



Australian Government

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

Review into the regulation of Online Keno and Foreign-Matched Lotteries

January 2026



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Introduction

The Australian Government is committed to creating a safe online gambling environment underpinned by a robust legislative framework.

The *Interactive Gambling Amendment (Credit and Other Measures) Act 2023* passed the Parliament on 6 December 2023 and commenced in full on 11 June 2024. It amended the *Interactive Gambling Act 2001* (IGA) to prohibit the use of credit cards, credit-related products and digital currency as payment methods for interactive wagering services (i.e. racing and sports betting).

The ban does not capture keno-type lotteries, which, alongside other lottery services, are not included in the definition of ‘wagering services’ (betting on racing and sports) under the IGA. The Government committed to a review of keno-type lotteries in response to the final report from the Senate Standing Committees on Environment and Communications Legislation Committee report on the *Interactive Gambling Amendment (Credit Card and Other Measures) Bill 2023*.

In July 2024, the then Minister for Communications, the Hon Michelle Rowland MP, and the then Minister for Social Services, the Hon Amanda Rishworth MP, announced that the Government had commenced a review into the regulation of online keno and foreign-matched lotteries (the review). The scope of the review was broadened to seek feedback on another new online lottery service – foreign-matched lotteries – in the context of concerns raised by stakeholders about these products.

The review has considered whether online keno and foreign-matched lottery products align with the intent of the IGA, which is to limit the scope of gambling harms in Australia. The review consultation process provided insights into the community impact of these types of online lotteries and a range of views on whether changes to regulations are required to minimise gambling harm.

This report provides an overview of online keno and foreign-matched lotteries, how they are offered in Australia and comparisons to international jurisdictions. This report then outlines review findings and potential policy options that government could consider based on feedback provided by stakeholders.

An overview of the existing regulatory framework is at **Appendix A**.

Terms of reference

The Terms of reference for the review included the following issues:

- the nature and size of online keno and foreign-matched lotteries in Australia
- the impact of existing, new and emerging keno type lotteries and foreign-matched lotteries in Australia
- adverse experiences of these lottery products, including loss of deposits or non-payment of winnings
- the definition of an ‘excluded lottery service’ under the IGA and whether it remains ‘fit for purpose’, and whether these products go against the intent of the IGA to minimise gambling harms from internet technologies
- policy options, including credit and digital payment bans or other restrictions, that could be applied to these products.

The below matters were outside the scope of the review:

- land-based products, including keno played in-venue (i.e. pubs, clubs and hotels)
- matters covered by the House of Representatives Standing Committee on Social Policy and Legal Affairs’ inquiry into online gambling and its impacts on those experiencing gambling harm (Online Gambling Inquiry), and
- the operation of BetStop – the National Self Exclusion Register (NSER).

Consultation process

On 15 July 2024, the department released an Issues Paper to targeted stakeholders including industry, harm reduction advocates, academics, community and charity peak bodies, state and territory governments, and relevant Commonwealth agencies.

The Issues Paper invited stakeholders to provide feedback on 3 issues:

1. Whether online keno and foreign-matched lottery products are consistent with the intent of the IGA and the government's harm minimisation policy objectives.
2. The impacts of online keno and foreign-matched lottery products, particularly any evidence of gambling harm risks to Australian consumers.
3. Whether policy options, including credit and digital payment bans or other restrictions, should be applied to these products.

Consultation closed on 31 October 2024, and the department received 32 submissions. Over the course of the consultation period, the department conducted several meetings with targeted stakeholder groups.

Online keno

Overview

Traditionally, keno has been available as an in-venue game in clubs, pubs, hotels and casinos, and is licenced and regulated by state and territory governments. More recently it has been made available online to consumers via licences issued in Victoria, the Northern Territory and the Australian Capital Territory.

What is online keno?

Online keno is a game of chance, drawn every 3 minutes that offers players the opportunity to win prizes by selecting numbers and matching them with the drawn numbers.

Players select a set of numbers (usually 10-20 numbers) from 1-80 and bet that their numbers will match any of the 20 numbers that are randomly selected from the group of 1-80.

As part of the current statutory review into BetStop – the National Self-Exclusion Register (the NSER) the former Minister for Communications asked that the Terms of Reference for the NSER review be expanded to explore the feasibility of extending the NSER’s coverage to online keno products and services. The NSER allows Australians to self-exclude from online wagering services (primarily online sports and race betting services) with a single registration. The NSER review report is due to the Minister for Communications, the Hon Anika Wells MP, in February 2026.

National regulation and providers

Online keno is an ‘excluded lottery service’ under section 8D of the IGA. As a result, this product is exempt from a number of consumer protection measures implemented in recent years, including the credit card ban and the NSER.

Online keno is offered by 3 licenced providers in Australia:

- Annexio Australia Pty Ltd (LottoGo) – licenced in the Northern Territory
- Lottoland (KenoGo) – licenced in Victoria
- The Lottery Corporation (Keno Online Pty Ltd) – licenced in Victoria and the Australian Capital Territory.

While licenced in the Northern Territory and Victoria, LottoGo and KenoGo are advertised and offered to consumers Australia-wide.

Northern Territory

In the Northern Territory, online keno is licenced under the *Gaming Control Act 1996* via an online gaming licence. Licensed operators must comply with the Northern Territory Code of Practice for Responsible Service of Online Gambling 2019, which provides guidance on responsible gambling practices, and harm minimisation strategies.

Victoria

In Victoria, both online and in-venue keno licences are issued in line with the *Gambling Regulation Act 2003*, and are each authorised to conduct online keno. Lottoland uses this licence to sell online keno to residents of other jurisdictions. Both online keno providers have been issued 20-year licences until 2042 and must adhere to the Ministerial Direction – harm minimisation requirements for online keno providers¹.

¹ Minister for Consumer Affairs, Gaming and Liquor Regulation (Vic), [Ministerial direction for harm minimisation](#), Victorian Government, 13 April 2022

Australian Capital Territory

Online keno is allowed in the Australian Capital Territory in accordance with the *Lotteries Act 1964* and is regulated by the ACT Gambling and Racing Commission.

International regulation

The regulation of keno and the timing of draws in some international jurisdictions varies from Australia.

In Sweden, Belgium and Norway, keno is offered through state-run lotteries, with one draw available per day online or in-store. This is regulated by their respective national gambling authorities: the Swedish Gambling Authority (Spelinspektionen), the Belgian Gaming Commission, and the Norwegian Gambling Authority.

In New Zealand, the Keno Rules 2025², made under the *Gambling Act 2003*, do not mandate a specific number of keno draws. The New Zealand Lotteries Commission determines the frequency and duration of games. Keno draws are currently available 4 times a day at 10:00 am, 1:00 pm, 3:00 pm and 6:00 pm. Players can purchase tickets for these draws in-store or online. The current number of 4 daily draws has been in place since 2014. Previously, keno was available twice a day.

In France, there are currently 2 daily keno draws: a midday draw and an evening draw. However, from November 2025, the number of daily keno draws will be reduced to one.³ Additional changes to the game design will also be implemented, including reducing the grid size to 16 numbers drawn from 56 (down from the current 20 numbers drawn from 70).² Further, the proportion of stakes allocated to winners will decrease from 65.5% to 59.5%.²

Stakeholder views

Alignment with IGA intent and harm minimisation policy objectives

Submissions to the review provided divergent views on the benefits and harms associated with online keno. Wagering providers, traditional lottery providers, harm reduction advocates, academics, community groups and most state and territory jurisdictions that provided submissions to the review expressed that the high frequency and high spend characteristics of online keno is inconsistent with the intent of the IGA.

Harm reduction advocates, community groups and some state regulators suggested that the definition of an 'excluded lottery service' in the IGA is no longer fit for purpose. Some stakeholders suggested that the Minister should use the instrument-making powers of the IGA to amend the definition and impose conditions on such services. However, some online keno operators expressed that their products have a lower harm profile compared to online wagering (betting on sports and racing) and consider that the current definition of an 'excluded lottery service' is fit for purpose.

Online keno operators and some state regulators did not suggest new restrictions, submitting that online keno businesses are already subject to harm reduction rules in Victoria and the Northern Territory as part of their licensing obligations.

Some industry stakeholders pointed to successive Parliamentary inquiries, including the Online Gambling Inquiry, which heard evidence from industry and newsagency peak bodies that traditional lotteries present a lower risk of gambling harm than other gambling products and should be exempt from further restrictions.^{4,5}

² New Zealand Lotteries Commission, *Keno Rules 2025*, New Zealand Government, 2025.

³ National Gaming Authority, *Décision n°2025-021*, French Republic, 2025.

⁴ [House of Representatives Inquiry into online gambling harms and its impacts on those experiencing gambling harms](#) report: You win some, you lose more, June 2023, p.127.

⁵ [Parliamentary Joint Committee on Corporations and Financial Services inquiry report into the regulation of the use of financial services such as credit cards and digital wallets for online gambling in Australia](#), November 2021, p.18-20.

Other stakeholders noted that online keno diverts revenue away from a range of recipients, including the states and territories, which contribute to charitable causes and other services such as health and education infrastructure, in-venue keno providers, newsagency small business owners, and traditional lottery providers. Stakeholders suggested this could lead to lower state and territory government revenues, lottery retailer commissions and fewer jobs.

Impacts and evidence of gambling harm

Some community groups and one state regulator outlined examples of consumer harms from online keno products, including financial losses, spending more than planned, chasing losses, high credit card debt and allegations of aggressive direct marketing.

Other community organisations noted that there is a traditional view amongst their clients that harms from online keno and lotteries are either not real or less harmful than other forms of gambling, which can reduce people's willingness to seek professional help.

Harm reduction advocates, wagering providers, academics, and some regulators submitted that the potential harms from online keno have been understated. Numerous stakeholders recognised the potential for gambling harms from online keno products and called for more research to better understand the risk profile.

Submissions from academics considered that activities that permit high frequency participation are more likely to be associated with harm and more readily facilitate problematic, addictive behaviour, such as loss chasing, with higher risk products typically providing players with the opportunity for fast-paced, repetitive and chance-based games that are available 24 hours a day.

Harm minimisation advocates raised concerns about the high frequency and spending limits offered by online keno products. Submissions to the Senate Standing Committee that recommended this review argued that online keno allows consumers to spend up to \$1,000 every 3 minutes, equating to up to \$20,000 per hour, and some platforms allow players to pre-pay for up to 50 games and play multiple games simultaneously.⁶

Financial Counselling Australia, for example, noted in its submission:

We were taken aback to discover that 56 per cent (of its counsellors) were 'very concerned' (about 'lottery product harm'), with this result ranking above casinos, and way above offshore gambling in terms of concern.⁷

Extension of other harm minimisation measures to online keno

In the interests of protecting consumers and ensuring a level regulatory playing field, harm reduction advocates, academics, wagering providers, community groups, and some state regulators argued that online keno should be subject to the same restrictions as other licensed online wagering providers, such as the NSER and banning credit cards as a payment option. As noted above, an extension of the NSER to online keno products and services is being considered as part of the statutory review of the NSER.

Additional observations on online keno

Some industry stakeholders raised concerns about the expansion of online keno, its impact on traditional lotteries and in-venue keno, and the increase in online keno advertising generally.

Advertising regulation in Australia is intended to strike a balance between legitimate commercial interest and appropriate community safeguards. Online keno is currently advertised widely to Australians without restriction on volume or placement. Keno advertising has increased significantly in recent years, including

⁶ Inquiry by the Senate Standing Committee on Environment and Communications into the Interactive Gambling Amendment (Credit Card and Other Measures) Bill 2023 (October 2023), p.14-16.

⁷ Financial Counselling Australia: Interactive Gambling Amendment (Credit and Other Measures) Bill 2023 (focus on lotteries carveout and vouchers), Environment and Communications Legislation Committee inquiry, 28 September 2023, p.5-6.

during live sports on television and radio and family programming. In 2024, the Nielsen Ad Intel estimated TV media spend for the keno category was \$7.4 million, up from \$4.3 million in 2023.

Some state regulators raised constitutional cross-border and licensing issues. For example, multiple state regulators noted that they are prevented from legislating to restrict trade in this area due to the constitutional guarantee of free interstate trade under section 92 of the Australian Constitution. The regulators called on the Australian Government to introduce national harm minimisation regulations.

Foreign-matched lotteries

Overview

Foreign-matched lotteries are an emerging product that provide Australians with access to overseas lottery draws multiple times a week, when they would otherwise be ineligible to do so, including Powerball and Mega Millions in the United States of America, SuperEnalotto in Italy, and EuroMillions in the United Kingdom, France and Spain.

What are foreign-matched lotteries?

Customers pick lottery numbers through a licensed Australian foreign-matched lottery service provider's app or website. The service provider purchases a ticket in the overseas jurisdiction where the lottery is held with those same lottery numbers, and the customer receives a scanned copy of the ticket. The service provider owns the overseas ticket and will pay out any prizes won from the matched ticket to the customer, minus any taxes imposed by the foreign government on the foreign lottery winnings. The outcome of the draw is determined solely on chance, and prizes are entirely funded by the successful draw of that ticket's numbers.

National regulation and providers

Like online keno, foreign-matched lotteries are an 'excluded lottery service' under the IGA. As a result, this product is also exempt from consumer protection measures.

Foreign-matched lotteries are offered by several operators in Australia:

- Annexio Australia Pty Ltd (LottoGo)
- Gaineroo Pty Ltd (The Lotter)
- Multimedia Lotteries Pty Ltd (LottoHQ)
- The Global Players Network (The Lottery Office)

Northern Territory

All foreign-matched lottery providers are licenced and regulated in the Northern Territory under the *Gaming Control Act 1993*. Foreign-matched lottery providers must comply with the Northern Territory Code of Practice for Responsible Service of Online Gambling 2019, which provides guidance on responsible gambling practices, and harm minimisation strategies.

International regulation

With increasing international involvement in local lottery markets, some overseas jurisdictions have acted to regulate and restrict foreign-matched lotteries.

In the United States of America, gambling is regulated by states. Many states have implemented measures to regulate foreign-matched lotteries, with Texas,⁸ Indiana,⁹ Virginia,¹⁰ and Wisconsin¹¹ all banning this service.

⁸ Texas Lottery, [Texas Lottery Commission Policy Statement on the Prohibition of Lottery Ticket Courier Services](#), Texas Department of Licensing and Regulation, 2025.

⁹ [Indiana House Bill 1053](#), Indiana, 2025.

¹⁰ [§ 58.1-4014. Price of tickets or shares; who may sell; penalty](#), Virginia, 2025.

¹¹ [Wisconsin Statutes § 565.17](#), Wisconsin, 2024.

Meanwhile, Arizona,¹² New York,¹³ and New Jersey¹⁴ have established formal regulations for these services, requiring operators to obtain a licence or official registration to operate legally.

In Oregon, the Lottery Commission has proposed new rules to prohibit lottery retailers from working with operators who facilitate lottery ticket purchases outside of Oregon. The proposed regulations also introduce stringent integrity requirements for foreign-matched lottery services operating exclusively within Oregon.¹⁵

Stakeholder views

Alignment with IGA intent and harm minimisation policy objectives

All foreign-matched lottery providers were of the view that the current definition of an 'excluded lottery service' under the IGA is fit for purpose. Other stakeholders had divergent views, with many noting the lack of research into the harm profile of foreign-matched lotteries. In 2005, foreign-matched lotteries were only emerging as a product and were therefore not considered during the drafting of the IGA.

Some stakeholders noted what they perceived as similarities between foreign-matched lotteries and 'synthetic lotteries'. A synthetic lottery allows customers to bet on the outcome of domestic and international lotteries, without buying an official ticket. The provider pays out the prizes based on the outcome of the lottery draw, with the winnings coming from the provider not the lottery. The *Interactive Gambling Amendment (Lottery Betting) Bill 2018* introduced a ban on synthetic lotteries as they are contrary to the intent of the IGA and provide little taxation revenue and no benefits to Australians.

Impacts and evidence of gambling harm

The harms associated with online lotteries such as foreign-matched lotteries are not well understood. Harm reduction advocates, academics, and some regulators argued the exceptions that allow online lotteries to be excluded from legislated consumer protection measures should not be allowed. These stakeholders also called for targeted research to understand potential harms from online lotteries, including foreign-matched lotteries. They consider that this research should be used to inform any changes to regulatory settings.

Due to the lack of available data, the review could not identify a different harm profile or customer spending profile for foreign-matched lotteries compared to Australian-exclusive lotteries. However, it is acknowledged that international lotteries often have larger jackpots than those in Australia, which could provide an incentive for customers to spend more than intended.

One state regulator stated in its submission:

There is also some evidence that suggests large jackpots motivate play, intensify betting behaviour and lead to players exceeding pre-commitment intentions. Foreign-matched lotteries may therefore present a higher risk than traditional Australian-based lotteries that have lower jackpots.

Extension of other harm minimisation measures to foreign-matched lotteries

Stakeholders generally support extending the credit card ban to foreign-matched lotteries. Most operators noted consumers generally make low spend deposits using credit cards, with most preferring to use debit cards. However, a foreign-matched lottery provider expressed a ban would impact its business revenue, stating that any change should apply to all lottery types to ensure competition is equal.

¹² Arizona Lottery, [Article 11. Lottery Courier Service](#), Arizona, 2025.

¹³ Gaming Commission, [NYCRR Title 9, Executive](#), New York State, 2025.

¹⁴ [NJ Rev Statutes Section 5:9-14.3](#), New Jersey, 2024.

¹⁵ Oregon Lottery, [Proposed Rule Change](#), Oregon Lottery Commission, 2025.

Wagering providers, harm reduction advocates, community groups, some state and territory regulators, and Commonwealth agencies reiterated that online lotteries, including foreign-matched lotteries, should be subject to the same harm reduction framework that currently applies to online wagering services.

Foreign-matched lottery providers submitted that under the Northern Territory Code of Practice for Responsible Service of Online Gambling 2019, they are required to offer consumer protection measures, including self-exclusion, deposit limits, monthly activity statements and voluntary pre-commitments to all their customers.

Additional observations on foreign-matched lotteries

All foreign-matched lottery providers advised that all winnings had been paid to customers, noting they have formal license conditions under Northern Territory regulations.

There have been no large jackpot payouts in Australia to date, but smaller payouts have proceeded without issue. In its submission to the review, the Northern Territory regulator advised that any consumer complaints about foreign-matched lotteries have been related to issues around customer identity verification. The regulator advised that consumers received their winnings from the foreign-matched lottery providers once the consumer identity verification requirements were resolved.

A foreign-matched lottery provider also stated that if there was no regulated way for Australian consumers to buy tickets in overseas lotteries, there would be no licensing or protections for consumers, including the non-payment of winnings by the service provider. The provider suggested that any future policy should consider these consequences.

Policy options

The Issues Paper called for feedback on harm minimisation measures that could be applied to online keno and foreign-matched lottery products. Submissions made by industry, harm reduction advocates, academics, community and charity peak bodies, state and territory governments, and relevant Commonwealth agencies, suggested a range of potential policy actions for consideration by government, including a full ban on online keno and foreign-matched lotteries. The department recommends the below actions based on the policy objectives and intent of the IGA and in light of this stakeholder consultation.

Extending existing consumer protections

Credit card ban

The department recommends prohibiting the use of credit card payments for online keno and foreign-matched lotteries. This would extend existing rules that prohibit the use of credit card payments for wagering services and help limit credit debt and financial hardship for the most vulnerable consumers. While some harm minimisation measures apply to providers at the state or territory level as part of their licensing conditions, extending the credit card ban to online keno and foreign-matched lotteries would create nationally consistent regulations.

Extending the ban on the use of credit cards to online keno and foreign-matched lotteries also recognises the potentially higher harm profile associated with these services and reflects stakeholder submissions to the review.

This policy recommendation is also consistent with the findings of the final report from the Senate Standing Committee on Environment and Communications' inquiry into the *Interactive Gambling Amendment (Credit Card and Other Measures) Bill 2023*.

Consultation with states and territories and industry is needed on legislation to extend the ban. This would also consider any adverse impact on lotteries offered by not-for-profits, charities and Australian newsagents.

The NSER

Pending the outcomes of the NSER review, the department recommends extending the operation of the NSER to online keno. This would contribute to consistent regulation and would allow Australians to self-exclude for more gambling services with a single registration.

Harm reduction advocates and wagering service providers support extending the NSER to online keno products. It would also be welcomed by Australians who have already taken steps to manage their gambling through self-exclusion from other forms of gambling.

If this option is pursued, the department would need to work with the ACMA as well as industry to ensure organisations are able to integrate their customer account systems with the NSER.

Advertising restrictions

The department recommends extending current advertising restrictions in place for interactive wagering services under the *Broadcasting Services Act 1992* and Broadcasting Codes of Practice to online keno. The review found that online keno advertising has grown exponentially and that this may be because it is not subject to the same restrictions as wagering advertising. Online keno advertising has increased significantly in recent years, including during live sports on television and radio, and family programming.

Applying the same restrictions would alleviate concerns about the impact of advertising on consumer behaviour and that the harm profile of online keno is underappreciated.

Further consultation is needed on implementation of this recommendation.

The department does not recommend extending these restrictions to foreign-matched lotteries. Applying restrictions to foreign-matched lotteries may cause confusion with domestic lotteries, which are not subject to the same restrictions.

Further research

The department considers that further research is needed to understand the risk profile of online lotteries, including online keno and foreign-matched lotteries before further restrictions are imposed. In line with findings by a number of earlier Parliamentary inquiries, including the Online Gambling Inquiry, this review confirms there is merit in additional research and collecting specific data on online lotteries in Australia to enable informed government consideration for any future policy actions and whether further regulation is required.

There are differing views about the impacts of foreign-matched lotteries. As such, more evidence is needed to understand the risk profile of these lotteries and how they may differ to domestic land-based lotteries to inform future consideration of regulation, including whether the regulatory costs of extending advertising restrictions or the NSER to foreign-matched lotteries are commensurate with the harms.

Targeted research and data would also support a better understanding of current and projected harms. Traditional lotteries are generally considered to pose a lower risk of harm than other gambling products. However, this view is contested by gambling harm reduction advocates who argue that the frequency and accessibility of online keno draws increases the risk. Numerous stakeholder submissions to the review recognised the potential for gambling harms and called for more research to better understand the risk profile associated with this game design.

Appendix A – Regulatory framework

The intent of the IGA is to minimise the scope of problem gambling in Australia by limiting the types of interactive gambling services available to Australians. The key offence provisions of the IGA apply to the offering of prohibited interactive gambling services (including online blackjack, roulette and poker, which are played for money or anything else of value) or unlicensed regulated gambling services to consumers in Australia.

In 2018, the *Interactive Gambling Amendment (Lottery Betting) Act 2018* was introduced to ban the provision of 'synthetic' lottery betting services (betting on the outcome of a lottery) to customers physically present in Australia. It also clarified that a 'keno-type lottery' is an example of a lottery, effectively prohibiting bets on the outcome of keno draws.

Section 4 – Definitions

lottery includes an electronic lottery.

Note: A keno-type lottery is an example of a lottery.

Subsection 8D(1) of the IGA provides that an 'excluded lottery service' is a service for the conduct and supply of tickets for a lottery (including an electronic lottery but excluding online scratch or online instant lotteries). The ordinary dictionary meaning of 'lottery' is relevant to section 8D.

Section 8D – Excluded lottery service

1. For the purposes of this Act, an *excluded lottery service* is:

- a. a service for the conduct of a lottery; or
- b. a service for the supply of lottery tickets.

1A. Subsection (1) does not apply to a service unless such other conditions (if any) as are specified in the regulations have been satisfied.

1B. Without limiting subsection (1A), a condition specified in regulations made for the purposes of that subsection may provide that the lottery must not be:

- a. a highly repetitive or frequently drawn form of a keno type lottery; or
- b. a similar lottery.

2. Subsection (1) does not apply to an electronic form of:

- a. scratch lottery; or
- b. other instant lottery.