of the data set (to provide consistent naming conventions).
- > Ranking can be based on the total number of spots, or the most minutes of gambling advertising, over a defined period (12-months by default). We could also distinguish between a single broadcast (e.g. a single episode of a program) or all instances of a program (e.g. all of the episodes in a series).

### 5) *Spot and impressions data for select social media services, online display and video ads (incl. BVOD)*

- > The Nielsen data tracks gambling advertising on selected social media services (Facebook, Instagram, Twitter, YouTube), allowing us to generate spot counts and total impressions by advertiser.

Note: digital impressions count the number of times ads are shown but not unique visitor and therefore cannot be relied upon as a proxy for total reach.

#### Out of scope:

- > We can identify gambling advertising spots on digital, online video and select social media by date and day of week (i.e., when ad was first posted), but not time.
- > We are unable to provide any information on who is being targeted by online ads.
- > We are unable to provide information on gambling ads posted to other social media sites (e.g. TikTok, Snapchat, etc).

### 6) *Gambling advertising spot counts based on advertising sub-category (e.g. comparing online gambling vs lottery advertising)*

- > The Nielsen data allows us to examine the gambling sub-category for the advertised product (e.g. online, horse racing, lottery). This would allow us to test some of the existing assumptions about volume of different types of gambling advertising, and the merits of exempting certain types of gambling advertising from the scope of any new restrictions.
- > If we want to test assumptions around program exemptions (e.g. live horse racing, harness racing and greyhound racing) under the existing rules, we would need to manually identify the exempted programs to compare with live sports where the exemptions apply. A case study approach could be taken instead (e.g. compare gambling ads during Melbourne Cup to NRL grand final).

## Other areas of analyses, requiring additional data acquisition

### 7) *Gambling advertising spot count based on program genre (e.g. TV news programs) or classification*

- > Nielsen can provide us with disaggregated genre data for all listed programs (including news and current affairs), allowing us to do detailed spot assessments by genre, however this was not included in the original cost, and we would need to purchase this additional data.
- > We could manually categorise some program types by genre without acquiring the Nielsen data, however this would be labour intensive, and only recommended if there was an agreed list of programs or clearly defined parameters (such as news bulletins).
- > We may also be able to manually examine gambling display and video ad spots on digital news sites, if this was an area of interest.

#### Out of scope

- > Program data is not available for radio.

### 8) *TV gambling advertising spot count based on beginning and end of live sports broadcast*

- > If there is an interest in maintaining the existing time-based rules before scheduled start of play and after conclusion of play (ie extending to an hour before and after), gambling advertising spots counts based on these parameters may be helpful.

- > The Nielsen data doesn't provide an easy way to identify live sporting events and does not provide the start or end times of broadcasts, making this difficult to assess. Additional analysis could be undertaken to categorise and assess these events, and additional program guide data could be acquired for broadcast start and end times.
- > An alternative option could be to undertake a case study approach, based on a small number of highly popular sporting events (e.g. AFL/NRL grand finals), and examining ads shown before and after these events.

#### Out of scope

- > Some program names in the dataset indicate 'pre' or 'post' game, but this is not consistent. If wanting to systematically assess data based on 'start of play' (rather than start of broadcast), it is unclear where we could source this information from.

#### Limited data / Out-of-scope

##### *9) Evidence to support prohibition of all online gambling inducements and inducement advertising*

- > The Nielsen data does not distinguish between inducement advertising (e.g. providing an offer or bonus for playing) and other forms of gambling ads.
- > Push messages, in-app pop-ups and other direct forms of inducement would likely not be classified as advertising or be caught by third-party data trackers.

##### *10) Evidence to support prohibition on all in-stadia advertising, including logos on players' uniforms*

- > The Nielsen data does not include other forms of gambling advertising, like outdoor advertising or sponsorships with branding opportunities, and we have not made enquiries about whether this is caught in other datasets.

### Examples:

Ad Intel Report : General Display Detailed Report Period : 1/05/2022 - 30/04/2023 Data Types : Impressions Dictionary : Gambling Media : General Display - Video											
Product	Date	Day	Publisher Code	Ad Type	Buy Type	Device Type	Platform Type	Domain	Impression	Size	
Palmerbet.com Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.a.cba.cone.neu.ults	DISPLAY	Programmatic	Mobile	In-App	palmerbet.com	15,117	30x50	
Palmerbet.com Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.a.cba.cone.neu.ults	DISPLAY	Programmatic	Mobile	In-App	palmerbet.com	25,228	30x50	
Palmerbet.com Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.wan.deigrou.nd.andro.id.weath.e	DISPLAY	Programmatic	Mobile	In-App	palmerbet.com	21	160x250	
Pickabet Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.a.cba.cone.neu.ults	DISPLAY	Programmatic	Mobile	In-App	pickabet.com	4,505	30x50	
Pickabet Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.a.cba.cone.neu.ults	DISPLAY	Programmatic	Mobile	In-App	pickabet.com	901	30x50	
Pickabet Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.a.cba.cone.neu.ults	DISPLAY	Programmatic	Mobile	In-App	pickabet.com	5,406	30x50	
Pickabet Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.a.cba.cone.neu.ults	DISPLAY	Programmatic	Mobile	In-App	pickabet.com	5,406	30x50	
Pickabet Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.a.cba.cone.neu.ults	DISPLAY	Programmatic	Mobile	In-App	pickabet.com	4,505	30x50	
Pickabet Betting Svcs-C/L	1/05/2022	Sunday	and roid.com.a.cba.cone.neu.ults	DISPLAY	Programmatic	Mobile	In-App	pickabet.com	4,505	30x50	
Bet MGM Sports Betting C/L	1/05/2022	Sunday	and roid.com.yiro.cam.nfl.stewlers	DISPLAY	Programmatic	Mobile	In-App	pro.mn.pa.beforgn.com	52,389	30x50	
Bet MGM Sports Betting C/L	1/05/2022	Sunday	and roid.com.yiro.cam.nfl.stewlers	DISPLAY	Programmatic	Mobile	In-App	pro.mn.pa.beforgn.com	17,663	30x50	

If there are any detailed questions about the data or analysis, please call s22(1)(a)(ii) in the first instance. s22(1)(a)(ii) can be contacted on 02 6219 s22(1)(a)(ii).

8

**Cathy Rainsford**

General Manager Content &amp; Consumer Division

**Australian Communications and Media Authority**

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E [cathy.rainsford@acma.gov.au](mailto:cathy.rainsford@acma.gov.au)[www.acma.gov.au](http://www.acma.gov.au)

Executive Assistant: Anna Sergi

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E s22(1)(a) @acma.gov.au

**OFFICIAL:Sensitive**

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s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Wednesday, 16 August 2023 8:05 PM  
**To:** s22(1)(a)(ii)  
**Subject:** Fwd: GRNSW supplementary information: 'You win some, you lose more – Online gambling and its impacts on those experiencing gambling harm'

s22(1)(a)(ii)

Begin forwarded message:

**From:** s47F @grnsw.com.au>  
**Date:** 16 August 2023 at 5:43:09 pm AEST  
**To:** "s22(1)(a)(ii) <s22(1)(a)(ii) mo.communications.gov.au>, s22(1)(a)(ii) dss.gov.au  
**Subject:** GRNSW supplementary information: 'You win some, you lose more – Online gambling and its impacts on those experiencing gambling harm'

Dear s22(1)(a)(ii) and s22(1)(a)(ii) – I hope this finds you well.

I just tried to call s22(1)(a)(ii) and learned she's on leave.

You may recall we met virtually on 2 August, and Greyhound Racing NSW (**GRNSW**) undertook to provide you with additional, more specific information on the impact of Recommendations 16 and 26 on the NSW greyhound racing industry.

I wanted to let you know I will provide you with some additional information within the next two days. I also need to manage your expectations on how specifically we can quantify the impact of the Recommendations – i.e. which types of inducements may have a greater impact on GRNSW (Rec 16), and the impact of a prohibition on advertising at specific times of the day (Rec 26).

Please let me know if there are any issues with my proposed timing.

Best regards

s47F

Head of Strategic Projects, Government and Corporate Affairs

Greyhound Racing New South Wales

Level 9 | 10 Barrack Street Sydney NSW 2000

t: s47F e: s47F @grnsw.com.au

website: [www.grnsw.com.au](http://www.grnsw.com.au) and [www.thedogs.com.au](http://www.thedogs.com.au)

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**From:** s22(1)(a)(ii)  
**Sent:** Friday, 18 August 2023 12:29 PM  
**To:** s22(1)(a)(ii)  
**Subject:** FW: GRNSW supplementary information: 'You win some, you lose more – Online gambling and its impacts on those experiencing gambling harm' [SEC=OFFICIAL]  
**Attachments:** 20230817 HoR inquiry into gambling - supplementary information from GRNSW.pdf

OFFICIAL

OFFICIAL

**From:** s47F [REDACTED]@grnsw.com.au>  
**Sent:** Thursday, 17 August 2023 5:59 PM  
**To:** michelle.rowland.mp@aph.gov.au  
**Cc:** s47F [REDACTED]@grnsw.com.au>; s22(1)(a)(ii) [REDACTED] <s22(1)(a)(ii) [REDACTED] MO.Communications.gov.au>; s22(1)(a)(ii) [REDACTED] <s22(1)(a)(ii) [REDACTED] MO.communications.gov.au>; s22(1)(a)(ii) [REDACTED] dss.gov.au  
**Subject:** GRNSW supplementary information: 'You win some, you lose more – Online gambling and its impacts on those experiencing gambling harm'

Dear Minister

Following the virtual meeting on 2 August with your advisers, Greyhound Racing NSW (**GRNSW**) has sought to provide you with additional, more specific information on the impact of Recommendations 16 and 26 of the 'You win some, you lose more – Online gambling and its impacts on those experiencing gambling harm' report on the NSW greyhound racing industry.

Please find our letter **attached** for your attention.

Best regards

s47F

Head of Strategic Projects, Government and Corporate Affairs

Greyhound Racing New South Wales

Level 9 | 10 Barrack Street Sydney NSW 2000

t:s47F | e:s47F @grnsw.com.au

website: [www.grnsw.com.au](http://www.grnsw.com.au) and [www.thedogs.com.au](http://www.thedogs.com.au)

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17 August 2023

The Hon. Michelle Rowland, MP  
Minister for Communications  
PO Box 6022  
House of Representatives  
Parliament House  
Canberra ACT 2600

By email:  
Michelle.Rowland.MP@aph.gov.au

Dear Minister

**Supplementary information for the House of Representatives Standing Committee on Social Policy and Legal Affairs (Committee) inquiry into online gambling and its impacts on problem gamblers**

Further to the meeting on 2 August 2023 with your advisers, I wish to provide supplementary information to support Greyhound Racing NSW's (GRNSW) position, as stated in my letter of 24 July 2023, on the likely significant adverse impacts to the NSW greyhound racing industry as a result of Recommendations 16 and 26 of the Committee's 'You win some, you lose more – Online gambling and its impacts on those experiencing gambling harm' report (**Report**).

GRNSW has sought to analyse and quantify with greater specificity the impacts of various inducements, inducement advertising, and online gambling advertising on the greyhound racing industry. With the extent of information that is available to GRNSW, there is currently a limited capacity to provide a granular breakdown of the analysis, save for the following information.

**GRNSW considers the opportunity for Wagering Services Providers (WSPs) to generate and promote all inducements (i.e. generosity, promotions or bonus bets) should be preserved**

- GRNSW notes 'sign up bonuses' are already banned in NSW under the National Consumer Protection Framework for Online Wagering (NCPF), which places restrictions on "online wagering providers ... offering any credit, voucher, reward or another benefit as an incentive to open an account or to refer another person to open an account".
- Inducements are products that inherently add an innovative dynamic to the greyhound racing industry, which is overall positive to the sport.
- WSPs ought to have the opportunity to offer bona fide customers a range of services for their benefit.



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**A prohibition on any and all online gambling inducements and advertising will have a significantly negative impact on the NSW greyhound racing industry**

- The direct baseline revenue impact (2022 figures) of implementing Recommendations 16 and 26 of the Report on GRNSW is estimated to be ~\$15.9 million due to a reduction in earned race field information use (RFIU) fees, point of consumption tax (POCT) distributions, and direct streaming fees (collectively, Fees).
- To further breakdown the impact on the greyhound racing industry in NSW with respect to Recommendation 16 and 26, a complete ban on inducements will likely cost the industry ~\$12.2 million, and a prohibition on advertising will cost ~\$3.7 million. This does not include future projections of a medium-term reduction in RFIU fees from reduced bet frequency.
  - The abovementioned impact of a prohibition on advertising assumes an inducement ban occurs at the same time. If an advertising ban happened in isolation, the modelling provides that it will cause an equivalent impact to the likely cost of the inducement bans.
- Customers recycle their payouts on average three times. Without any generosity payouts from inducements, this wagering turnover is likely to be lost, thereby RFIU fees and POCT distributions will be negatively impacted.
  - It is estimated approximately 10-20% of total turnover is likely to be lost as the incentive for customers to engage with the product has significantly declined.
  - The impact on total turnover will therefore reduce the total amount of funding to the greyhound racing industry ultimately affecting the sustainability of the industry, track safety and animal welfare outcomes. It also impacts the amount of POCT collected by the NSW Government from WSPs, thereby impacting on the State's finances.
- Granular data on the impact relating to various types of inducements on wagering revenue is unavailable.

**Balance is required in responding to concerns on the volume of advertising for online gambling and exposure of young people and at-risk groups**

- The ability to advertise beyond dedicated racing channels and attract new and existing customers to wager on NSW greyhound racing is appropriate given wagering is a legal pursuit enjoyed responsibly by a vast majority of Australians.
- GRNSW does not seek to advertise to children during children's television programming, however GRNSW acknowledges community and stakeholder sentiment for further reform of gambling advertising.
- Moreover, the broader racing industry and WSPs understand the emerging public sentiment in relation to gambling advertising. Together, Government, the racing industry and WSPs should collaborate on the volume of advertising and exposure of young people and at-risk groups to gambling advertising to ensure the sustainability of these sectors.



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- The wagering revenue impact a prohibition of online gambling advertising would have on the NSW greyhound racing industry at particular times of the day, in accordance with Phases One, Two, and Three of Recommendation 26 is challenging to determine at this point in time. As such, granular quantifiable data is unavailable beyond the information provided in my letter of 24 July 2023.

GRNSW notes and supports many of the recommendations in the Report to improve consumer protections. However, Recommendations 16 and 26 which call for a ban on inducements (i.e. generosity, promotions or bonus bets), and ultimately a complete prohibition on online gambling advertising, are extreme measures.

Recommendations 16 and 26 are thereby very likely to create severe unintended impacts to the viability of the NSW greyhound racing industry and its animal welfare programs, the NSW Government Budget, broadcasters' ability to transmit sporting events for free, economic and employment impacts, and the ongoing viability of sectors that rely on these revenue streams. GRNSW calls upon the Commonwealth Government to seriously consider the implications before contemplating the Recommendations.

Sincerely,  
s47F

**Robert Macaulay**  
**CEO, GRNSW**

Copy: s22(1)(a)(ii) Adviser, Office of the Hon Michelle Rowland MP  
@MO.Communications.gov.au

s22(1)(a)(ii) Adviser, Office of the Hon Michelle Rowland MP  
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s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Friday, 1 September 2023 1:52 PM  
**To:** DLO Rowland  
**Cc:** s22(1)(a)(ii)  
**Subject:** FW: Federal Parliamentary Inquiry into online gambling and its impacts on problem gamblers [SEC=OFFICIAL]  
**Attachments:** inquiry into online gambling and its impacts on problem gamblers.pdf

OFFICIAL

OFFICIAL

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**From:** s47F @gbota.com.au>  
**Sent:** Friday, 1 September 2023 1:45 PM  
**To:** Michelle.RowladMP@aph.gov.au; s22(1)(a)(ii) <s22(1)(a)(ii) MO.Communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii) MO.communications.gov.au>; s22(1)(a)(ii) dss.gov.au  
**Subject:** Federal Parliamentary Inquiry into online gambling and its impacts on problem gamblers

Dear Minister,

Please find attached a submission into Federal Parliamentary Inquiry into online gambling and its impacts on problem gamblers on behalf of the New South Wales Greyhound Breeders, Owners and Trainers Association for your consideration.

Yours Sincerely

s47F

s47F

**Interim Chief Executive Officer**

NSW Greyhound Breeders, Owners and Trainers' Association – Wentworth Park

Suite 3, Level 2 Wentworth Park Sporting Complex Grandstand

Wattle Street, ULTIMO NSW 2037

PO Box 485, Glebe NSW 2037

D: 02 s47F M: s47F

website: [www.gbota.com.au](http://www.gbota.com.au), [www.wentworthpark.com.au](http://www.wentworthpark.com.au)



## The NSW Greyhound Breeders, Owners & Trainers' Association



ACN 000 043 756  
ABN 68 000 043 756

*Registered Office:*  
Suite 3, Level 2  
Wentworth Park Sporting Complex  
Wentworth Park Road,  
Glebe 2037

*All Correspondence to:*  
PO BOX 485  
Glebe 2037

Telephone: (02) 9649 7166  
Email: [meeting@gbota.com.au](mailto:meeting@gbota.com.au)

30 August 2023  
The Hon. Michelle Rowland, MP  
Minister for Communications  
PO Box 6022  
House of Representatives  
Parliament House  
Canberra ACT 2600

By email:  
[Michelle.Rowland.MP@aph.gov.au](mailto:Michelle.Rowland.MP@aph.gov.au)

Dear Minister

### **Federal Parliamentary inquiry into online gambling and its impacts on problem gamblers**

The NSW Greyhound Breeders, Owners and Trainers Association (GBOTA) is a member organisation formed in 1939 and continues to provide services to its membership and participants in the greyhound racing industry. These services include provision of commercial racing, animal welfare and advocacy in the interests of its membership and the wider greyhound racing community.

The NSW GBOTA operates greyhound race meetings throughout NSW, including at the State's premier greyhound track Wentworth Park, the sole metropolitan racing venue in NSW. Additional racing venues across NSW include Bulli, Gosford, Maitland, Gunnedah and Temora. Appin Way is also utilised as a training facility and racing operations were formerly conducted at Lismore and Bathurst prior to regional flooding. In addition, the NSW GBOTA operates a network of branches throughout NSW (20 in total) providing greyhound racing participants with the opportunity to meet monthly and progress issues of significance and welfare to the industry and discuss their ongoing participation.

The Association reinforces what the NSW greyhound racing industry has already developed through the NSW Greyhound Welfare Code of Practice, regulated by the Greyhound Welfare & Integrity Commission (GWIC), which sets very high standards for the keeping, treatment, handling and care of greyhounds. It includes detailed standards regarding the facilities, equipment and conditions at the premises where greyhounds are kept, trained and raced.

I wish to highlight the potential consequences to the NSW greyhound racing industry arising from the recommendations delivered by the House of Representatives Standing Committee on Social Policy and Legal Affairs (Committee) inquiry into online gambling and its impacts on problem gamblers. On 28 June 2023, the Committee delivered its report 'You win some, you lose more - Online gambling and its impacts on those experiencing gambling harm' (Report).

The Report contains 31 recommendations, two of which are of particular concern to NSW GBOTA, which have the potential to materially impact the ongoing sustainability and viability of the NSW racing industry, notably:

- A ban on all inducements alone is likely to impact wagering turnover by 20% to 30%
- When all Wagering Services Providers (WSPs) are considered, the likely dollar impact of a ban on all inducements translates to more than \$90 million on the NSW industry in the first year,

and greater than \$135 million per annum in the fifth year of operation

- The NSW GBOTA is almost wholly supported by Greyhound Racing New South Wales which is funded principally from wagering industry turnover. Given Point of Consumption Tax (POCT) and Race Field Information Use fee models are generally turnover related, the impact on industry funding is likely to be severe.
- The NSW GBOTA's major sponsor is Ladbrokes, with changes there is a likelihood of a reduced sponsorship agreement.
- Animal welfare outcomes may be impacted given the programs are funded from wagering revenue
- NSW jobs, noting 3 of our Greyhound Racing Tracks are located in regional NSW.

A negative impact on industry wagering revenue affects the amount of tax revenue collected by the state, which will almost certainly impact the NSW Government budget.

Recommendations 16 and 26 are of significant concern to the NSW racing industry

#### *Recommendation 16*

*4.142 The Committee recommends that the Australian Government prohibit all online gambling inducements and inducement advertising, and that it do so without delay.*

#### *Recommendation 26*

*5.148 The Committee recommends the Australian Government, with the cooperation of the states and territories, implement a comprehensive ban on all forms of advertising for online gambling, to be introduced in four phases, over three years, commencing immediately:*

*Phase One: prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms. Removal of the exemption for advertising online gambling during news and current affairs broadcasts. Prohibition of advertising online gambling on commercial radio between 8.30-9.00am and 3.30-4.00pm [school drop off and pick up].*

*Phase Two: prohibition of all online gambling advertising and commentary on odds, during and an hour either side of a sports broadcast. Prohibition on all in-stadia advertising, including logos on players' uniforms.*

*Phase Three: prohibition of all broadcast online gambling advertising between the hours of 6.00am and 10.00pm.*

*Phase Four: by the end of year three, prohibition on all online gambling advertising and sponsorship.*

*5.149 Gambling advertising on dedicated racing channels and programming should be exempt from the ban*

*5.150 Small community radio broadcasters should be exempt from further restrictions until December 2025*

GRNSW funding sources principally rely on wagering turnover

Greyhound racing in NSW has four primary sources of funding:

- a) Race Field Information Use fee income;

- b) TAB-derived revenue distributed via the Racing Distribution Agreement and in accordance with the Inter-code Deed;
- c) Tax harmonisation distributions; and
- d) Modest non-wagering revenue, such as sponsorship-driven revenue.

POCT charged on wagering revenue is wholly passed through from GRNSW to the Greyhound Welfare and Integrity Commission (GWIC).

Proposal to prohibit all online gambling inducements and inducement advertising has a sizable impact on the national racing industry.

WSPs have analysed and modelled the impact of Recommendation 16. The following figures have been modelled by Entain and were provided to GRNSW on 18 July 2023.

GRNSW understands an immediate ban on inducements would lead to an approximately 33% reduction in racing and sport turnover from the two largest WSPs, Entain and Sportbet combined. Entain and Sportsbet represent approximately 61% of the national digital wagering market.

Completely prohibiting all advertising is an excessive measure that could significantly and negatively affect the racing industry in the long run. Since racing relies heavily on wagering to sustain itself, any decrease in advertising should be carefully implemented, making sure to exempt racing-related content on media platforms, club sponsorships, on- course signage, and activation.

There are unintended consequences for animal welfare

GRNSW is funded principally from wagering industry turnover, and it invests significantly in rehoming, animal welfare and education initiatives.

GWIC is funded from:

- a) an annual contribution from GRNSW equivalent to its distribution of POCT industry funding, and
- b) an allocation of a portion of POCT revenue to GWIC, subject to the NSW Government's annual Budget process.

It follows that an impact on industry turnover will not only reduce the total amount of funding to the greyhound racing industry, but also the amount of POCT collected by the NSW Government from WSPs, thereby impacting on the State's finances and potentially animal welfare outcomes.

The Regional NSW economy will be significantly impacted by the proposed recommendations. A report on the size and scope of the NSW greyhound racing industry, commissioned by GRNSW, was delivered by consultants IER, dated March 2023. The report identified the NSW greyhound racing industry provided \$655 million in value added contribution to the NSW economy in the 2021-22 financial year. Moreover, there are 12,335 roles in the NSW greyhound racing industry (incl employees, participants and volunteers) with 2,031 direct full-time employees (FTE's). This figure swells to 4,344 total FTE's when considering flow on employment impacts. Significantly, 93.6% of roles are occupied in regional NSW. Any impacts to racing industry funding will have flow on consequences for the NSW economy and jobs, particularly in regional areas.

Recommendations 16 and 26 put the NSW racing industry, animal welfare programs, and NSW Budget at risk. I respectfully urge you to carefully consider the consequences of the Report's recommendations. Moreover, it is vital for the Commonwealth Treasury, NSW Treasury and Revenue NSW to model, verify and communicate the likely consequences of the proposed recommendations to the NSW Budget and NSW racing industry to the Commonwealth and NSW Governments.

The NSW GBOTA believe any decisions regarding inducements and advertising must consider the long-term viability and impact on the greyhound racing industry, and more broadly, the Australian racing industry.

Your Sincerely

s47F



Interim Chief Executive Officer

s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Monday, 4 September 2023 4:33 PM  
**To:** s22(1)(a)(ii) s22(1)(a)(ii) Sullivan, Pauline  
**Subject:** FW: Google slides [SEC=OFFICIAL]  
**Attachments:** Copy of Responsible Gambling Playbook - Minister Rowland staffers.pdf

OFFICIAL

OFFICIAL

**From:** s47F @google.com>  
**Sent:** Wednesday, 12 July 2023 12:47 PM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii) MO.communications.gov.au>  
**Subject:** Google slides

See attached!



s47F  
Government Affairs and Public Policy  
s47F @google.com  
02 s47F



# Google

Responsible Gambling AU

**Playbook**

2023

er the FOI Act 1982 by the Minister for Co



**CEO Google**

*—Sundar Pichai*

“ *The right moral compass is trying hard to think about what our customers want* ”

The playbook is broken down into three sections:

1. *Advertiser Controls - What controls are available to you within Google Ads*
2. *Google Controls - What controls Google implement from our side*
3. *User Controls - What controls users have regarding ad serving*

## Contents

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### 1. [Advertiser Controls](#)

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### 2. [Google Controls](#)

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### 3. [User Controls](#)

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# Section One - Advertiser Controls

# Search Controls

# Negative Keywords

Negative keywords let you exclude search terms from your campaigns and help you focus on only the keywords that matter to your customers. Better targeting can put your ad in front of interested users and increase your return on investment (ROI).

This portion of the playbook explains how to add negative keywords to campaigns. If you're interested in finding out more about how negative keywords work, [you can visit this article](#).



# YouTube Controls

# Content Controls - Overview

## YouTube's Brand Suitability Tools

This overview provides an overview of content exclusion settings for Video campaigns.

Content exclusion settings let you opt out of showing your Video campaigns alongside content that may not be appropriate for your brand or serve your advertising goals.

The playbook will detail more information on each of the exclusion setting types. To understand how to implement these settings, [please visit this article](#).

<b>Inventory Modes</b>	Primary tool for content exclusions. It raises the bar on what is suitable for most brands, while allowing you to choose a level of suitability that is right for your brand.
<b>Digital Content Labels</b>	Digital content labels classify videos into ratings, like DV-G, DV-PG & DV-T.
<b>Topic Controls</b>	You can also opt-out of certain topics like cars and music to keep your ads off videos whose themes aren't relevant to your brand.
<b>Keyword &amp; Placements Controls</b>	You can opt-out of terms, channels or video IDs so your ads won't appear when a user searches or the term matches the video's title or description.
<b>Content Type Controls</b>	These controls allow you to opt-out of placements on livestreams and in-game video.



# Inventory Modes - Overview

Advertisers benefit from a higher baseline as default, and can switch modes based on suitability needs

Inventory Modes allow brands to opt into one of three inventory modes. Each setting offering a gradient of sexually suggestiveness & profanity at the expense or gain of inventory availability.

With this launch we also raised the bar on what is 'Standard' inventory and removed all shocking, sensational, terror & conflict content from all modes.

See our [comparison table](#) for more details on what content is included in each mode.

Expanded inventory	Standard inventory	Limited inventory
<p>Maximize available inventory by showing ads on some sensitive content</p> <p>Excludes extremely sensitive content, for example:</p> <ul style="list-style-type: none"> <li>Excessive profanity</li> <li>Graphic sexual content and nudity</li> <li>Graphic violence and serious injury</li> </ul>	<p>Recommended</p> <p>Show ads on content that's appropriate for most brands</p> <p>Same exclusions as Expanded, and also excludes, for example:</p> <ul style="list-style-type: none"> <li>Repeated strong profanity</li> <li>Strong sexual content and discussions of sex</li> <li>Violence either real or dramatized</li> </ul>	<p>Exclude most types of sensitive content and limit your available inventory</p> <p>Same exclusions as Expanded and Standard, and also excludes, for example:</p> <ul style="list-style-type: none"> <li>Moderate profanity</li> <li>Moderate sexually suggestive content</li> </ul>

COMPARE INVENTORY TYPES

# Digital Content Labels - Overview

Advertisers can control the maturity of the content they appear against or the audience to whom they're marketing

Digital Content Labels classify videos into ratings, like G, PG & T. These are the broadest tools for aligning your campaign with the right content.

YouTube uses a variety of signals – including audio-visual content, associated text or images and metadata – to determine which content label to apply.

Labels	Description
DL-G	Content suitable for <b>general audiences</b> .
DL-PG	Content suitable for <b>most audiences</b> with parental guidance. May contain some mature content.
DL-T	Content suitable for <b>teen and older audiences</b> . May contain frequent mature content.
DL-MA	Content suitable only for <b>mature audiences</b> . May contain excessive mature content. <i>Does not include pornographic content.</i>
Unrated / Not yet Labeled	Content that has not yet been labeled.

# Topic Controls - Overview

Advertisers can control the content topics which their ads appear against

Just as you can target videos about certain subjects – like Arts and Entertainment – you can also opt-out by topic to keep your ads off videos whose themes aren't relevant to or do not align well with your brand.

There are over 60 categories and 1500 subcategories that you can choose to opt-in to or opt-out of for your targeting

Note for Reservation buyers: Topic controls are available and may make sense for audience or broad content buys.

(Politics and religion topics are opted out on reservation campaigns by default)

TOPICS

EXCLUSIONS

Add topics

Choose topics to show ads on content related to a certain subject

Search by word, phrase, or URL

None selected

☐ Arts & Entertainment

▼

☐ Autos & Vehicles

▼

☐ Beauty & Fitness

▼

☐ Books & Literature

▼

☐ Business & Industrial

▼

☐ Computers & Electronics

▼

☐ Finance

▼

☐ Food & Drink

▼

☐ Games

▼

☐ Health

▼

Your ad will show to all topics that match your other targeting. Add specific topics to narrow your targeting.

SAVE

CANCEL

# Keyword Controls - Overview

Advertisers can control their campaigns from running on content related to particular keywords

Keyword controls are the narrowest way to control where your ads appear. When you add negative keywords to your campaign, your ads will not appear near videos whose title or description contains any of the negatives you've added.

Ads will never show on content depicting sensitive events or terrorism, full nudity, sexual abuse, or excessive profanity. There is no need to use keywords to avoid this content.

Overview Enabled Status: Eligible Type: In-stream Max. CPV: \$1.00

Recommendations

DISPLAY/VIDEO KEYWORDS **NEGATIVE KEYWORDS**

Add negative keywords

☒ Add negative keywords or create new list ☐ Use negative keyword list

Negative keywords can prevent your ad from showing to people who search for or browse content related to those words

Add to Ad group Ad Group 1

Negative keywords

Enter or paste your negative keywords, one per line

SAVE CANCEL

# Placement Controls - Overview

Advertisers can control their campaigns from running on specific videos

You can control placements – websites, channels and videos – on which you don't want any ads within a specific campaign or ad group to run. You can also implement placement controls at the account level, meaning the controls will apply to all YouTube and Display campaigns.

Note for Reservation and Google Preferred buyers:

Video controls are not available. Only channel controls are available for reservation buys.

Channel controls are limited in number for both reservation and Google Preferred buys. Please contact your Google team for more details.

PLACEMENTS

WHERE ADS SHOWN

EXCLUSIONS

Exclude placements

Exclude placements on Display Network and YouTube

☒ Add placement exclusion ☐ Use placement exclusion list

Exclude from  
Campaign ▼ TestDemoVideo01-012418

Search by word, phrase, URL, or video ID Q

YouTube channels >

YouTube videos >

Websites >

Apps >

App categories (141) >

Enter multiple placements +

None selected

SAVE

CANCEL

Google

Advertiser Controls

# Implementing your brand control settings in Google Ads

Reservation buyers should consult with their Google team

You can set up brand controls during campaign creation by clicking on Content Exclusions within the Settings tab.

Select any of the drop down arrows to edit inventory type, content types or digital content labels.

# App Campaigns Controls

# App Campaign Controls

App campaigns lean on the protections associated with each sub-channel

You can also exclude placements where you don't want your ads to show. This means you can exclude websites or domains that are inappropriate for your brand or are ineffective in promoting the sale of your products or services.

You can control which publishers or types of content your ads appear on using:

- Topics
- Device targeting: computer, tablet, mobile
- App category
- Individual app exclusions via placement exclusions for mobile apps, and individual website exclusion
- Content exclusions

[Learn more about app exclusions here](#)

**ACCOUNT SETTINGS**

**Content exclusions** Opt out of showing your ads on content that doesn't fit your brand

By default, all video campaigns filter out the most inappropriate or graphic content from all sensitive content categories and content labels. You can customize the filter in the Content exclusions page of campaign settings.

Digital content labels	Sensitive content	Content type
<input type="checkbox"/> DL-G: General audiences	<input checked="" type="checkbox"/> Tragedy and conflict	<input type="checkbox"/> Games
<input type="checkbox"/> Content suitable for families	<input checked="" type="checkbox"/> Sensitive social issues	<input checked="" type="checkbox"/> Live streaming video
<input type="checkbox"/> DL-PG: Most audiences with parental guidance	<input checked="" type="checkbox"/> Profanity and rough language (Beta for Video campaigns)	<input checked="" type="checkbox"/> Embedded videos
<input type="checkbox"/> DL-T: Teen and older audiences	<input checked="" type="checkbox"/> Sexually suggestive (Beta for Video campaigns)	<input type="checkbox"/> Below-the-fold (Display only)
<input checked="" type="checkbox"/> DL-MA: Mature audiences	<input checked="" type="checkbox"/> Sensational and shocking (Beta for Video campaigns)	<input type="checkbox"/> Parked domains (Display only)
<input checked="" type="checkbox"/> Content not yet labeled		<b>Excluded by default</b>



# Section Two- Google Controls

# Google Sensitive Subject Overview

# What is a Sensitive Category?

*Advertisers that promote goods or services that are legally or culturally sensitive*

1. Should an ad be classified as being from one of these sensitive subjects then a certificate will be applied to an account
2. Each policy controlled certificate comes with it's own serving logic
3. We apply controls against Advertisers (Ads) and Publishers (Adsense)
4. Gambling, alongside Alcohol, has our most stringent set of policies

[More information on ad policies](#)



# Gambling Certification

# Gambling as a Sensitive Category

Before a gambling operator can serve ads with Google

Gambling-related ads are only allowed if the advertiser has completed our certification process (contingent on their holding appropriate authorisations in their targeted markets) and must comply with our policies.

We require that gambling advertisers only target approved countries, have a landing page that displays information about responsible gambling, and never target minors.

[Application Form Here](#)

## Gambling application: Single-country license

Gambling is allowed only in the countries listed below. See our [Gambling and games policies](#) for more information.

- If your country isn't listed in the application form it means that either gambling related content isn't allowed in your country or that only state-run entities are allowed to promote such content (See country-specific restrictions here).
- In case of the latter, state-run entities can apply using [this form](#).

Select a country **United Kingdom**

Websites \*

[Add additional](#)

The website(s) listed above should include the following. Without these requirements, we will be unable to move forward with your application. \*

☒ A prominent link to [www.gambleaware.co.uk](#) or [www.gamcare.org.uk](#) \*

☒ A specification that the content is not intended for an audience under 18 years of age \*

Select type of country application \*

**Operator**

For more information regarding types of applications, refer to this [article on gambling-related content policies](#).

Letter explaining link between advertiser & gambling licensee

[Choose File](#) No file chosen

In some cases, if the link between the advertiser and the gambling licensee is not clear, we may request a letter from the licensee explicitly approving the advertiser to promote their website via Google Ads. Feel free to attach a pdf on the licensee letterhead with a relevant stamp and signature in order to expedite the approval process.

Gambling Licensee \*

The Licensee must be the same entity as the Customer or, in the case of an agency application, the Client.

Gambling License number \*

Territory in which Gambling License is held \*

Due to the passage of the [Gambling \(Licence and Advertising\) Act 2014](#), we'll only accept applications for operators licensed by the UK Gambling Commission. Operators can submit a continuation license or full UK license issued by the UK Gambling Commission.

# Search Controls

# Google Controls in Search - Core Overview

## Declared 18s and over

- Logged in +18s can be served gambling ads, in response to gambling-related queries

## Gambling creative cannot serve against certain queries

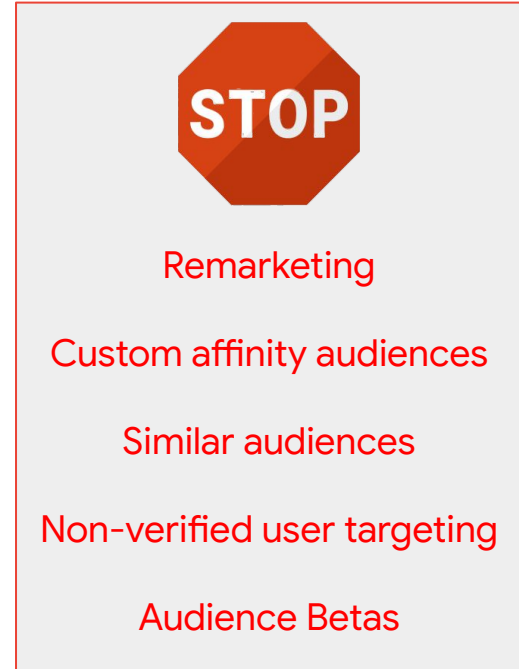
- We have a solution in place that prevents gambling advertisers from targeting specific keywords e.g. "addiction"
- Any non-gambling advertiser is free to advertise on the query blacklist

# Google Controls in Search - Personalised Advertising

We restrict the targeting of users using data collected by the advertiser. This includes; Remarketing; Customer Match and Similar Audiences.

We do allow advertisers to utilise some Google audience segments, e.g. affinities, demographics and in-market audiences.

[More information on personalised advertising usage](#)





# YouTube Controls

# YouTube - Google Controls

YouTube has an array of Responsible Gambling controls that function to protect users, advertisers and our content creators

## User Controls

In order to receive an ad, a user must be **logged in** and be **at least 18 years old**.



## Content Creator Controls

In order to serve an ad for a certified gambling advertiser, YouTube channel owners must purposely opt-in for gambling ads to be shown on their channel and against their content. [More information on the opt in process here](#)

### Allow gambling and betting ads

The Gambling & Betting (18+) restricted category includes online gambling and location-based gambling ads that are only shown to users in regions where gambling is legal. Learn how to allow these ads.

Due to local laws, we strongly suggest that publishers do not opt in to receiving gambling ads if their primary site audience is intended for individuals under 18 years of age (e.g., kids' game sites, high school education sites).

These gambling-related categories are already allowed on the Google Display Network except where disallowed by law:

- Financial spreadbetting
- Competitions/sweepstakes
- Location-based gambling
- Fantasy sports
- Offline gambling accessories

These gambling-related categories will potentially be allowed to run on your site when you opt in, depending on your country and the country in which the end-user is viewing your pages:

- Bingo
- Lotteries
- Online casino games
- Tips, odds and handicapping
- Education/supplemental materials
- Bonus codes
- Sports Betting

Russia, Slovenia, and Poland are lottery-only. Many other specific restrictions apply to a number of countries based on their legal requirements.

# App Controls

# App Campaign Controls

App campaigns lean on the protections associated with each sub-channel

As with YouTube, In order to receive an ad, a user must be **logged in** and verified as being **at least 18 years old**.

Anyone not logged into their Google account will not see a gambling App Campaign ad.

In addition, the same keyword targeting solution used on search applies to app campaigns. This prevents ads from showing next to inappropriate searches on the Play Store.



Google Play  
Store

# Policy Breaches

# What happens if you violate our policies?

Advertisers violating these policies will face disapprovals or suspension.

Ads and extensions that don't follow these policies or local legal requirements may be disapproved. A disapproved ad won't run until the policy violation is fixed and the ad is approved.

An account may be suspended if you have several violations or a serious violation. If this happens, all ads in the suspended account will stop running, and we may no longer accept advertising from you. Any related accounts may also be permanently suspended and your new accounts may be automatically suspended at setup. Learn more about [suspended accounts](#).

To ensure a safe and positive experience for users, Google requires that advertisers comply with all [applicable laws and regulations](#) in addition to the Google Ads policies. It's important to familiarize yourself with and keep up to date on these requirements for the places where your business operates, as well as any other places your ads are showing. When we find content that violates these requirements, we may block it from appearing, and in cases of repeated or serious violations, you may no longer be able to advertise with Google.

## Legal requirements

We expect all advertisers to comply with the local laws for any area their ads target, in addition to the standard Google Ads policies. We generally err on the side of caution in applying this policy because we don't want to allow content of questionable legality.

Below you will find country-specific legal requirements, but note that this is not an exhaustive list. Advertisers are expected to do their own research on the local regulations for any location their ads target. Learn about [what happens if you violate our policies](#).

## Trade sanctions violation

The following is not allowed:

Advertisers must comply with applicable sanctions and export regulations, which includes sanctions administered by the [Office of Foreign Assets Control](#) ("OFAC"), and agree to not cause Google to violate these regulations. You cannot use Ads for or on behalf of restricted entities or individuals. You cannot use Ads for or on behalf of entities or individuals located in sanctioned countries or regions.

In addition, Ads is not available to any entities or individuals that are restricted under applicable trade sanctions and export compliance laws. It is also not available to entities or individuals owned or controlled by or acting for or on behalf of such restricted entities or individuals.

- ❌ Ad campaigns that geographically target embargoed countries or territories
- ❌ Ad campaigns that are run on behalf of businesses that are located in embargoed countries or regions, even if the account owner is not located in an embargoed country or region
- ❌ Ad campaigns that are run by or on behalf of entities or individuals that are restricted under applicable trade sanctions and regulations

**Note:** Google must comply with sanctions imposed by OFAC. Entities and individuals who are restricted cannot create or use a Google Ads account or have Google Ads used on their behalf. People who are located in or ordinarily reside in embargoed countries or territories cannot create or use a Google Ads account. Currently, there are embargoes on Crimea, Cuba, Iran, North Korea, Sudan, and Syria.

Learn how to [fix a suspended account](#).

## Local legal requirements

To see the type of local legal requirements that Google monitors in advertising, select a country from the menu below. Note that this is not an exhaustive list of local legal requirements or countries, and you are still responsible to research and comply with local laws where your business operates and in any region your ads target.

# What happens if you want to report a paid or organic listing?






We have paths that operators can use to report instances of bad ads, or listings they feel should be removed from Google's search results

- [Report an ad here](#)
- [Report organic listings here](#)

### Report an ad

\* Required field

What type of ad do you want to report? \*

☐ Search Ad, i.e. Ad found on a Google search result page

☐ Shopping Ad

☐ Youtube Ad, i.e. Ad found on a Youtube Page

☐ Other Ads, i.e. Ads found on the Google Display Network, Gmail, maps etc

Submit

Some [account](#) and [system](#) information will be sent to Google, and support calls and chats may be recorded. We will use this information to improve support quality and training, to help address technical issues, and to improve our products and services, subject to our [Privacy Policy](#) and [Terms of Service](#).

# Section Three - User Controls








# Gambling Opt-Out

Measures users can take to ensure they can protect themselves from seeing ads that are not appealing to their own needs

In our latest effort to provide individuals with more transparency, choice and control over the ads they see, we have a feature to provide users with the option to see fewer alcohol and gambling ads across Google Search, Youtube and Discover.

Signed-in individuals will have the option to “limit” sensitive categories such as alcohol and/or gambling ads within Ad Settings. While we will do our best not to show ads about the topics an individual has limited, in some cases, an individual might still see an ad containing images related to the topic that they have limited. For example, an ad for a hotel featuring a casino image. This isn’t a gambling ad, even though the ad shows a casino image. Therefore, to appropriately set expectations, we’re using the wording “we’ll do our best not to show them to you”, as individuals may still see ads related to a selected category.

Topics	Brands	Sensitive
<b>You can limit ads about these topics</b> We'll do our best not to show them to you when you're signed into your Google Account on Google Search, YouTube, and Discover.		
 Alcohol Allowed		<input checked="" type="checkbox"/>
 Dating Allowed		<input checked="" type="checkbox"/>
 Gambling Allowed		<input checked="" type="checkbox"/>
 Pregnancy and parenting Allowed		<input checked="" type="checkbox"/>
 Weight loss Allowed		<input checked="" type="checkbox"/>

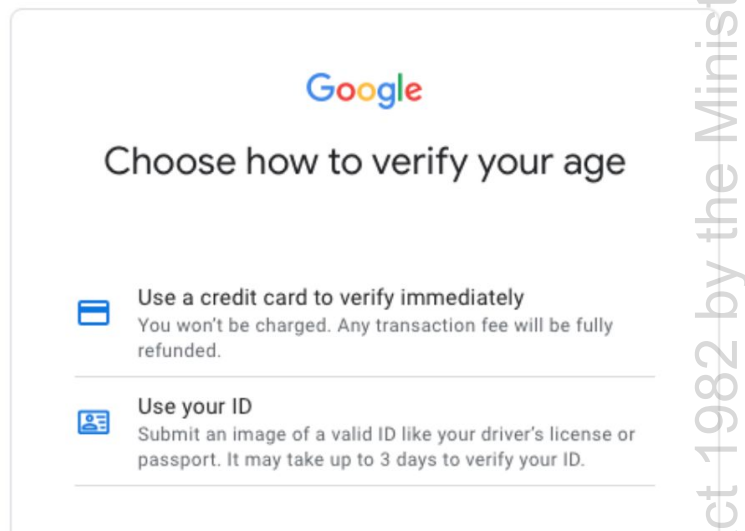
# Age Compliance - ID Verification

If we have learned or if we suspect that users do not meet the minimum age criteria for having a Google account, we will block that account until they are able to verify their age to us.

If they choose not to set up supervision or verify they're old enough to manage their account within 14 days, the account will be disabled and account information will be deleted after 30 days.

If they do meet the minimum age requirements, they can verify their age with a government-issued ID that shows they meet the requirement. They may also have the option to verify their age with a credit card. Note, this differs market by market.

[More information here](#)



Thank you

s22(1)(a)(ii)

**From:** s47F @crownresorts.com.au>  
**Sent:** Wednesday, 13 September 2023 10:37 AM  
**To:** s22(1)(a)(ii) s22(1)(a)(ii) dss.gov.au; s22(1)(a)(ii) s22(1)(a)(ii)  
**Cc:** s47F  
**Subject:** Meeting with Betfair and Crown Resorts  
**Attachments:** s47G(1)(a) Media Release -  
 Introducing Crown Play Safe - Our Plan To Put Gambling Harm Prevention First.pdf

Good Morning,

Thank you for taking the time yesterday to meet with Crown and Betfair.

It was an informative discussion, and we hope the meeting provided you with an understanding of the approaches being taken by Crown and Betfair in regard to the recommendations and also provide you with context of Betfair's operations in comparison to online bookmakers.

We look forward to the Round 2 consultation that will form the Government's views on the recommendations.

As flagged in the meeting yesterday please find attached:

- Crown Media Release on our new PlaySafe – Our Plan to put Gambling Harm Prevention First.

As outlined in the media release the plan includes a renewed focus on player wellbeing and care, a new Crown PlaySafe approach, and the establishment of a dedicated gambling research and policy team which has been led by public health research expert Dr Jamie Wiebe since March 2022. We would be happy to make Dr Wiebe available to the relevant Minister's/ offices and departments to brief you on the plan and provide some context on the research and policy thinking that underpins PlaySafe.

- Betfair's policy on the identification of Red Flag Behaviours.

If you have any questions, please feel free to reach out to anyone of us.

Once again thank you for taking the time yesterday.

Regards,

s47F



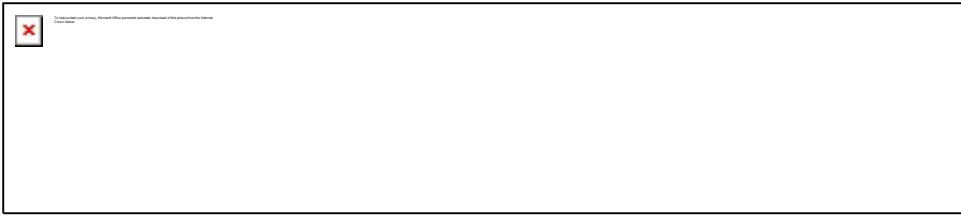
s47F

Director – Corporate Affairs

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E: s47F @crownmelbourne.com.au



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P R E S S   R E L E A S E

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## INTRODUCING CROWN PLAYSAFE: OUR PLAN TO PREVENT GAMBLING HARM

- **Broadened support for players with a focus on preventing gambling harm**
- **Introduction of four key priority areas designed to maximise player safety**
- **Crown PlaySafe to progressively replace Responsible Gaming**
- **New gambling harm research and policy team led by Dr Jamie Wiebe**

**28 July 2023:** Crown Resorts (Crown) has today introduced Crown PlaySafe as part of expanded reforms to reduce gambling harm within its Australian resorts.

The plan forms part of the company's Future Crown transformation program and aims to broaden the company's focus from identifying and supporting those experiencing gambling harm to preventing it from happening in the first place.

The plan includes a renewed focus on player wellbeing and care, a new Crown PlaySafe approach, and the establishment of a dedicated gambling research and policy team which has been led by public health research expert Dr Jamie Wiebe since March 2022.

### Maximising Player Safety

Crown PlaySafe includes several actions and initiatives designed to maximise player safety, including a commitment to acting across four priority areas:

- **Building a safer gambling future, with a focus on prevention and safer play** – when we build and develop our gambling products and safety programs, we do so in a way that learns from successful prevention and harm reduction strategies.
- **Building a safer gambling culture, with care for the community** – working in partnership with government and our regulators, education providers, businesses and industry, and community-based organisations to create a more culturally relevant approach to preventing gambling harm.
- **Building a safer gambling environment, with expanded support for vulnerable or at-risk players** – combining technology and data to implement mandatory carded-play and pre-commitment systems, marketing guardrails, training improvements and other gambling safety features to identify early signs of gambling harm and educate guests to play safely.
- **Building a safer gambling system, to improve our understanding of player behaviour** - investing in research and data monitoring, testing new harm reduction concepts and ideas, sharing and collaborating with our guests, industry experts and critics to design positive and safe player experiences.

Initiatives currently being introduced include mandatory carded-play and pre-commitment systems at Crown Melbourne, cashless gaming on electronic table games at Crown Sydney, \$10 maximum bet limits on electronic gaming machines at Crown Perth, and a new Resorts-wide online self-exclusion portal.

Crown Resorts

8 Whiteman Street Southbank, VIC 3006 Australia

Telephone: +61 2 8871 7188

[crownresorts.com.au](https://crownresorts.com.au)



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## PRESS RELEASE

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### **Crown PlaySafe Approach**

With a focus on prevention, qualitative and quantitative research was undertaken to ensure Crown PlaySafe and its approach had the most impact among those who play within Crown's Australian resorts.

Importantly, Crown PlaySafe was developed in a way that removed stigma by creating an environment where guests understood the role of Crown PlaySafe and the preventative support measures available to them.

Crown will progressively move away from 'Responsible Gambling' to Crown PlaySafe in the year ahead and rollout a new website, logo, colours, language and purpose statement. Crown will also rename position titles across the company and its responsible gaming centres.

### **New gambling harm research and policy team**

Led by gambling harm research and policy specialist Dr Jamie Wiebe, Crown will invest in best practice gambling harm prevention strategies that prioritise player wellbeing and care.

The team will also develop a new knowledge exchange hub for business and industry including awareness and prevention education tools, testing of safer gambling concepts and research, and events and seminars to promote safer, more positive player experiences.

Under new leadership, Crown has invested over \$13 million in gambling harm prevention and support, as well as doubled the size of its Crown PlaySafe team in the last 12 months.

### **Commentary**

Crown Resorts Chief Executive Officer Ciarán Carruthers said Crown's vision is to be a world-leader in gambling harm prevention through best practice actions and initiatives that create a safe and enjoyable entertainment experience for our guests.

"We know that we can do more to maximise player safety, which is why Crown is scaling up all efforts to introduce these world-leading initiatives that help to educate and support guests to play in a positive and safe way.

"The plan addresses new and emerging challenges associated with gambling harm, including how we improve our understanding of gambling participation and develop new harm reduction concepts and ideas.

"With a focus on collaboration and engagement with government, industry and community-based partners, I am confident that together we can reduce gambling harm and create a safer gambling future for all Australians," Mr Carruthers said.

Crown Resorts Group Executive General Manager Responsible Gambling Dr Jamie Wiebe said tackling gambling harm is complex and there are often many factors at play.

Crown Resorts

8 Whiteman Street Southbank, VIC 3006 Australia

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P R E S S   R E L E A S E

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“While our knowledge and understanding of gambling harm has deepened over the years, the introduction of new reforms and expanded support for vulnerable or at-risk players will make it easier for guests to manage and play within their personal limits.

“Gambling safety features like mandatory carded-play, time and spend limits, and online self-exclusion are some of the many tools being implemented to support guests to play safely,” said Dr Wiebe.

Crown PlaySafe was developed in consultation with gambling harm experts and industry, and informed by research into prevention, early intervention, and management of gambling behaviour.

**END**

**Notes to Editor:**

- Crown’s new online self-exclusion portal allows guests to self-exclude themselves from our casinos and opt out of receiving marketing material without the need to visit one of Crown’s Responsible Gaming Centres. Guests can access the portal from any Crown Resorts website.
- Crown has completed technology upgrades and the implementation of the Victorian Government’s card-based pre-commitment scheme, [YourPlay](#), which will become mandatory on all 2,628 Electronic Gaming Machines at Crown Melbourne this December. More than 50,000 registered players are using the scheme today.
- Crown has completed technology upgrades and the implementation of cashless gaming on Electronic Table Games at its VIP casino in Sydney. Crown Sydney has also invested in automation to improve customer onboarding; due diligence checks and improved harm minimisation programs.
- Crown has expanded its support for vulnerable and at-risk players through the completion of technology upgrades and implementation of \$10 maximum betting limits on all 2,188 electronic gaming machines at Crown Perth.
- Crown is working to establish new community advisory panels in Victoria, Western Australia and New South Wales. The panels will help to support partnerships that improve gambling harm awareness and preventative community education programs.

**For more information, please contact:**

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Head of Corporate Communications  
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Group General Manager Communications  
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s22(1)(a)(ii)

s22(1)(a)(ii)

s22(1)(a)(ii)

s22(1)(a)(ii)

s22(1)(a)(ii)

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>

**Sent:** Friday, 15 September 2023 3:38 PM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>

**Cc:** Ross, Pauline <pauline.ross@infrastructure.gov.au>

**Subject:** FW: Follow up [SEC=OFFICIAL]

OFFICIAL

Hi all – Rachael from Rishworth's office and I met with s47F this morning to discuss the gambling inquiry report and she's provided some further information, see below. Would be good to chat about some of this early next week, particularly the World Health Assembly angle.

s22(1)(a)(ii)

OFFICIAL

**From:** s47F <s47F@federation.edu.au>

**Sent:** Friday, 15 September 2023 11:04 AM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@dss.gov.au>

**Subject:** Follow up

Dear s22(1)(a)(ii) and s22(1)(a)(ii)

Thanks very much for your time. Here are a few follow up items and notes that I did not get time to mention:

- Our new paper published this week in the Lancet Regional Health on gambling-related suicides is attached
- It is critical that industry are not treated as a collaborator or stakeholder in policy and research. Their conflict of interest is clear. This needs to be clearly articulated and designed in the response i.e. that they are an economic operator with particular knowledge and expertise but they have a vested interest that is contrary to public health approach.
- I don't support a levy. Gambling should be taxed appropriately and funds allocated to harm prevention etc from consolidated revenues. A levy creates a new industry that is not sufficiently invested in reducing harms, and it is often influenced by industry.
- We need centralised account registration so that we can provide people with tools to help themselves – set universal maximum loss limits, binding pre-commitment (time and money) that is cumulative across operators, and regulators can also have visibility across wagering providers to ensure operators are complying with their duty of care, and penalise them if not. Currently, operators can claim that they did not know someone had 3 accounts, so they were not aware that the losses were as catastrophic, a centralised account registration system building on BetStop (i.e. BetGo) would solve this problem.
- I also note in the *You Win Some You Lose More Report* that AGRC state they receive \$500k from DSS annually to do gambling research. Unless this has changed in recent years my understanding was that they also have an annual ~\$1m+ in appropriation funding that has been going to AIFS overall that appears to have been written into the budget in perpetuity when the AGRC was established. I imagine that the \$500k is in addition to that in the form of contracted research. I would recommend any research funds go through ARC/NHMRC/SPA as they have granting mechanisms in place to ensure independent research.
- Here is the link to the World Health Assembly meeting, which is 21-30 May 2024 in Geneva. This will be the key meeting where it will be important to have gambling raised by member states to be included in the remit of WHO <https://www.who.int/about/governance/world-health-assembly> my contact there is Dr s47F [redacted] Head of Mental Health and Substance Use Division (however he will be retiring in February, they will announce his replacement later this month). I would be very grateful if you could put me in touch with relevant representatives from Australia. Perhaps the staff of Mr Blair Excell who is the Australian representative on that board? This will be a key forum for commencing the development of international frameworks/agreements to address unlicensed operators, as well as other urgent work that Australia can support in addressing the public health aspects of gambling.
- The contact I recommend following up in relation to Council of Europe work on developing cross border agreements to regulate illegal operators is s47F [redacted]
- I fully support the establishment of the gambling data vault that Lauren Levin has proposed. This would also be important for giving access to police and coroners so that can more readily access information in cases of suicide.

Feel free to follow up any time, Thanks, s47F [redacted]

s47F [redacted]  
[redacted] | **Research and Innovation**  
**Health Innovation and Transformation Centre**

**Federation University**  
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[redacted]  
[redacted]  
[redacted]  
[redacted]  
[redacted]

s47F [redacted]



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s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Tuesday, 3 October 2023 9:13 AM  
**To:** s22(1)(a)(ii) s22(1)(a)(ii) s22(1)(a)(ii)  
**Cc:** Lopez, Margaret  
**Subject:** FW: Gambling Advertising Reforms [SEC=OFFICIAL]  
**Attachments:** 02102023 HoR Gambling Advertising Reform Correspondance.pdf

OFFICIAL

FYI all

OFFICIAL

**From:** s47F @galtd.org.au  
**Sent:** Monday, 2 October 2023 9:42 AM  
**To:** Minister.Rowland.MO <Minister.Rowland@MO.COMMUNICATIONS.gov.au>; Minister.rishworth@dss.gov.au; Minister.Wells@health.gov.au  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii) MO.Communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii) MO.communications.gov.au>; s22(1)(a)(ii) dss.gov.au  
**Subject:** Gambling Advertising Reforms

Good Morning, Minister's

Please find attached correspondence on behalf of Greyhounds Australasia, to the Commonwealth Government in response to the public release of the "You Win Some, You Lose More - Online gambling and its impacts on those experiencing gambling harm" Report.

Kind Regards

s47F

s47F

**Chief Executive Officer**  
**Greyhounds Australasia**  
**Phone:** 03 s47F  
**Mobile:** s47F

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**Greyhounds Australasia**  
**Sandown Greyhound Racing Complex**  
**Lightwood Road,**  
**Springvale 3171**  
**Telephone: (03) 9548 3500**

October 2, 2022.

The Hon Michelle Rowland MP, Minister for Communications  
 The Hon Amanda Rishworth MP, Minister for Social Services  
 The Hon Anika Wells MP, Minister for Aged Care and Minister for Sport

via email:

[Minister.rowland@mo.communications.gov.au](mailto:Minister.rowland@mo.communications.gov.au)  
[Minister.rishworth@dss.gov.au](mailto:Minister.rishworth@dss.gov.au)  
[Minister.Wells@health.gov.au](mailto:Minister.Wells@health.gov.au)

Dear Ministers

**RE: Inquiry into online gambling and its impacts on those experiencing gambling harm**

Greyhounds Australasia (GA) is the national organisation for the greyhound control bodies within Australia and New Zealand. Our members are responsible for the control and conduct of greyhound racing across Australia and New Zealand and comprise the statutory authorities from the six states of Australia, the Northern Territory and New Zealand.

GA supports its members through the centralization of key services and administration including, the administration of the ANZ greyhound studbook, coordination of the national rules of racing and the registration of greyhounds in Australia and New Zealand.

GA welcomes the opportunity to provide a written response to the Commonwealth Government following the public release of the "You Win Some, You Lose More - Online gambling and its impacts on those experiencing gambling harm" Report (the Report).

Whilst the matters considered by the Report are wide-ranging, GA's primary concerns relate to the following recommendations, and this correspondence will provide our specific views on these below:

- Recommendation 16 – Prohibition of advertising and offering of inducements.
- Recommendation 26 – A staged rollout of gambling advertising bans.

**General Comments**

GA acknowledges the Report and its recommendations and is supportive of the Government's objective to reduce online gambling harm. GA supports appropriate consumer protection policies focused on the relatively small proportion of Australians considered to be experiencing, or at risk of, gambling harm.

GA also encourages the Government to continue to acknowledge:

- that wagering is a legitimate and safe form of entertainment and recreation which has for generations and continues to be, enjoyed responsibly by millions of Australians.
- the clear distinction between wagering - an activity requiring active participation involving skill and judgement - and other forms of gambling which the Government may be seeking to address; and

- the important differences between wagering on racing, versus wagering on other sports.

Racing and wagering have a unique and intrinsic relationship, established over many generations. Wagering is a core part of the racing product itself and is fundamental to the appeal of the sport. Racing consumers make a specific conscious choice to interact with racing under an explicit understanding and expectation of the intersection with wagering, whether online, through media platforms, on-course or in retail environments.

Unlike non-racing sporting codes, wagering is racing's primary source of revenue, whether through commercial or government-sourced arrangements and with few other independent sources of income otherwise available to racing. Therefore, any decline in wagering poses a disproportionate economic risk to racing and the sustainability and viability of one of Australia's most significant industries. An industry that currently provides a significant contribution to local economies across Australia, State and Federal taxation contributions, and economic support to many thousands of industry participants (both human and animal).

This is in direct contrast to non-racing sporting codes and the more recent saturation and normalisation of wagering as part of the broadcast, sponsorship or branding. Whereby the wagering aspect is secondary to the sporting event or game itself.

We are pleased to see that there is already, in part, some recognition of these differences concerning certain recommendations contained in the Report, and we encourage the Government to continue to recognise these important differences and the unique potential negative impacts of racing throughout its review. We believe that there is strong justification for a differentiated approach to the consideration and potential implementation of some of the recommendations contained within the Report for racing versus other sports.

GA wishes to place on record its specific concerns relating to Recommendation 16 and Recommendation 26.

- **Recommendation 16 – Prohibition of all online gambling inducements and inducement advertising**

GA notes there is a focused recommendation for reform on the advertising and availability of certain types of inducements. However, we also observe that there is considerable uncertainty regarding the definition of inducements as contemplated in the Report and also currently regulated at a state and territory level.

GA understands the Government's primary concerns about the risks and consequences of certain types of inducements, and GA acknowledges and supports the ongoing prohibition of genuine inducements and incentives offered to a person to open a new account, as is the case today.

However, GA strongly believes these inducements should be differentiated from other promotions, brand, pricing and product initiatives that are an intrinsic part of the racing wagering landscape and which a commercial operator ought to be reasonably able to offer in the normal course. Such assets are integral to encouraging and stimulating interest in and driving growth in the racing industry, as they are similarly important and widely utilised without apparent issues in most other industries. Their appropriate use in wagering should be no different.

Any implementation by the Government of recommendations specifically related to a prohibition of inducements (as prescribed in Section 4.40 of the report) has potentially dire impacts on greyhound racing throughout Australia.

Based on modelling jointly conducted by GA Members and major wagering service providers (WSPs) we estimate that the potential national impact of a complete prohibition of all inducements will lead to a catastrophic reduction in revenues across the Australian racing industry. Under the modelling estimates the industry-wide impact of an inducements ban would be:

- **An annual and ongoing reduction in funding to the Australian Greyhound Industry of \$185 million; and**
- **An annual and ongoing reduction in funding to the Australian Racing Industry of \$942 million.**

Furthermore, these prohibitions would lead to an estimated **\$494 million reduction in point of consumption wagering taxes (POCT) collected by state and territory governments**, which is applied to all forms of wagering activity (racing, sports and other types included), and which for most jurisdictions is linked to racing industry funding, and a **\$290 million reduction in GST collected by the Australian Government** drawn from WSP revenues.

A reduction of that scale will force GA's Member Controlling Bodies into dramatically downsizing the footprint of racing, by either reducing returns to tens of thousands of participants (through prizemoney), cutting tens of thousands of jobs (and the resulting social, community, and welfare and income tax implications), reducing investment in the development and maintenance of important regional race clubs and race courses, as well as reducing important spend on animal and participant welfare initiatives.

Many of the industry participants are self-employed or operate as small businesses, are employed across metropolitan and regional Australia, and are diverse across age and gender (noting that female participation in racing is at an all-time high and growing).

There is also a substantial risk that the complete prohibition of inducements will increase the attractiveness of illegal offshore wagering operators which will be able to continue to offer inducements to Australian customers. Any growth within the illegal market has a direct consequential impact on Australian racing's ability to maintain the highest standards of integrity in racing (ie., the ability to monitor betting activity free of untoward influence and association), reduces wagering and taxation revenue for Control Bodies and state and territory governments and also creates a heightened risk to punters who have no consumer protection frameworks with offshore operators.

This leads to difficulties in current and future compliance and enforcement and the potential for overstatement of perceived issues and risks. It is GA's strong view that what constitutes an 'inducement' needs to be better and more specifically defined, agreed and communicated to be understood by all market participants.

Such a framework reflects the fact that there are already differences between state and territory regulators as to what constitutes inducements and how they are treated and what is permitted. Such a framework could also be delivered through the National Consumer Protection Framework, which would still allow for slight variances in local regulator interpretation or emphasis.

GA seeks to highlight the need for inducements to be classified and clearly defined to better reflect their behavioural and beneficial intent, and consequently also allow for appropriate differentiation in how they may be offered, advertised, promoted or used in a manner consistent with their actual risk.

GA seeks a framework recognizing and defining those inducements that are innate product offerings and existing customer benefits or rewards. Including an allowance to ensure that these can continue to be marketed to existing customers who knowingly and readily utilize these offerings as part of their wagering engagement.



As noted already by the Report, the consumers of dedicated racing media platforms are already actively engaged in wagering, with the reasonable further expectation of receiving various wagering offers, promotions and products, hence the recognition of the need to continue to carve out and treat racing media platforms differently from other platforms and channels.

GA proposes that such inducements would be prohibited from advertising on general (non-racing) media (programming and non-racing broadcast, digital, social, static). Though an exemption from any advertising prohibition for racing platforms (broadcast, digital (including social), publications, on-course, off-course retail betting) and an allowance for direct communication (text, email, notifications, in-app offer) to registered and verified account holding customers would also be expressly permitted.

Registered customers are, by definition, adults who have expressed interest in wagering, and have the opportunity to opt in or out of receiving such offers themselves, via self-exclusion safeguards such as Bet Stop and the protections of the National Consumer Protection Framework. Direct communications with registered and verified customer accounts minimise the risk of exposure to unintended recipients and allow for further identification and responsible wagering compliance.

- **Recommendation 26 – Implement the roll-out of a comprehensive ban on all forms of advertising for online gambling.**

GA notes that the Report's recommendations relating to advertising have already contemplated and stipulated exemptions for racing media platforms. The carve-out acknowledges that the consumers of racing platforms are not the primary target of the reforms, and is furthermore, recognition of the obvious intrinsic link between racing and wagering, which does not exist in the same way for other sporting codes.

We strongly support the clear maintenance of the proposed full exemption for racing from wagering advertising restrictions for all racing programming, channels, media platforms, online platforms, racing venues, wagering venues and publications. Although not explicitly mentioned in the recommendations, we would assume this exemption will also apply to print and non-free-to-air channels and publications.

The recommendation (Phase Two) includes a prohibition on all in-stadia advertising, including logos on players' uniforms. GA interprets this as being applicable for other sports, however, seeks clarity that racing is exempt from this ban on the grounds outlined previously (i.e., racing consumers make a conscious choice to be involved in racing in the knowledge that wagering is involved and they will be exposed to it).

GA also notes that there was not an express clarification from the Report on the treatment of static advertising on racecourses, club or track sponsorship and branding of individual races, nor closed circuit racing coverage on any screens accessible to patrons at those racecourses. The vast majority of racing clubs, including small regional and rural racing clubs, are sponsored by WSPs with related on-course static and closed-circuit advertising.

Although GA believes it was not the intent of the Report, the prohibition of sponsorship/branding/on-course advertising would have a substantial impact on the ongoing viability of many greyhound race clubs, particularly those in rural and regional areas. The Government should make clear that branding or sponsorships related to race clubs, carnivals, meetings, individual races, racecourse static advertising, and closed-circuit screens are exempt from any limit or prohibition on broader advertising on all platforms.



## Conclusion

The Report observes that for the majority of people online gambling does not lead to significant harm, and adult Australians can and do enjoy it safely. However, it can cause harm, particularly to children, young people and those experiencing gambling addictions.

GA fully supports the Government in implementing appropriate, evidence-based reform to minimise the risk of online gambling harm occurring to vulnerable individuals, and exacerbating the online gambling harm experienced by the small percentage of Australians who suffer from it.

As already outlined, however, GA is mindful of the significant impacts that could be felt by the greyhound racing industry and broader racing industry, if all recommendations of the Report are implemented in full in their current form.

Accordingly, we would welcome an opportunity to discuss further, with you or your departments, the matters raised within this letter. I can be contacted to proceed with any arrangements <sup>s47F</sup> [REDACTED]

Kind Regards

s47F [REDACTED]

s47F [REDACTED]

**Chief Executive Officer**

**Copy** s22(1)(a)(ii) [REDACTED], Adviser, Office of the Hon Michelle Rowland MP  
s22(1)(a)(ii) [REDACTED] [@MO.Communications.gov.au](mailto:@MO.Communications.gov.au)

s22(1)(a)(ii) [REDACTED], Adviser, Office of the Hon Michelle Rowland MP  
s22(1)(a)(ii) [REDACTED] [@MO.Communications.gov.au](mailto:@MO.Communications.gov.au)

s22(1)(a)(ii) [REDACTED], Adviser, Office of the Hon Amanda Rishworth MP  
s22(1)(a)(ii) [REDACTED] [@dss.gov.au](mailto:@dss.gov.au)

s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Tuesday, 3 October 2023 4:58 PM  
**To:** s22(1)(a)(ii) s22(1)(a)(ii)  
**Cc:** Lopez, Margaret; s22(1)(a)(ii) s22(1)(a)(ii) Rafizadeh, Shervin  
**Subject:** RE: s47C wagering advertising [SEC=OFFICIAL:Sensitive]  
**Attachments:** Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]; Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]; Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]; Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]; Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]; s47C; s47C

OFFICIAL:Sensitive

Hi s22(1)(a)(ii)

s47C

Also attached are the initial emails we sent to stakeholders in July 2023, which requested information about the volume gambling advertising. s47C

s47C

Please let us know if you'd like any further info.

Thank you,

s22(1)(a)(ii)

s22(1)(a)(ii)

Policy Officer • Broadcasting & Gambling Regulation • Media Industry & Sustainability

s22(1)(a)(ii) [infrastructure.gov.au](https://infrastructure.gov.au)

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+61 s22(1)(a)(ii)

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 I recognise and respect their continuing connection to the land, waters and communities.  
 I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.*

OFFICIAL:Sensitive

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)> MO.Communications.gov.au>  
**Sent:** Tuesday, 3 October 2023 1:47 PM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)> INFRASTRUCTURE.gov.au>  
**Cc:** Lopez, Margaret <Margaret.Lopez@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)> infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)> @INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin <s22(1)(a)(ii)> @MO.communications.gov.au>  
**Subject:** RE: s47C

OFFICIAL

Thanks s22(1)(a)(ii) for sending through the updated email, and thanks s22(1)(a)(ii) for the chat just now.

s47C

s22(1)(a)(ii)

OFFICIAL

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)> INFRASTRUCTURE.gov.au>  
**Sent:** Sunday, 1 October 2023 11:39 AM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)> MO.Communications.gov.au>  
**Cc:** Lopez, Margaret <Margaret.Lopez@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)> infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)> @INFRASTRUCTURE.gov.au>  
**Subject:** RE: Draft emails - wagering advertising [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

s47C

s22(1)(a)(ii)

Many thanks,

s22(1)(a)(ii)

s22(1)(a)(ii)

A/g Director • Broadcasting and Gambling Regulation Section • Online Safety, Media and Platforms Division

OFFICIAL

**From:** s22(1)(a)(ii) <s22(1)(a)(ii) [MO.Communications.gov.au](mailto:MO.Communications.gov.au)>

**Sent:** Friday, 29 September 2023 3:08 PM

**To:** Ross, Pauline <[pauline.ross@infrastructure.gov.au](mailto:pauline.ross@infrastructure.gov.au)>

**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii) [INFRASTRUCTURE.gov.au](mailto:INFRASTRUCTURE.gov.au)>; s22(1)(a)(ii) <s22(1)(a)(ii) [infrastructure.gov.au](mailto:infrastructure.gov.au)>

**Subject:** RE: Draft emails - wagering advertising [SEC=OFFICIAL]

OFFICIAL

s47C

s22(1)(a)

iii

OFFICIAL

**From:** Ross, Pauline <[pauline.ross@infrastructure.gov.au](mailto:pauline.ross@infrastructure.gov.au)>

**Sent:** Friday, 29 September 2023 2:49 PM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii) [MO.Communications.gov.au](mailto:MO.Communications.gov.au)>

**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii) [INFRASTRUCTURE.gov.au](mailto:INFRASTRUCTURE.gov.au)>; s22(1)(a)(ii) <s22(1)(a)(ii) [infrastructure.gov.au](mailto:infrastructure.gov.au)>

**Subject:** RE: Draft emails - wagering advertising [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a) – so sorry not to get back to you! s22(1)(a)(ii)

– but s22(1)(a) has updated me on your discussion

regards

**Pauline Ross (she/her)**

A/Assistant Secretary • Media Industry and Sustainability Branch • **Online Safety, Media and Platforms Division**

[Pauline.ross@infrastructure.gov.au](mailto:Pauline.ross@infrastructure.gov.au)

M +61 s22(1)(a)(ii)

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 I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.*

OFFICIAL

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** Friday, 29 September 2023 1:20 PM  
**To:** Ross, Pauline <[pauline.ross@infrastructure.gov.au](mailto:pauline.ross@infrastructure.gov.au)>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Subject:** RE: Draft emails - wagering advertising [SEC=OFFICIAL]

OFFICIAL

s47C

s22(1)(a)(ii)

OFFICIAL

**From:** Ross, Pauline <[pauline.ross@infrastructure.gov.au](mailto:pauline.ross@infrastructure.gov.au)>  
**Sent:** Friday, 29 September 2023 8:34 AM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Subject:** Draft emails - wagering advertising [SEC=OFFICIAL]  
**Importance:** High

OFFICIAL

Hi s22(1)(a)(ii)

s47C Apologies for the delay in getting these to you.

Assuming we're still on for our meeting today?

Regards

**Pauline Ross (she/her)**

A/Assistant Secretary • Media Industry and Sustainability Branch • Online Safety, Media and Platforms Division  
[Pauline.ross@infrastructure.gov.au](mailto:Pauline.ross@infrastructure.gov.au)

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OFFICIAL

s22(1)(a)(ii)

**From:** Windeyer, Richard  
**Sent:** Thursday, 13 July 2023 6:14 PM  
**To:** s47F@snap.com  
**Cc:** Sullivan, Pauline; s22(1)(a)(ii)  
**Subject:** Information requ to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]

## OFFICIAL

Dear s47F

I am writing to seek additional information from you to inform the Government's consideration of the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

As you are aware, the Committee has concluded its inquiry into online gambling and published its final report which includes a recommendation calling for the Government to implement a total ban of gambling advertisements across all platforms within 3 years.

The Government is currently considering the report and will respond to the recommendations by the end of year. While the Committee's recommendations do not represent Government policy at this time, they are a public reference point. Key to being able to advise Government on the recommendations in the report will be to credibly describe and assess the impact on your sector, of the report's recommendations.

For online platforms, the relevant components of the recommendation are as follows:

- Phase 1 — Prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms. The Committee was also of the view that phased restrictions on broadcasters should similarly apply to streaming services.

The Committee was also of the view that phased restrictions on broadcasters should similarly apply to streaming services.

To support our consideration and inform our policy advice to Government, we would appreciate if you could provide the following information:

1. Data about the estimated monetary impact for the recommended ban?
2. The volume of advertisements that would be impacted by the recommended ban?
3. Data on the views/reach of online gambling advertisements on your platform, including any information on the number of children <18?
4. The substitutability deficit of alternative advertisements filling gambling spots for the recommended ban?
5. Any other issues around implementation?

The Department may ask for further information request at a later time, if necessary, in relation to any government proposals under consideration. I am also reaching out to other affected platforms seeking information that will help inform advice to Government.

It would be appreciated if you could come back with any information **by COB 18 July**. The contact person in the Department for this is s22(1)(a)(ii) who can be contacted by phone on 02 6271 s22(1)(a)(iii) or by email at s22(1)(a)(ii)@infrastructure.gov.au, if you have any queries or wish to discuss.

I appreciate you taking the time to action this request.

Regards,

Richard

**Richard Windeyer**

Deputy Secretary • Communications & Media Group

[Richard.Windeyer@communications.gov.au](mailto:Richard.Windeyer@communications.gov.au)

G PO Box 594 Canberra, ACT 2601

P 02 6271 1066

**Executive Assistant:**

s22(1)(a)(ii)

s22(1)(a)(ii) [@communications.gov.au](mailto:@communications.gov.au)

P 02 6271 s22(1)(a)(ii)

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*I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.*

OFFICIAL



s22(1)(a)(ii)

**From:** Windeyer, Richard  
**Sent:** Thursday, 13 July 2023 6:08 PM  
**To:** s47F; s47F@fb.com  
**Cc:** Sullivan, Pauline; s22(1)(a)(ii)  
**Subject:** Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]

## OFFICIAL

Dear s47F and s47F

I am writing to seek information from you to inform the Government's consideration of the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

As you are aware, the Committee has concluded its inquiry into online gambling and published its final report which includes a recommendation calling for the Government to implement a total ban of gambling advertisements across all platforms within 3 years.

The Government is currently considering the report and will respond to the recommendations by the end of year. While the Committee's recommendations do not represent Government policy at this time, they are a public reference point. Key to being able to advise Government on the recommendations in the report will be to credibly describe and assess the impact on your sector, of the report's recommendations.

For online platforms, the relevant components of the recommendation are as follows:

- Phase 1 — Prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms.

The Committee was also of the view that phased restrictions on broadcasters should similarly apply to streaming services.

To support our consideration and inform our policy advice to Government, we would appreciate if you could provide the following information:

1. Data about the estimated monetary impact for the recommended ban?
2. The volume of advertisements that would be impacted by the recommended ban?
3. Data on the views/reach of online gambling advertisements on your platform, including any information on the number of children <18?
4. The substitutability deficit of alternative advertisements filling gambling spots for the recommended ban?
5. Any other issues around implementation?

The Department may ask for further information request at a later time, if necessary, in relation to any government proposals under consideration. I am also reaching out to other affected platforms seeking information that will help inform advice to Government.

It would be appreciated if you could come back with any information **by COB 20 July**. The contact person in the Department for this is s22(1)(a)(ii) who can be contacted by phone on 02 6271 s22(1)(a)(ii) or by email at s22(1)(a)(ii)@infrastructure.gov.au, if you have any queries or wish to discuss.

I appreciate you taking the time to action this request.

Regards,

Richard

**Richard Windeyer**

Deputy Secretary • Communications & Media Group

[Richard.Windeyer@communications.gov.au](mailto:Richard.Windeyer@communications.gov.au)

G PO Box 594 Canberra, ACT 2601

P 02 6271 1066

**Executive Assistant:**

s22(1)(a)(ii)

s22(1)(a)(ii)

[@communications.gov.au](mailto:@communications.gov.au)

P 02 6271 s22(1)(a)(ii)

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OFFICIAL

s22(1)(a)(ii)

**From:** Windeyer, Richard  
**Sent:** Thursday, 13 July 2023 6:10 PM  
**To:** s47F @google.com  
**Cc:** Sullivan, Pauline; s22(1)(a)(ii)  
**Subject:** Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]

OFFICIAL

Dear s47F

I am writing to seek additional information from you to inform the Government's consideration of the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

As you are aware, the Committee has concluded its inquiry into online gambling and published its final report which includes a recommendation calling for the Government to implement a total ban of gambling advertisements across all platforms within 3 years.

The Government is currently considering the report and will respond to the recommendations by the end of year. While the Committee's recommendations do not represent Government policy at this time, they are a public reference point. Key to being able to advise Government on the recommendations in the report will be to credibly describe and assess the impact on your sector, of the report's recommendations.

For online platforms, the relevant components of the recommendation are as follows:

- Phase 1 — Prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms.

The Committee was also of the view that phased restrictions on broadcasters should similarly apply to streaming services.

To support our consideration and inform our policy advice to Government, we would appreciate if you could provide the following information:

1. Data about the estimated monetary impact for the recommended ban?
2. The volume of advertisements that would be impacted by the recommended ban?
3. Data on the views/reach of online gambling advertisements on your platform, including any information on the number of children <18?
4. The substitutability deficit of alternative advertisements filling gambling spots for the recommended ban?
5. Any other issues around implementation?

The Department may ask for further information request at a later time, if necessary, in relation to any government proposals under consideration. I am also reaching out to other affected platforms seeking information that will help inform advice to Government.

It would be appreciated if you could come back with any information **by COB 20 July**. The contact person in the Department for this is s22(1)(a)(ii) who can be contacted by phone on 02 6271 s22(1)(a)(ii) or by email at s22(1)(a)(ii) @infrastructure.gov.au, if you have any queries or wish to discuss.

I appreciate you taking the time to action this request.

Regards,

Richard

**Richard Windeyer**

Deputy Secretary • Communications & Media Group

[Richard.Windeyer@communications.gov.au](mailto:Richard.Windeyer@communications.gov.au)

G PO Box 594 Canberra, ACT 2601

P 02 6271 1066

**Executive Assistant:**

s22(1)(a)(ii)

s22(1)(a)(ii) [@communications.gov.au](mailto:s22(1)(a)(ii)@communications.gov.au)

P 02 6271 s22(1)(a)(ii)

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OFFICIAL

s22(1)(a)(ii)

**From:** Windeyer, Richard  
**Sent:** Thursday, 13 July 2023 6:05 PM  
**To:** s47F @digi.org.au  
**Cc:** Sullivan, Pauline; s22(1)(a)(ii)  
**Subject:** Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]

OFFICIAL

Dear s47F

I am writing to let you know that I have written to a number of your member organisations seeking information to inform the Government's consideration of the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

In the first instance we are looking for information that will allow us to credibly understand and assess the impact of proposals that were recommended in the Committee's report.

As you are aware, the Committee has concluded its inquiry into online gambling and published its final report which includes a recommendation calling for the Government to implement a total ban of gambling advertisements across all platforms within 3 years.

The Government is currently considering the report and will respond to the recommendations by the end of year. While the Committee's recommendations do not represent Government policy at this time, they are a public reference point. Key to being able to advise Government on the recommendations in the report will be to credibly describe and assess the impact on your sector, of the report's recommendations.

For online platforms, the relevant components of the recommendation are as follows:

- Phase 1 — Prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms. The Committee was also of the view that phased restrictions on broadcasters should similarly apply to streaming services.

The Committee was also of the view that phased restrictions on broadcasters should similarly apply to streaming services.

To support our consideration and inform our policy advice to Government, I have written to some of your members seeking the following information:

1. Data about the estimated monetary impact for the recommended ban?
2. The volume of advertisements that would be impacted by the recommended ban?
3. Data on the views/reach of online gambling advertisements on your platform, including any information on the number of children <18?
4. The substitutability deficit of alternative advertisements filling gambling spots for the recommended ban?
5. Any other issues around implementation?

The Department may ask for further information from your sector at a later time, if necessary, in relation to any government proposals under consideration. I am also reaching out to other affected platforms seeking information that will help inform advice to Government.

I have asked your members to come back with any information by COB 20 July. The contact person in the Department for this is s22(1)(a)(ii) who can be contacted by phone on 02 6271 s22(1)(a)(ii) or by email at s22(1)(a)(ii)@infrastructure.gov.au, if you have any queries or wish to discuss.

I appreciate you taking the time to action this request.

Regards,

Richard

**Richard Windeyer**

Deputy Secretary • Communications & Media Group

[Richard.Windeyer@communications.gov.au](mailto:Richard.Windeyer@communications.gov.au)

G PO Box 594 Canberra, ACT 2601

P 02 6271 1066

**Executive Assistant:**

s22(1)(a)(ii)

s22(1)(a)(ii)

[@communications.gov.au](mailto:s22(1)(a)(ii)@communications.gov.au)

P 02 6271 s22(1)(a)(ii)

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OFFICIAL

s22(1)(a)(ii)

**From:** Windeyer, Richard  
**Sent:** Thursday, 13 July 2023 6:12 PM  
**To:** s47F @tiktok.com  
**Cc:** Sullivan, Pauline; s22(1)(a)(ii)  
**Subject:** Information request with respect to House of Representatives Committee inquiry into online gambling [SEC=OFFICIAL]

**OFFICIAL**

Dear s47F

I am writing to seek additional information from you to inform the Government's consideration of the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

As you are aware, the Committee has concluded its inquiry into online gambling and published its final report which includes a recommendation calling for the Government to implement a total ban of gambling advertisements across all platforms within 3 years.

The Government is currently considering the report and will respond to the recommendations by the end of year. While the Committee's recommendations do not represent Government policy at this time, they are a public reference point. Key to being able to advise Government on the recommendations in the report will be to credibly describe and assess the impact on your sector, of the report's recommendations.

For online platforms, the relevant components of the recommendation are as follows:

- Phase 1 — Prohibition of all online gambling inducements and inducement advertising, and all advertising of online gambling on social media and online platforms.

The Committee was also of the view that phased restrictions on broadcasters should similarly apply to streaming services.

To support our consideration and inform our policy advice to Government, we would appreciate if you could provide the following information:

1. Data about the estimated monetary impact for the recommended ban?
2. The volume of advertisements that would be impacted by the recommended ban?
3. Data on the views/reach of online gambling advertisements on your platform, including any information on the number of children <18?
4. The substitutability deficit of alternative advertisements filling gambling spots for the recommended ban?
5. Any other issues around implementation?

The Department may ask for further information request at a later time, if necessary, in relation to any government proposals under consideration. I am also reaching out to other affected platforms seeking information that will help inform advice to Government.

It would be appreciated if you could come back with any information **by COB 18 July**. The contact person in the Department for this is s22(1)(a)(ii) who can be contacted by phone on 02 6271 s22(1)(a)(ii) or by email at s22(1)(a)(ii) @infrastructure.gov.au, if you have any queries or wish to discuss.

I appreciate you taking the time to action this request.

Regards,

Richard

**Richard Windeyer**

Deputy Secretary • Communications & Media Group

[Richard.Windeyer@communications.gov.au](mailto:Richard.Windeyer@communications.gov.au)

G PO Box 594 Canberra, ACT 2601

P 02 6271 1066

**Executive Assistant:**

s22(1)(a)(ii)

s22(1)(a)(ii)

[s22\(1\)\(a\)\(ii\)@communications.gov.au](mailto:s22(1)(a)(ii)@communications.gov.au)

P 02 6271 s22(1)(a)(ii)

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OFFICIAL



s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Thursday, 5 October 2023 9:49 AM  
**To:** Lopez, Margaret; s22(1)(a)(ii)  
**Cc:** s22(1)(a)(ii) s22(1)(a)(ii)  
**Subject:** FW: Online Gambling Inquiry - Information Request Response | NRL  
 [SEC=OFFICIAL:Sensitive]  
**Attachments:** Online Wagering Inquiry - Request for Further Information - NRL.pdf

OFFICIAL:Sensitive

Hi folks – forwarding this on in case it hasn't come to you via other means.

s22(1)(a)(ii)

OFFICIAL:Sensitive

**From:** s47F @nrl.com.au>  
**Sent:** Thursday, 5 October 2023 8:37 AM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii) MO.Communications.gov.au>  
**Subject:** Online Gambling Inquiry - Information Request Response | NRL

Good morning s22(1)(a)(ii)

Please find attached the NRLs response to the request for further information from the department, which has been sent to them this morning.

Don't hesitate to contact me if you require additional detail or clarification regarding the information that is supplied in the attached.

Kind regards

s47F



National Rugby League Ltd

s47F  
 General Manager, Government Partnerships

**m** +61 s47F  
**e** s47F @nrl.com.au  
**w** nrl.com

Rugby League Central  
 Driver Ave  
 Moore Park NSW 2021



The Australian Rugby League Commission acknowledges the Traditional Owners of country throughout Australia. We pay our respects to the Elders past and present.

5 October 2023

s22(1)(a)(ii)

Director Broadcasting and Gambling Regulation Section /  
Media Industry and Sustainability Branch  
Online Safety, Media and Platforms Division  
GPO Box 594  
Canberra, ACT 2601

Via email: s22(1)(a)(ii)@infrastructure.gov.au

CONFIDENTIAL

Dear s22(1)(a)(ii)

Please see below the National Rugby League's response to your request for further information to inform the Government's consideration of the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

We have provided as much information as was possible within the limited timeframe. If further analysis and modelling is required by the department, we will require an estimated 8 weeks to engage a third party to carry this out on our behalf.

I ask that all information provide below remain confidential and it must not be shared beyond the Minister's office and Department or used for any other purpose but to inform this process.

If you need further information, please do not hesitate to contact me on s47F s47F@nrl.com.au or s47F

Your sincerely,

s47F

Executive General Manager – Partnerships  
National Rugby League

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



























s47(1)(b)

## Additional Considerations

The National Rugby League remains fully supportive of the following regulations and measures, that are proposed or are already in place, to minimise gambling harm and exposure of gambling advertising to young people.

### The National Consumer Protection Framework.

With the final element of the National Consumer Protection Framework, the self-exclusion register being implemented on 21 August, the National Rugby League remains confident that this measure, alongside the consistent gambling messaging and further training for wagering staff, will go a long way in minimising gambling harm for vulnerable people.

### Wagering Advertising Black-Out Regulations

The National Rugby League is supportive of and believe the current wagering advertising black-out regulations adequately address the risk of exposure of wagering advertising to young people. These restrictions have existed since March 2018 and apply to the broadcast of all gambling advertisements, including betting-odds, during live sporting events on free-to-air TV, commercial radio and online service providers. The restrictions include:

- Gambling ads cannot be played during and from five minutes before to five minutes after a live sporting event
- No gambling advertising or promotion of odds is allowed during play
- No promotion of odds is allowed during breaks in play (such as half time)
- No promotion of betting odds by commentators and representatives from gambling services (that are, or appear to be, at the venue) are allowed from 30 minutes before play begins until 30 minutes after play.
- During programs that are classified G, C and P, gambling ads are not permitted from 6am to 8.30am and 4pm to 7pm
- During other programs principally directed to children, gambling ads are not permitted between 5am and 8.30pm.

Further to the above, the National Rugby League is supportive of additional measures that the wagering industry has proposed to further protect vulnerable people and encourages the government to implement them across the entire industry. These include:

### A Real Time Intervention Tool

Sportsbet have developed a Real Time Intervention tool which is currently being implemented across its customer base. RTI uses artificial intelligence technology to develop a unique risk profile of each customer to predict what that customer's daily depositing range would be. When a customer attempts a

deposit higher than what the model predicts would be normal for that customer, RTI triggers a safer gambling intervention, before the deposit occurs. This tool therefore aims to operate as harm prevention rather than simply harm minimisation. RTI allows Sportsbet to monitor customers' activity and intervene quickly when they identify customers who may be at risk of developing problems with their gambling.

A data-driven approach represents a clear advantage over blanket, product-based restrictions which do not recognise the individual behaviours of customers; and subjective monitoring of physical behaviours, to the limited extent they can be effectively monitored by one gambling manager (or retail betting operator) in a physical environment with multiple players at the same time. Furthermore, it provides regulators with clear, auditable evidence of implementation of safer gambling interactions. The NRL believes Sportsbet's RTI tool should be rolled out across all online wagering platforms.

#### Reform Funding Model

The funding model for any new reforms should avoid placing additional pressure on the commercial viability of the wagering sector. As such, it has been suggested that the Point of Consumption Tax should be the source of funding, either by way of the state-based tax being replaced by a new Federal tax implemented by a central regulatory body or the states each pay a portion of the POCT that has been collected to fund the new reforms.

s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Thursday, 5 October 2023 12:23 PM  
**To:** s22(1)(a)(ii) Lopez, Margaret; s22(1)(a)(ii)  
**Cc:** s22(1)(a)(ii) Rafizadeh, Shervin  
**Subject:** RE: s47C - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Thanks s22(1)(a)(ii) I've just heard that s47F at Tab is on leave, so if you haven't already can you please forward the request to: s47F [@tabcorp.com.au](mailto:s22(1)(a)(ii)@tabcorp.com.au)

s22(1)(a)(ii)

OFFICIAL:Sensitive

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** Thursday, 5 October 2023 12:06 PM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>; Lopez, Margaret <Margaret.Lopez@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin <s22(1)(a)(ii)@MO.communications.gov.au>  
**Subject:** RE: s47C - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Thanks s22(1)(a)(ii) confirming the emails have gone out.

We'll wait to hear back on the NRL.

Thanks again,

s22(1)(a)(ii)

OFFICIAL:Sensitive

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>  
**Sent:** Thursday, 5 October 2023 10:41 AM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; Lopez, Margaret <Margaret.Lopez@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin <s22(1)(a)(ii)@MO.communications.gov.au>  
**Subject:** RE: s47C - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Thanks s22(1)(a)(ii) looks good, happy for them to be sent.

s47C

s22(1)(a)

(iii)

OFFICIAL:Sensitive

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>  
**Sent:** Thursday, 5 October 2023 10:15 AM  
**To:** Lopez, Margaret <Margaret.Lopez@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin <s22(1)(a)(ii)@MO.communications.gov.au>  
**Subject:** RE: s47C - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Hi s22(1)(a)(iii)

s47C

Thanks also for sending through the NRL's response to the initial information request. We'll take a look through that now – do you have any concerns about going back out to them straight away with this request?

s22(1)(a)(iii)

s22(1)(a)(ii)

Policy Officer • Broadcasting &amp; Gambling Regulation • Media Industry &amp; Sustainability

s22(1)(a)(ii)@infrastructure.gov.au

GPO Box 594 Canberra, ACT 2601

+61 s22(1)(a)(ii)

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OFFICIAL:Sensitive

**From:** Lopez, Margaret <Margaret.Lopez@communications.gov.au>  
**Sent:** Wednesday, 4 October 2023 6:41 PM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Cc:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin

<s22(1)(a)(ii) [REDACTED]@MO.communications.gov.au>

**Subject:** RE: s47C [REDACTED] - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Thanks s22(1)(a)(ii) [REDACTED] - s47C [REDACTED]

Thanks,

**Margaret Lopez**

Assistant Secretary • Media Industry and Sustainability • Online Safety, Media and Platforms

[Margaret.Lopez@communications.gov.au](mailto:Margaret.Lopez@communications.gov.au)

P +61 2 6136 s22(1)(a)(ii) [REDACTED] • M +61 s22(1)(a)(ii) [REDACTED]

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OFFICIAL:Sensitive

**From:** s22(1)(a)(ii) [REDACTED] <s22(1)(a)(ii) [REDACTED]@MO.Communications.gov.au>

**Sent:** Wednesday, 4 October 2023 5:49 PM

**To:** s22(1)(a)(ii) [REDACTED] <s22(1)(a)(ii) [REDACTED]@infrastructure.gov.au>; s22(1)(a)(ii) [REDACTED]

<s22(1)(a)(ii) [REDACTED]@INFRASTRUCTURE.gov.au>

**Cc:** Lopez, Margaret <[Margaret.Lopez@communications.gov.au](mailto:Margaret.Lopez@communications.gov.au)>; s22(1)(a)(ii) [REDACTED]

<s22(1)(a)(ii) [REDACTED]@INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin

<s22(1)(a)(ii) [REDACTED]@MO.communications.gov.au>

**Subject:** RE: s47C [REDACTED] - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

s47C



s47C

s22(1)(a)  
(iii)

OFFICIAL:Sensitive

**From:** s22(1)(a)(ii)

**Sent:** Wednesday, 4 October 2023 5:29 PM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>

**Cc:** Lopez, Margaret <Margaret.Lopez@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin <s22(1)(a)(ii)@MO.communications.gov.au>

**Subject:** RE: s47C - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

s47C

s22(1)(a)  
(iii)

OFFICIAL:Sensitive

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

**Sent:** Wednesday, 4 October 2023 3:33 PM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>

**Cc:** Lopez, Margaret <Margaret.Lopez@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin <s22(1)(a)(ii)@MO.communications.gov.au>

**Subject:** RE: s47C - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Hi s22(1)(a)  
(iii)

Thank you – s47C

s47C

We will organise for these to be sent from Richard's inbox s47C

Thanks again!

s22(1)

(a)(iii)

s22(1)(a)(ii)

Policy Officer • Broadcasting & Gambling Regulation • Media Industry & Sustainability

s22(1)(a)(ii) [infrastructure.gov.au](https://infrastructure.gov.au)

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+61 s22(1)(a)(ii)

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OFFICIAL:Sensitive

**From:** s22(1)(a)(ii) <s22(1)(a)(ii) [MO.Communications.gov.au](mailto:MO.Communications.gov.au)>

**Sent:** Wednesday, 4 October 2023 2:17 PM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii) [infrastructure.gov.au](mailto:infrastructure.gov.au)>; s22(1)(a)(ii)

<s22(1)(a)(ii) [@INFRASTRUCTURE.gov.au](mailto:@INFRASTRUCTURE.gov.au)>

**Cc:** Lopez, Margaret <[Margaret.Lopez@communications.gov.au](mailto:Margaret.Lopez@communications.gov.au)>; s22(1)(a)(ii)

<s22(1)(a)(ii) [infrastructure.gov.au](mailto:infrastructure.gov.au)>; s22(1)(a)(ii)

s22(1)(a)(ii) [@INFRASTRUCTURE.gov.au](mailto:@INFRASTRUCTURE.gov.au); Rafizadeh, Shervin

s22(1)(a)(ii) [@MO.communications.gov.au](mailto:@MO.communications.gov.au)>

**Subject:** RE: s47C - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Hi all

s47C

s22(1)(a)

(iii)

OFFICIAL:Sensitive

**From:** s22(1)(a)(ii)

**Sent:** Tuesday, 3 October 2023 7:23 PM

**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Cc:** Lopez, Margaret <Margaret.Lopez@communications.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>; Rafizadeh, Shervin <s22(1)(a)(ii)@MO.communications.gov.au>  
**Subject:** RE: s47C - wagering advertising [SEC=OFFICIAL:Sensitive]

OFFICIAL:Sensitive

Hi s22(1)(a)(iii) and team

s47C

Thanks  
s22(1)(a)(iii)

OFFICIAL:Sensitive

---

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@infrastructure.gov.au>

**Sent:** Tuesday, 3 October 2023 4:58 PM  
s22(1)(a)(ii) - duplicate email chain

s22(1)(a)(ii)

**From:** Lopez, Margaret  
**Sent:** Friday, 6 October 2023 4:03 PM  
**To:** Gambling, Online; s22(1)(a)(ii)  
**Subject:** FW: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]

OFFICIAL

OFFICIAL

---

**From:** Lopez, Margaret  
**Sent:** Friday, 6 October 2023 4:02 PM  
**To:** s47F d@nrl.com.au' <s47F @nrl.com.au>  
**Cc:** Windeyer, Richard <Richard.Windeyer@communications.gov.au>  
**Subject:** Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]

OFFICIAL

Dear s47F

Thank you for recent submission to the department's initial information request to support consideration of the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm. We appreciate the time you are taking to assist us to understand potential impacts on industry.

s47C



To support timely consideration by Government, we would very much appreciate your advice **by COB 20 October 2023**.

The information you provide to us will form part of the evidence base for the department's deliberations on a range of potential recommendations to Government but our questions do not in any way constitute departmental or

Government views on this complex issue. Any information provided will be kept strictly confidential and only used for the purposes outlined in this email.

**Please note: This consultation is being conducted on a limited basis. It is provided on a strictly confidential basis and should be given appropriate protection. If you wish to disclose, or discuss the contents of this email to any third party, prior written permission from the department must be obtained.**

If you have any queries or wish to discuss, my contact details are below.

Kind regards,

**Margaret Lopez**

Assistant Secretary • Media Industry and Sustainability • Online Safety, Media and Platforms

[Margaret.Lopez@communications.gov.au](mailto:Margaret.Lopez@communications.gov.au)

P +61 2 6136 s22(1)(a)(ii) • M +61 s22(1)(a)(ii)

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OFFICIAL

s22(1)(a)(ii)

**From:** Lopez, Margaret  
**Sent:** Friday, 6 October 2023 4:03 PM  
**To:** s22(1)(a)(ii)  
**Subject:** FW: Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]

OFFICIAL

FYI

**Margaret Lopez**

Assistant Secretary • Media Industry and Sustainability • Online Safety, Media and Platforms

[Margaret.Lopez@communications.gov.au](mailto:Margaret.Lopez@communications.gov.au)

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OFFICIAL

**From:** Windeyer, Richard <Richard.Windeyer@communications.gov.au>  
**Sent:** Thursday, 5 October 2023 11:51 AM  
**To:** s47F @responsiblewagering.com.au; s47F @responsiblewagering.com.au  
**Cc:** Lopez, Margaret <Margaret.Lopez@communications.gov.au>  
**Subject:** Information request – gambling advertising – for response by COB 20 October 2023 [SEC=OFFICIAL]

OFFICIAL

Dear s47F and s47F

Thank you for your engagement to date on the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

I am writing to seek further information in order to better understand your views on Recommendation 26 from the inquiry report regarding gambling advertising, excluding inducements. Information on the latter was sought during the initial consultation phase in July 2023.

s47C

s47C

To support timely consideration by Government, we would very much appreciate your advice **by COB 20 October 2023**. While we have sought information from you on behalf of your members, we also welcome your individual members to provide information directly to us.

The information you provide to us will form part of the evidence base for the department's deliberations on a range of potential recommendations to Government later but our questions do not in any way constitute departmental or Government views on this complex issue. Any information provided will be kept strictly confidential and only used for the purposes outlined in this email.

**Please note: This consultation is being conducted on a limited basis. It is provided on a strictly confidential basis and should be given appropriate protection. If you wish to disclose, or discuss the contents of this email to any third party, prior written permission from the department must be obtained.**

Thank you for the time you are taking to assist us to understand potential impacts on industry. The contact person in the department for this is Margaret Lopez, Assistant Secretary, who can be contacted by phone on 02 6136 s22(1)(a)(ii) or by email at [Margaret.Lopez@communications.gov.au](mailto:Margaret.Lopez@communications.gov.au), if you have any queries or wish to discuss.

Richard

#### **Richard Windeyer**

Deputy Secretary • Communications and Media

[Richard.Windeyer@communications.gov.au](mailto:Richard.Windeyer@communications.gov.au)

P 02 6271 1066

G PO Box 594 Canberra, ACT 2601

#### **Executive Assistant:**

s22(1)(a)(ii)

P 02 6271 s22(1)(a)(ii)

[s22\(1\)\(a\)\(ii\)@communications.gov.au](mailto:s22(1)(a)(ii)@communications.gov.au)

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OFFICIAL



s22(1)(a)(ii)

**From:** s22(1)(a)(ii)  
**Sent:** Friday, 13 October 2023 5:37 PM  
**To:** s22(1)(a)(ii)  
**Subject:** RE: Free TV gambling advertising doc [SEC=OFFICIAL]  
**Attachments:** Regulation Proposal - 13 June 2023.pdf

OFFICIAL

Hi s22(1)(a)(ii) – see attached. s47C

OFFICIAL

**From:** s22(1)(a)(ii) <s22(1)(a)(ii)@INFRASTRUCTURE.gov.au>  
**Sent:** Friday, 13 October 2023 5:34 PM  
**To:** s22(1)(a)(ii) <s22(1)(a)(ii)@MO.Communications.gov.au>  
**Subject:** Free TV gambling advertising doc [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

Shervin mentioned s47(1)(b). We haven't seen this one, and detail was light on in what we received from them the first time around.

Are you able to send me a copy?

Many thanks,  
 s22(1)(a)(ii)

s22(1)(a)(ii)

Assistant Director • Broadcasting and Gambling Regulation Section • Online Safety, Media and Platforms Division

s22(1)(a)(ii) @infrastructure.gov.au

P +61 2 6271 s22(1)(a)(ii)

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OFFICIAL



## The Hon Michelle Rowland MP

Minister for Communications  
Federal Member for Greenway

# Freedom of Information Request 24-153

### **Request**

*Any meetings in relation to online gambling as at the date of this request that have been entered into the minister's and/or the minister's relevant advisor's diaries (as at the date of this request, but inclusive of any meetings that are scheduled after the date of this request), and a list of attendees.*

### **Response:**

The majority of the meetings were requested by the Government, however in some instances the request came from the stakeholder first.

Name of entity/person	Month of meeting	Met/meeting with (Min, MO)	Requested by
Alliance for Gambling Reform	29 June	Ministerial Office Staff	Government
Financial Counselling Australia	29 June	Ministerial Office Staff	Government
Snap	30 June	Ministerial Office Staff	Government
SBS	30 June	Ministerial Office Staff	Government
FreeTV	30 June	Ministerial Office Staff	Government
Meta	30 June	Ministerial Office Staff	Government
NRL	30 June	Ministerial Office Staff	Government
Commercial Radio Australia	30 June	Ministerial Office Staff	Government
Responsible Wagering Australia	4 July	Ministerial Office Staff	Government
Tabcorp	4 July	Ministerial Office Staff	Government
TikTok	7 July	Ministerial Office Staff	Government
Rugby Australia	12 July	Ministerial Office Staff	Government

Name of entity/person	Month of meeting	Met/meeting with (Min, MO)	Requested by
Google	12 July	Ministerial Office Staff	Government
Interactive Advertising Bureau	12 July	Ministerial Office Staff	Government
DIGI	12 July	Ministerial Office Staff	Government
Cricket Australia	14 July	Ministerial Office Staff	Government
Racing Australia	17 July	Ministerial Office Staff	Government
Betr	17 July	Ministerial Office Staff	Government
Channel Seven	17 July	Minister Ministerial Office Staff	Channel Seven
Channel Nine	17 July	Minister Ministerial Office Staff	Channel Nine
PointsBet	18 July	Ministerial Office Staff	Pointsbet
Racing Vic	21 July	Ministerial Office Staff	Government
AFL	21 July	Ministerial Office Staff	Government
Cross-bench briefing	25 July	Ministerial Office Staff	Government
Entain	25 July	Ministerial Office Staff	Entain
BlueBet	26 July	Ministerial Office Staff	BlueBet
International Social Games Association	26 July	Ministerial Office Staff	International Social Games Association
Foxtel	27 July	Ministerial Office Staff	Government
ANRA	27 July	Ministerial Office Staff	Government
Outdoor Media Australia	27 July	Ministerial Office Staff	Government
Peta Murphy MP	2 August	Minister Rowland Minister Rishworth Ministerial Office Staff	Peta Murphy MP
Pointsbet	2 August	Ministerial Office Staff	Pointsbet

Name of entity/person	Month of meeting	Met/meeting with (Min, MO)	Requested by
Greyhound Racing NSW	2 August	Ministerial Office Staff	Greyhound Racing NSW
Senator Pocock	3 August	Ministerial Office Staff	Government
PHAA (Prof Terry Slevin)	3 August	Ministerial Office Staff	Government
Deakin (Prof Samantha Thomas)	3 August	Ministerial Office Staff	Government
Monash (Prof Charles Livingston)	3 August	Ministerial Office Staff	Government
Turning Point, Monash (Dr Shalini Arunogiri)	3 August	Ministerial Office Staff	Government
Australian Psychological Society (Dr Zena Burgess)	3 August	Ministerial Office Staff	Government
Australian Medical Association (Sally Witchalls)	3 August	Ministerial Office Staff	Government
Relationships Australia	3 August	Ministerial Office Staff	Government
Suicide Prevention Australia	3 August	Ministerial Office Staff	Government
Sydney Uni (Prof Sally Gainsbury)	3 August	Ministerial Office Staff	Government
Thoroughbred Breeders Australia	10 August	Ministerial Office Staff	Thoroughbred Breeders
Victorian Responsible Gambling Foundation	11 September	Ministerial Office Staff	Government
BetFair/Crown	12 September	Ministerial Office Staff	Betfair/Crown
Crossbench briefing	13 September	Minister Crossbench MPs Advisers	Government
Federation University (Dr Angela Rintoul)	15 September	Ministerial Office Staff	Dr Angela Rintoul
Adelaide Footy League / Victorian Amateur Football Association / Perth Football League	28 September	Ministerial Office Staff	Adelaide Footy League / Victorian Amateur Football Association / Perth Football League
Alliance for Gambling Reform	11 October	Minister Ministerial Office Staff	Government

Name of entity/person	Month of meeting	Met/meeting with (Min, MO)	Requested by
RWA	18 October	Ministerial Office Staff	RWA
Australian Gambling Research Centre	20 October	Ministerial Office Staff	Australian Gambling Research Centre
Relationships Australia – South Australia	2 November	Minister Ministerial Office Staff	Government
Australian Medical Association	9 November	Minister Ministerial Office Staff	Government
Royal Australian and New Zealand College of Psychiatrists	9 November	Minister Ministerial Office Staff	Government
Prof Charles Livingston	9 November	Minister Ministerial Office Staff	Government
National Aboriginal Community Controlled Health Organisation	9 November	Minister Ministerial Office Staff	Government
Turning Point – Monash	9 November	Minister Ministerial Office Staff	Government
Financial Counselling Australia	9 November	Minister Ministerial Office Staff	Government
Financial Counselling Australia	10 November	Ministerial Office Staff	Financial Counselling Australia
Sportsbet	14 November	Ministerial Office Staff	Sportsbet
AFL	15 November	Minister Ministerial Office Staff	AFL
Financial Counselling Australia	20 November	Ministerial Office Staff	Financial Counselling Australia
Commercial Radio Australia	22 November	Ministerial Office Staff	Commercial Radio Australia
NRL	23 November	Minister Ministerial Office Staff	NRL
Prof Mike Daube, Curtin University + Prof Samantha Thomas, Deakin University	11 December	Minister Ministerial Office Staff Department officials	Deakin and Curtin professors