

12 June 2026

Ms Ruvani Panagoda
A/g Assistant Secretary
Broadcasting and Gambling Branch • Broadcasting, Media and News Policy Division
Department of Infrastructure, Transport, Regional Development, Communications, Sports and
the Arts.

Submitted by email to: Online.Gambling@communications.gov.au

Exposure Draft - Interactive Gambling Amendment (Gambling Reform) Bill 2026

Dear Ms Panagoda

Thank you for your email of 29 May 2026 providing Relationships Australia with the opportunity to comment on an Exposure Draft of the Interactive Gambling Amendment (Gambling Reform) Bill 2026. Relationships Australia is strongly of the view that Government should fully implement the recommendations of the Murphy Report as a matter of urgency. Nevertheless, we welcome Government initiatives to prevent and minimise gambling harms and look forward to continuing to work with Government to support the effective regulation of online gambling.

This submission is consistent with previous related submissions, including:

- our submission of 11 November 2022 to the inquiry undertaken by the House of Representatives Social Policy and Legal Affairs Committee into online gambling and its impacts on those experiencing gambling harm
- our submissions to this Department and the Australian Communications and Media Authority concerning gambling harm
- our submission of 30 May 2025 to Mr Richard Eccles, in his role as Statutory Reviewer of BetStop – the National Self-Exclusion Register, and
- our submission to this Department of 27 May 2026 concerning proposed modernisation and harmonisation of classification standards under the National Classification scheme.

Our previous submissions can be found at
<https://www.relationships.org.au/research/#advocacy>.

The work of Relationships Australia

Relationships Australia is a federation of community-based, not-for-profit organisations with no religious affiliations. Our services are for all members of the community, regardless of religious belief, age, gender, sexual orientation, lifestyle choice, cultural background or economic circumstances. We aim to support all people in Australia to live with positive and respectful relationships, and believe that people have the capacity to change how they relate to others.

Relationships Australia believes that violence, coercion, control and inequality are unacceptable. We respect the rights of all people, in all their diversity, to live life fully within their families and communities with dignity and safety, and to enjoy healthy relationships. Our services include:

- individual, couples, and family counselling
- family law counselling, mediation and dispute resolution
- Specialised Family Violence Services
- Children’s Contact Services (services which provide supervised contact and changeovers for high risk families)
- post-separation services for parents and children
- services designed for men, including programs to support parenting capacities and resources, Men’s Behaviour Change Programs, and tailored programs such as the Respectful Relationships Program for Indigenous clients
- parenting capacity programs
- services to support those adversely affected by harmful use of alcohol and other drugs
- gambling help services
- mental health services and program, including suicide prevention, Headspace services, and Family Mental Health Support Services
- therapeutic and case management services to applicants for Redress Support Services, Forgotten Australians, Forced Adoption Support Services, Intercountry Adoptee Family Support Service, and Post Adoption Support Services
- a range of tailored services for older Australians, including senior relationship services, elder mediation, elder abuse case management and mediation, social connection services and mental health services in residential aged care on behalf of Primary Health Networks in South Australia, and
- employee assistance programs.

For more than 75 years, we have worked with our clients to enhance not only family relationships, but also relationships with friends, colleagues, and across communities.

Recommendations

For the reasons set out in our discussion, below, Relationships Australia makes the following recommendations:

Recommendation 1 That a twelve-month post-implementation review be built into the legislative amendments to swiftly identify unintended consequences and implementation challenges, followed by a comprehensive three-year review to assess the impact of the amendments against their policy objectives.

Recommendation 2 That, in recognition of the stresses that gambling harm inflicts on relationships, and co-occurrence of gambling harm with intimate partner violence and abuse of older adults, additional funding be made available to relationships counsellors under the reformed

children and families program administered by the Department of Social Services and the reformed family relationships program administered by the Attorney-General's Department.

- Recommendation 3* That the ACMA receive additional funding to carry out its expanded roles in a way that optimises the successful implementation of these reforms.
- Recommendation 4* A complete ban on wagering advertising content during live sporting events and day time television.
- Recommendation 5* That all relevant prohibitions be elevated to the same level of importance, by incorporation into the Act via the current amendments.
- Recommendation 6* That wagering advertising content be banned from live sporting events without the exceptions for scheduled or unscheduled breaks.
- Recommendation 7* That, to receive wagering advertising content on an online content service, a user must opt in.
- Recommendation 8* That clauses 62P and 62Q be re-framed to create an offence where wagering advertising content is delivered to, or accessed by, among others, a person who has not opted in to receive such content.
- Recommendation 9* That subparagraph 62Y(a)(ii) be omitted as being unreasonably broad, and failing to give sufficient weight to the harm prevention and minimisation objectives of the legislation.
- Recommendation 10* That paragraph 62Y(b) be omitted
- Recommendation 11* That the obligation in clause 61PDA include a timeframe within which providers must notify the Register operator.

Framing principles for this submission

Principle 1 - Commitment to human rights

Relationships Australia contextualises its services, research and advocacy within imperatives to strengthen connections between people, scaffolded by a robust commitment to human rights. Relationships Australia recognises the indivisibility and universality of human rights and the inherent and equal freedom and dignity of all.

Our commitment to human rights necessarily includes a commitment to respecting epistemologies beyond conventional Western ways of being, thinking and doing. A commitment to respecting epistemologies and experiences of Aboriginal and Torres Strait Islander people is acutely important to policy and programme development and service delivery. Connection to Country, and the context-specific experiences of kinship, for example, do not countenance the hyper-individualism that pervades Western social and economic assumptions. Centring the epistemologies and experiences of Aboriginal and Torres Strait Islander people is a necessary (although not sufficient) step in achieving the targets in the National Agreement on Closing the Gap.

Principle 2 - Gambling harm is a pressing public health concern in its own right

Responsibility for population health is a shared responsibility, conferring both freedoms and obligations on individuals, community groups, businesses, corporations and governments at all levels. This responsibility is even greater in respect of children and young people.

The Australian Gambling Research Centre has found that 46% of Australians who gamble were classified as being at some risk of gambling harm.¹ The expansion of online gambling has been rapid, sustained and escalating. It can be offered as an online only product, or as a companion product to offline or land-based activities, and so requires multi-pronged strategies to prevent gambling-related harms. Online gambling is largely synonymous with internet, remote, and interactive gambling. In this submission, 'online gambling' refers to the range of gambling activities offered through interactive technology, including computers, mobile and smart phones, tablets, and digital televisions. While this mode of technologically supported gambling shares most hallmarks of other gambling activities, differences arise from gambling in person at land-based retail outlets and venues and placing wagers over the telephone, mainly in terms of unbridled accessibility. (Gainsbury, 2015) Online gambling has turbo-charged the opportunities for gambling providers in connection with sporting activities. Bans on advertising tobacco and alcohol products through sport created a vacuum that gambling providers have filled with alacrity, causing extensive harm to children and families across Australia.

'Harmful gambling' refers to 'difficulties in limiting money and/or time spent on gambling which leads to adverse consequences for the gambler, others, or for the community' (Neal, Delfabbro & O'Neil, 2005). Gambling-related harms constitute a significant and increasingly pressing public health issue in Australia. Its harms affect not only those who gamble, but also their families and friends, the community and governments. Several studies have found greater levels of harmful gambling among online, compared to offline, gamblers (eg Griffiths et al, 2009; Wood & Williams, 2011). In 2011, the rate of harmful gambling among online gamblers was three times higher than for offline gamblers (Gainsbury, Russell, Hing et al, 2014).

¹ AGRC Community attitudes snapshot, March 2023.

Principle 3 – Commitment to inclusive and universally accessible systems and services

Relationships Australia is committed to universal accessibility of systems and services. This requires government systems and community services to be inclusive and culturally safe services. Our clients (and staff) experience stigma, marginalisation and exclusion arising from diverse circumstances and positionalities. None of these exists at the level of an individual or family. They become barriers to full enjoyment of human rights and full participation in economic, cultural, and social life through the operation of broader systemic and structural factors including:

- legal, political and bureaucratic frameworks
- beliefs and expectations that are reflected in decision-making structures (such as legislatures, courts and tribunals)
- policy settings that inform programme administration, and
- biases or prejudices that persist across society and that are reflected in arts, culture, media and entertainment.

Principle 4 – Fragmentation causes harm

Relationships Australia National Office consistently identifies fragmentation of systems (including legal and regulatory systems) as a principal barrier to authentic accessibility. Forcing families to shoulder the burden of navigating fragmented systems such as classification and online safety systems is the opposite of trauma informed and person-centred, and undermines human rights. Multiple inquiries have found that people are harmed by fragmentation.

Principle 5 - Prevention is key to disrupting harmful behaviours

Intergenerational patterns of engaging in harmful behaviours must be disrupted to achieve major strategic goals including ending gender-based violence within a generation, preventing child sexual abuse, ending abuse and mistreatment of older adults and Closing the Gap.² Harm prevention anchors the achievement of multiple Government health and social policy commitments and priorities. It is a prerequisite of Australia's long-term economic success, boosting labour market and education participation while also lowering avoidable expenditure on health and social services.

Principle 6 – Gambling harms and relationships

Isolation and loneliness

Some people can, without noticing, become increasingly isolated as they immerse themselves in gambling, losing the protective factors that social connection provides, and leaving them vulnerable to a range of harms to physical and mental health that accompany social exclusion

² See, eg, the *National Plan to End Violence Against Women and Children 2022-2032*, the *National Framework for Protecting Australia's Children 2021-2031 (Safe and Supported)*, the *National Strategy to Prevent and Respond to Child Sexual Abuse 2021-2030*, the *National Agreement on Closing the Gap 2020*, and the *National Plan to End Abuse and Mistreatment of Older People 2026-2036*.

and loneliness. In studies of young people, social isolation and loneliness have consistently been associated with poor health outcomes. Pressman and colleagues (2005), for example, found small social networks were independently associated with poor immune response, while adolescents who do not have close friendships and good social networks consistently report lower levels of self-esteem, more psychological symptoms of maladjustment, and are at higher risk of suicide (Kidd, 2004).

In particular, gambling, for some individuals, becomes a substantial barrier preventing them from initiating and nurturing social connections with family, friends and the broader community. Social connection has been studied extensively, both in Australia and overseas, with authors now firmly agreeing about the importance of social connection in shaping wellbeing across the life span, particularly in later life. So important and fundamental is our need to belong, it has often been considered as central to human evolution, with group membership increasing the survival of the human species by encouraging our ancestors to coordinate activities that promoted advantages such as sharing and protecting food, shelter and resources (Baumeister & Learly, 1995).

It is therefore not surprising that deficits in experiences and feelings of belonging have been associated with a range of poor mental, physical and socio-economic outcomes for people, their families and communities. In a meta-analytical review of literature, people who are socially isolated or lonely are at risk of premature mortality at rates comparable with other well-established risk factors, including lack of physical activity, obesity, substance abuse, poor mental health, injury and violence (Holt-Lunstad, 2015). The research literature also identifies relationships between loneliness and poor mental health, including depression and anxiety (Mills & Rubin, 1998; Nangle et. al., 2003; Wang et. al., 2018), lower levels of self-worth (Qualter & Munn, 2002), life satisfaction (Goodwin, Cook, & Yung, 2001) and subjective wellbeing (eg Chipuer, Bramston & Pretty, 2003).

Loneliness is a complex social problem and a public health concern, which should be regarded as a social determinant of health in its own right. It stems from dissatisfaction with our relationships, a lack of positive and respectful relationships, or both of these. It is often caused by experiences of exclusion due to structural and systemic social realities that form obstacles to participation in social, economic, cultural and political life. As a public health concern (Heinrich & Gullone, 2006; Holt-Lunstad et al, 2015; Mance, 2018; AIHW, 2019), loneliness has been linked to physical health risks such as being equivalent to smoking 15 cigarettes a day and an increased risk of heart disease (Valtorta, 2016). Loneliness is a precursor to poorer mental health outcomes, including increased suicidality (Calati et al, 2019; McClelland et al, 2020; Mushtaq, 2014).³

³ The campaign Ending Loneliness Together has released a guide that explains how community organisations can use validated scales to measure loneliness: https://endingloneliness.com.au/wp-content/uploads/2021/08/AGuidetoMeasuring-Loneliness-for-Community-Organisations_Ending-Loneliness-Together.pdf.

Gambling and domestic and family violence

Further, gambling-related harm almost always includes a complex mix of health, financial, relationships and social issues that span domestic and family violence, elder abuse, mental health issues, substance abuse and homelessness. Recent Australian research has found, *inter alia*, that:

- gambling does not directly cause intimate partner violence, but can intersect with it in a range of different ways, including by exacerbating existing violence
- the community lacks awareness about harmful gambling, including its links to intimate partner violence, and •
- gambling-related harm (including economic abuse) is enabled by current protocols of gambling operators and financial institutions (Hing et al, 2020).

Further, gambling has been linked with perpetration of abuse of older adults (particularly by friends of older adults).⁴

Comments regarding the consultation process

We acknowledge that the Department has itself been operating under significant time constraints, and we make these observations in a constructive spirit. Nevertheless, we are concerned that the brevity of the consultation window, combined with a targeted rather than open consultation process, risks disadvantaging and even excluding key community voices. We are particularly concerned that people with lived experience of gambling harm — whose insights are essential to testing whether these amendments will operate as intended — may not have had a meaningful opportunity to contribute. Where legislation bears directly on people's lives and addresses a recognised public health issue, rigorous scrutiny and testing of proposed amendments is not a procedural nicety but a substantive safeguard. While we have been pleased to respond within the timeframe provided, we are conscious that other organisations and individuals, particularly those reliant on volunteer labour, may not have been able to do so.

For this reason, we consider it essential that the amendments incorporate a clear evaluation and monitoring framework from the outset. Specifically, we **recommend** that a twelve-month post-implementation review be built into the legislative amendments to swiftly identify unintended consequences and implementation challenges, followed by a comprehensive three-year review to assess the impact of the amendments against their policy objectives. Incorporating these mechanisms into the legislation itself would go some way to compensating for the compressed consultation process, ensuring that the voices and experiences unable to be heard at this stage can inform refinement of the framework over time. (**Recommendation 1**)

⁴ Qu et al, 2020; see especially pp 73-74, 76-77, 81.

Overarching comments on the Exposure Draft

Overall, Relationships Australia welcomes:

- new restrictions on wagering advertising, including banning wagering advertising content during live coverage of sports
- new requirements on online services to prevent restricted users (including under 18s) from accessing such content
- measures to strengthen the framework for tackling illegal gambling services, including placing positive obligations on financial institutions and online services to prevent payments and access to illegal gambling service
- reforms to enhance the framework governing the National Self-Exclusion Register (known as BetStop), and
- the proposed prohibition of online keno and foreign matched lotteries, and
- clarification of the definition of trade promotion gambling services.

Relationships Australia also welcomes efforts to ensure alignment of the reforms with existing legislation, as well as existing industry rules and codes. We welcome the knitting together of the reforms with current licences. Such approaches support a coherent statute book which, in turn, promotes accessible legislative frameworks, access to justice, and social and political inclusion.

Relationships Australia has previously acknowledged the additional funding, through the 2026-2027 Budget to enhance the availability of financial counsellors to people experiencing gambling harm. We **recommend** that, in recognition of the stresses that gambling harm inflicts on relationships, and co-occurrence of gambling harm with intimate partner violence and abuse of older adults, additional funding be made available to relationships counsellors under the reformed children and families program administered by the Department of Social Services and the reformed family relationships program administered by the Attorney-General's Department. (**Recommendation 2**)

Relationships Australia supports the expansion of the ACMA's powers and functions in support of implementing the proposed prohibitions. We note that, under the measures in the Exposure Draft, the ACMA will:

- have additional regulatory and enforcement functions
- be empowered to take regulatory and enforcement action more swiftly
- have additional complaints handling functions
- have additional powers to advise the Minister on its own motion, and increased responsibilities to advising the Minister in response to a Ministerial direction
- have additional functions to make guidelines.

Relationships Australia **recommends** that the ACMA receive additional funding to carry out its expanded roles in a way that optimises the successful implementation of these reforms. (**Recommendation 3**)

Comments on specific provisions of the Exposure Draft

Provision	Comment
Subclause 10A(1)	Relationships Australia welcomes the inclusion of sporting events taking place outside Australia, and the inclusion of electronic sports.
Subclauses 10A(3), 62M(3), 62P(5), 62Q(4), clause 62S, note 1,	Relationships Australia is concerned that the exclusion of horse, greyhound and harness racing from the definition of ‘sporting event’ and, as a result, the operation of the prohibitions, has the potential to be too broad and may give rise to an unintended consequence whereby these topics become the focus of additional advertising in order to circumvent the ban. While we appreciate the need to carve out dedicated racing channels, we feel this could more easily be done by specific exception rather than a blanket exemption.
Clauses 62K, 62L and 62M	<p>Relationships Australia considers that permitting wagering advertising content to be broadcast up to 3 times in an hour during daytime is not an appropriate balance between the right of adults to gamble (which is not being challenged) and the safety of children. Whether or not wagering is advertised, adults will gamble. Adults with an interest in wagering will find products and advertising for those products. There is no harm to adults if wagering advertising content is banned completely during all day time television (not just during live sporting events plus the intended 5 minute ‘shoulder’ periods); there is certainly harm to children if it is not. Relationships Australia, consistent with previous submissions, recommends a complete ban on wagering advertising content during live sporting events and day time television. (Recommendation 4)</p> <p>Further, we note that the restrictions contained in Part 7C are intended to complement, rather than replace, existing restrictions with respect to gambling advertising during children’s television programs (for example) as found in the Free TV Commercial Television Industry Code of Practice. We are concerned that by allowing the rules to co-occur in separate locations, the amendments unnecessarily create confusion and fragmentation within the system and allocate a ‘tiered level’ of importance among the different prohibitions. Accordingly, we recommend that all relevant prohibitions be elevated to the same level of importance, by incorporation into the Act via the current amendments. (Recommendation 5)</p>

<p>Clause 62L</p>	<p>Relationships Australia notes that, unlike the daytime restrictions, wagering advertising content will be permitted during any scheduled or unscheduled breaks (e.g. halftime or a rain-delay). We consider that this undermines the intent to break the nexus between sporting and wagering and protect children and young people from predatory wagering advertising. As noted by Senator David Pocock during the recent Estimates hearings, children and young people who have started watching a live sporting event before 8.30pm are likely to continue to watch it beyond that time. The 8.30pm ‘watershed’ is out of date and does not reflect contemporary viewing habits – particularly in relation to live sporting events. As noted above, a ban on advertising is not a ban on adults wagering; they may still do so as much as they like. What a ban does do is protect children and young people from predatory grooming behaviour that may harm them while profiting the predators.</p> <p>Relationships Australia recommends that wagering advertising content be banned from live sporting events without the exceptions for scheduled or unscheduled breaks. (Recommendation 6)</p>
<p>Clause 62M</p>	<p>Relationships Australia, consistent with previous submissions, recommends a complete ban on wagering advertising content. (see Recommendation 4)</p>
<p>Clause 62N</p>	<p>Relationships Australia welcomes the ban on advertising during school drop off and pick up times.</p>
<p>Clauses 62P and 62Q</p>	<p>Relationships Australia supports a complete ban on wagering advertising content on all online content services unless the online content service provider takes reasonable steps to ensure that restricted users and age-unverified users do not receive or have access to the content.</p> <p>However, Relationships Australia considers that the current inclusion of an opt out requirement puts all the cards in the hands of the wagering providers. An appropriate balance between the rights of adults to wager and the safety of children requires opt in. Adults who are interested in wagering advertising content will have the sophistication and motivation to opt in. Relationships Australia recommends that, to receive wagering advertising content on an online content service, a user must opt in. (Recommendation 7)</p> <p>Relationships Australia further recommends that, as a consequence, clauses 62P and 62Q be re-framed to create an offence where</p>

	wagering advertising content is delivered to, or accessed by, among others, a person who has not opted in to receive such content. (Recommendation 8)
Clauses 62S, 62T and 62U	Relationships Australia welcomes prohibitions on: <ul style="list-style-type: none"> • sporting uniforms and venues displaying wagering advertising content at any sporting event or activity related to a sporting event, including training sessions and press conferences [clause 62S] • athletes, celebrities and other notable persons promoting wagering advertising content [clause 62T] • promoting odds [clause 62U], and • inclusion in wagering advertising content of harmful or misleading material. <p>We note the Government’s intention to include in the legislation introduced into Parliament application provisions to avoid interfering with existing contracts.</p>
Clause 62V	Relationships Australia supports this provision.
Clause 62W	Relationships Australia supports restrictions on harmful or misleading wagering advertising content.
Clause 62Y	Relationships Australia recommends that subparagraph 62Y(a)(ii) be omitted as being unreasonably broad, and failing to give sufficient weight to the harm prevention and minimisation objectives of the legislation. (Recommendation 9) We further recommend that paragraph 62Y(b) be omitted because absence of benefit does not deprive the otherwise contravening conduct of its harmful effect. (Recommendation 10)
Schedule 2	Relationships Australia welcomes provisions intended to disrupt illegal gambling businesses.
Schedule 2, Part 2 Clause 61AB	Relationships Australia supports the new definition of when online content is taken to be published in Australia (clause 61AB).
Schedule 2, Part 3	Consistent with our support for a digital duty of care, Relationships Australia welcomes the imposition of positive requirements on a wide range of actors to block and disrupt access to designated interactive gambling services.

Schedule 2, Part 4	Relationships Australia welcomes reforms to enable swifter investigative and regulatory responses. We recommend that the ACMA be sufficiently resourced to carry out these functions in a way that supports successful implementation of these reforms. (see Recommendation 3)
Schedule 3, BetStop	Relationships Australia welcomes measures to enhance the effectiveness of BetStop, including through acting on recommendations made in the Eccles Review.
Clause 61GB	Relationships Australia is concerned that care be taken to ensure that relevant skilled persons are not excluded by the operation of clause 61GB and as such would be grateful for further information on the basis on which an individual would be eligible to be prescribed as a qualified counsellor for the purposes of this provision.
Clause 61GE	In our engagement with the Eccles Review, Relationships Australia expressed concerns about the extent to which wagering service providers were evading the operation of the Register through a range of other contact approaches to registrants, which masked marketing activities. Accordingly, Relationships Australia supports the expanded approach to contacts initiated by wagering providers.
Clauses 61GF, 61GG	Consistent with our support for clause 61GE, Relationships Australia supports further restricting the opportunities for wagering service providers to contact registered individuals.
Clause 61HA	Relationships Australia supports measures to ensure continuity of operation of the Register.
Subclause 61JK(2)	Relationships Australia supports application of the 3 month minimum self-exclusion period to all individuals who register, regardless of whether they have previously been registered with BetStop.
Clause 61JKA	Relationships Australia supports the introduction of greater ‘friction’ for removal from BetStop, including by the requirement of an additional positive act on the part of an individual to confirm that they wish to be removed from the Register.
Clause 61MB	Relationships Australia supports the introduction of clearer rules for closing accounts.

Clause 61MC	Relationships Australia welcomes the provisions requiring of account information to be linked, subject to restrictions relating to the purposes of linkage.
Clause 61NC	Relationships Australia welcomes measures to support higher quality data-matching by requiring complete and robust identification data. As we noted to the Reviewer, we are aware of several ways in which registered individuals have been able to circumvent the Register checks by using incomplete information from third parties.
Clause 61PDA	Relationships Australia welcomes measures to impose on providers of regulated interactive gambling services the responsibility of keeping the Register operator updated with changes. However, we recommend that the obligation include a timeframe within which providers must notify the Register operator. (Recommendation 11) This will clarify the obligation and support the integrity of the Register, while also supporting effective operation of subclause (5) (continuing contravention).
Clause 64C	Relationships Australia supports the extended timeframe within which the ACMA can issue infringement notices.
Amendments of the <i>National Self-exclusion Register (Cost Recovery Levy) Act 2019</i>	Consistent with our engagement with the Eccles Review, Relationships Australia supports robust cost recovery in relation to the operation of the Register.
Schedule 4 (Online lottery products)	Consistent with our 2024 submission about regulation of online keno and foreign matched lotteries, Relationships Australia supports prohibition of these activities, as well as clarifications which close the loopholes enabling lotteries and subscription products to exploit the exceptions for genuine trade promotions.

Fragmentation arising from the reliance on legislative instruments

Finally, Relationships Australia wishes to record our growing concern at the extent to which the practical scope and operation of primary legislation is increasingly shaped by legislative instruments. This is a trend evident across the statute book, and it is particularly pronounced in this suite of amendments. We have noted earlier in this submission one concrete example,

where certain prohibitions sit within an existing industry code of conduct while related new rules are located in the Act itself.

It is not difficult to see how this fragmentation of the regulatory framework across instruments of differing status, visibility and enforceability may generate confusion – for industry, for regulators and, most importantly, for the people the framework is designed to protect. We recognise the reasons governments adopt this approach: it affords flexibility, and allows frameworks to adapt without requiring every operational detail to be settled at the point a Bill is passed. These are legitimate considerations. However, they come at a cost to transparency, parliamentary scrutiny, and the coherence and accessibility of the law. We acknowledge that reshaping whole-of-government drafting practice is beyond the remit of any single department. Nonetheless, we urge the Department, in all aspects of its legislative design work, to treat the reduction of complexity and fragmentation as a guiding objective by locating substantive obligations and prohibitions in primary legislation wherever practicable, and ensuring that where legislative instruments are used, their relationship to the Act is clear and readily navigable.

Conclusion

Thank you again for the opportunity to comment on the Exposure Draft. We look forward to continuing to work with the Government to minimise gambling harm across the community. Should you wish to discuss any aspect of this submission, or other matters relating to gambling harm policy, please do not hesitate to contact me at ntebbey@relationships.org.au or on 0422 415 987; alternatively, you can reach our National Policy Manager, Dr Susan Cochrane, at scochrane@relationships.org.au or on 0477 778 659.

Kind regards

A handwritten signature in black ink, appearing to read 'Nick Tebbey', with a stylized flourish at the end.

Nick Tebbey
National Executive Officer

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