

**COMMERCIAL-IN-CONFIDENCE**

Director – Publishing and Communications  
Communication Branch  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
GPO Box 594  
Canberra ACT 2601

Wednesday, 23 April 2025

**Re: Statutory Review of BetStop—the National Self Exclusion Register**

Thank you for the opportunity to lodge a submission to the government’s statutory review of BetStop.

Global Players Network Pty Ltd (**GPN**) is a proudly Australian-founded, Australian-owned, Australian-licensed and Australian-run business. We have operated in Australia as a global lottery business for over 20 years and have grown to employ more than 50 staff across our two Darwin and Gold Coast offices.

In 2018, GPN established The Lottery Office (**TLO**), and we are now the largest seller in Australia of matched lottery entries for major international lottery jackpots. The Lottery Office offers Australians access to major international jackpots through our government-approved lotteries.

GPN welcomes the Commonwealth Government’s ongoing commitment to minimising gambling harm in Australia and its interest in our operations. Responsible gambling is an essential part of how we run our business.

We acknowledge the addition to the review’s terms of reference that explores the feasibility of extending the Register to online keno product services and operators following the government’s review into the regulation of online keno and foreign matched lotteries. While GPN does not have online keno products as part of our business, we believe it is important to contribute positively to this review.

**GPN’s commitment to harm minimisation**

Since our licensed operations commenced in 2003, responsible gambling has been a central point of our operating strategies. To this end, TLO has always applied active methodologies to pick up and identify problem gambler and problem customer indicators. Although our techniques have developed over the years, many of TLO’s earlier risk management practices predated what became standard gaming industry requirements decades later.

An important distinction with TLO’s lottery operations compared with retail and in-store lottery products, is that we have always known exactly who our customers are. We have a complete record of their spend history, which enables us to monitor changes or increases that may be a problem indicator. We contact customers by telephone well before they reach any of our spend limits and discuss the affordability of their play and impacts that excessive gambling may have on their lifestyle.

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Our customers enjoy some of the strongest consumer protections of any form of gambling in Australia. In recent years, GPN has ensured that responsible gambling and harm minimisation are at the heart of what we do through the introduction of:

- **Instant Self-Exclusion**
- **Instant Take-A-Break Options**
- **Deposit Limits**
- **Age and ID Verification**
- **Mandatory Maximum Bet Limits**
- **Mandatory Weekly Spend Limits**

We've implemented these industry-leading practices irrespective of the fact that our customers currently can play in 8 different lotteries drawn 2-3 times per week, a comparatively small number in the broader gaming industry where players can place bets every few seconds, with significantly higher spending limits.

### Risk profile of lotteries

Government reports and peer-reviewed research over decades consistently classify lotteries as the gambling activity with the lowest risk profile.

Unlike other forms of gambling, such as sports betting, pokies and online casinos, which facilitate combinations of high-frequency and/or high-stakes gambling, lotteries like those that The Lottery Office conducts, are drawn infrequently and have consistently low average spends and, in our case, capped maximum spends.

In recent years, there has been a significant body of research that has assessed the risk profile of lotteries against other forms of high-frequency gambling in the development of problem gambling. A recent study published in the Journal of Behavioural Addictions in 2023 that investigated over 70,000 cases found that **"bingo and lottery play show no statistically detectable risk for gambling problems."**<sup>1</sup> This was primarily due to the frequency of being able to place bets every few seconds, compared to "lotteries, in which the outcome of a bet may not be known for days or weeks."<sup>2</sup> These findings were echoed in the NSW Government's 2024 gambling survey, which found that there was **"no statistically detectable impact"** of harm on gamblers who played lotteries.<sup>3</sup>

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<sup>1</sup> Unambiguous evidence that over half of gambling problems in Australia are caused by electronic gambling machines: Results from a large-scale composite population study, published in the Journal of Behavioural Addictions:

<https://akjournals.com/view/journals/2006/12/1/article-p182.xml>

<sup>2</sup> Ibid.

<sup>3</sup> NSW Government 2024 Gambling Survey, page 86: <https://www.gambleaware.nsw.gov.au/-/media/nsw-gambling-survey-2024-report.ashx?rev=94d18ccb266b434e9c8f9e391ea1cf1b>

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This Australian evidence builds on the academic research published pre-COVID that assessed the emerging trends in gambling internationally and domestically. Professor Sally Gainsbury's research published in BMC Public Health in 2019 found that "An analysis of 18 national prevalence studies indicated that EGMs, casino gambling, illegal gambling, and Internet gambling were consistently most strongly associated with gambling problems. Sports and horse race betting, and bingo were consistently moderately associated, while **lottery type activities were consistently weakly associated.**"<sup>4</sup>

Similarly, the Productivity Commission in 2010 found that "The most popular form of gambling, lotteries, poses no substantive risks, and this applies to many other types of gambling, such as bingo."<sup>5</sup> Despite the decades of academic research and government reports confirming that lotteries have an extremely low risk profile, GPN remains committed to implementing measures to reduce gambling harm.

We support the objectives of the Register and consider the current exclusion of lottery operators to be appropriate, given the reasons outlined above. However, we remain open to engaging with the Department following the finalisation of the 2026 review, should there be recommendations to expand the Register's remit to include all lottery operators in Australia.

Yours faithfully,



Jaclyn Wood  
**Chief Executive Officer**  
**Global Players Network Pty Ltd**

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<sup>4</sup> Professor Sally Gainsbury et al., Isolating the impact of specific gambling activities and modes on problem gambling and psychological distress in internet gamblers, BMC Public Health, 2019:

<https://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-019-7738-5>

<sup>5</sup> Productivity Commission Inquiry Report into Gambling, 2010, pages 10-11:

<https://www.pc.gov.au/inquiries/completed/gambling-2010/report/gambling-report-volume1.pdf>