



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

Mr Richard Eccles
Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
GPO Box 594
Canberra ACT 2601
Via email: Online.Gambling@communications.gov.au

30 April 2025

GA SUBMISSION ON THE STATUTORY REVIEW OF BETSTOP

Dear Mr Eccles

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. Our members are committed to supporting a responsible, transparent, and sustainable wagering environment with strong consumer protections.

GA welcomes the opportunity to contribute to the statutory review of BetStop - the National Self-Exclusion Register. Our members agree with BetStop's aim, to provide Australians with a simple, effective and nationally consistent self-exclusion mechanism across all licensed wagering providers.

GA supports appropriate consumer protection policies focused on the relatively small proportion of Australians considered to be experiencing, or at risk of, gambling harm.

Support for Policy Intent

- GA and its members support BetStop and the policy objectives underpinning it, particularly its aim of providing individuals with an effective tool to manage gambling-related harm through self-exclusion. However, it is noted that the design and implementation process was characterised by limited consultation with key industry stakeholders. As a result, some operational inefficiencies and compliance burdens have been observed.

Operational Challenges

- The decision to implement a "pull model" – requiring the industry to continuously query the register – while functionally aligned with the policy intent, imposes significant cost and resource burdens. It also introduces potential vulnerabilities, as it places the onus entirely on operators to identify and manage exclusions, which may increase the risk of individuals slipping through the system. A "push model," or hybrid model, may achieve greater efficiency and accountability, reducing administrative load while enhancing system integrity
- GA encourages the review to consider a more advanced and flexible model, which will not only improve efficiencies in the current measures, but also provide exploration of advanced features, including a 'take a break' function. The 'take a break' function, which is currently managed at an individual operator level, would allow customers to select a smaller self-

exclusion period (e.g. minimum of 48 hours), which could then be provided immediately to all operators via a 'push model', for execution.

- Introduction of such measures within the BetStop model, would provide a simplified and easier application for Customers, whilst also ensuring a 'single source' for operator application and compliance measures.

Circumvention is a Real and Growing Concern

- GA acknowledges that circumvention of the self-exclusion system is occurring, representing a real risk to the integrity of BetStop. Media reports have recently highlighted methods by which individuals can bypass the register – in some cases, these reports have effectively served as how-to guides.

Account Closure and Reactivation

- There is a need for clear, standardised guidelines on how to manage customer accounts post-registration on BetStop – specifically, the processes for account closure and, where appropriate, reactivation.
- Customers and wagering operators need greater certainty around data retention, communication protocols, and the appropriate handling of individuals with historical gambling activity. These processes must strike a balance between compliance, customer care, and responsible gambling principles.

Greater Public Awareness and Education is Needed

- There is a clear opportunity to improve public awareness and understanding of the BetStop register. A more visible and consistent national education campaign, supported by Department-led collaboration with wagering operators, could significantly enhance uptake and impact.
- These awareness efforts should go together with improvements to the register's operating model and the efficiency of information sharing between the Department, operators, and other relevant bodies.

We believe this review presents a timely opportunity to assess the scale of this problem and to consider targeted policy responses. Any adjustments should avoid creating excessive barriers to registration or discouraging genuine users but should also safeguard the system's credibility and prevent misuse.

To this end, GA requests amendments to the proposed Model in line with our submission be considered. Should there be need for further clarification or information, GA welcomes the chance to continue to engage in this consultation process.

GA and its Members are available to discuss further, with you or your department. I can be contacted to proceed with any arrangements at [REDACTED] and email via [REDACTED].

Kind Regards



Simon Stout
Chief Executive Officer