

24 July 2026

The Secretary
Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

By email: en.sen@aph.gov.au

Inquiry into the Interactive Gambling Amendment (Gambling Reform) Bill 2026

Thank you for the opportunity to make a submission to the Committee's inquiry into the Interactive Gambling Amendment (Gambling Reform) Bill 2026, together with the National Self-exclusion Register (Cost Recovery Levy) Amendment Bill 2026.

While we acknowledge the importance of, and welcome, the provisions contained in the National Self-exclusion Register (Cost Recovery Levy) Amendment Bill, the majority of this submission will focus on the content of the Interactive Gambling Amendment (Gambling Reform) Bill 2026 (the "IGA Bill") and builds on our submission to the Department of Infrastructure of 12 June 2026 regarding the Exposure Draft of that Bill.¹

This submission is also 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 the 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 the 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>

¹ Several provisions were renumbered between the Exposure Draft and the Bill as introduced. References in this submission are to the Bill as introduced; references in our submission of 12 June 2026 are to the Exposure Draft

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* A complete ban on wagering advertising content during live sporting events and day time television.

- Recommendation 2* That all relevant prohibitions be elevated to the same level of importance, by incorporation into the Act via the current amendments.
- Recommendation 3* That wagering advertising content be banned from live sporting events without the exceptions for scheduled or unscheduled breaks.
- Recommendation 4* That, to receive wagering advertising content on an online content service, a user must opt in.
- Recommendation 5* That clauses 62P and 62Q (and the definition in clause 62H) 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 6* That subparagraph 62ZB(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 7* That paragraph 62ZB(b) be omitted
- Recommendation 8* That the obligation in clause 61PDA include a timeframe within which providers must notify the Register operator.
- Recommendation 9* 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 10* 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 11* That the ACMA receive additional funding to carry out its expanded roles in a way that optimises the successful implementation of these reforms.

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.² 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

² AGRC Community attitudes snapshot, March 2023.

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).

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 to services. 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 into a range of systems 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.³ 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.

³ 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*.

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 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 & Leary, 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).

Gambling and domestic and family violence

Further, gambling-related harm almost always co-occurs with 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

Relationships Australia's position on gambling reforms in Australia

Relationships Australia is strongly of the view that Government should fully implement the recommendations of the Murphy Report as a matter of urgency. Suggestions that full implementation would impede adults' freedom to gamble are disingenuous at best, and are not a plausible counter-argument to recommendations designed to limit the impact of predatory and harmful advertising on our community.

It has been over three years since the landmark report, *You win some, you lose more*, was tabled in Parliament.⁵ The Murphy recommendations reflected and sustained extensive public demand for action to prevent and mitigate the corrosive socio-economic harms caused by a *laissez-faire* approach to gambling regulation. Relationships Australia contributed to the inquiry that led to the Murphy Report and has consistently advocated for its implementation since it was published.

Relationships Australia welcomes the initiatives that have been brought forward in the Bills the subject of this Inquiry. They are, however, only a partial implementation of the Murphy Report at best. While welcome, they are not a substitute for the comprehensive reform it recommended, and they do not discharge the urgency of what remains outstanding. We accordingly urge the Committee to consider the Bills in that broader context, and we look forward to continuing to work with Government to support the effective regulation of online gambling.

⁴ Qu et al, 2021, *National Elder Abuse Prevalence Study*; see especially pp 73-74, 76-77, 81.

⁵ See

https://www.aph.gov.au/Parliamentary_Business/Committees/House/Social_Policy_and_Legal_Affairs/Onlinegamblingimpacts/Report

Overarching comments on the IGA Bill as introduced

Overall, Relationships Australia welcomes:

- new restrictions on wagering advertising, including banning wagering advertising content during live coverage of sporting events, whether broadcast, datacast or provided on online content services, and during school drop-off and pick-up times on radio,
- prohibitions on:
 - the display of wagering advertising content on sporting uniforms and at sporting venues,
 - the use of athletes, celebrities and other notable persons to promote wagering services,
 - the promotion of odds,
 - representatives of wagering service providers appearing in connection with live coverage of sporting events, and
 - harmful or misleading wagering advertising content, including content directed at children or portraying wagering as a family activity or a path to success
- new obligations on online content services to prevent restricted users (including under 18s) from accessing or receiving such content,
- measures to strengthen the framework for tackling illegal gambling services, including placing positive obligations on:
 - financial institutions and payment system participants to prevent payments to illegal gambling services, and
 - internet service providers, domain name system providers, app distribution services and search engine providers to prevent their infrastructure and services being used to provide access to such services, supported by new removal deletion and notice powers and swifter and more robust investigative and regulatory responses,
- reforms to enhance the framework governing the National Self-Exclusion Register (known as BetStop), consistent with recommendations of the Eccles Review, including:
 - expanded restrictions on wagering service providers initiating contact with registered individuals, extending across all current and emerging channels,
 - application of the three-month minimum self-exclusion period to all individuals who register, regardless of previous registration,
 - the requirement for a confirmed, positive act before an individual is removed from the Register,
 - prompt closure of wagering accounts of registered individuals,
 - the linking of account information for harm minimisation purposes,
 - requirements for robust identification data to support higher quality data-matching,
 - measures to ensure continuity of the Register's operation,
 - robust cost recovery, and
 - strengthened penalties across the framework.

- the 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 and current licences, including the consolidation into the Act of gambling advertising rules previously located in Schedule 8 to the *Broadcasting Services Act 1992* and the *Broadcasting Services (Online Content Service Provider Rules) 2018*. Such approaches support a coherent statute book which, in turn, promotes accessible legislative frameworks, access to justice, and social and political inclusion.

Comments on specific provisions of the IGA Bill

Notwithstanding the measures we welcome above, several concerns raised in our submission of 12 June 2026 are not addressed in the Bill as introduced. These are set out below, against the relevant provisions of the Bill, together with our recommended amendments.

Provision	Comment
Clauses 62K, 62L and 62M	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 1) 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 2)

Clause 62L	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 Senate 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. Relationships Australia recommends that wagering advertising content be banned from live sporting events without the exceptions for scheduled or unscheduled breaks. (Recommendation 3)
Clause 62M	Relationships Australia, consistent with previous submissions, recommends a complete ban on wagering advertising content. (see Recommendation 1)
Clauses 62P and 62Q	Since April 2021, Relationships Australia has consistently urged that Government should make online gambling less accessible by increasing 'barriers to entry', and lowering 'barriers to exit', ensuring that those who wish to extricate themselves from online gambling can do so easily and swiftly. The rise of digital technology means that many of the barriers to entry have been progressively eroded at the same time that enticing new pathways are created, and operators promote unencumbered, frictionless access as a desirable 'feature' of online gambling. The Bill acts on this logic where it introduces protective friction into exit from BetStop, which we welcome. But the same logic condemns the opt-out model for wagering advertising. The current opt out requirement puts all the power in the hands of the wagering providers in an already asymmetric relationship. 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 4) Relationships Australia further recommends that, as a consequence, clauses 62P and 62Q (and the definition in clause 62H) 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 5)
Clause 62ZB	Relationships Australia recommends that subparagraph 62ZB(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 6) We further recommend that paragraph 62ZB(b) be omitted because absence of benefit does not deprive the otherwise contravening conduct of its harmful effect. (Recommendation 7)
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 8) This will clarify the obligation and support the integrity of the Register, while also supporting effective operation of subclause (5) (continuing contravention). We note that the Bill imposes express seven-day timeframes on providers elsewhere in the same Schedule (including for the closure of accounts of registered individuals - paragraph 61MB(1)(c)), and consider that there is no evident reason why the notification obligation in clause 61PDA should not be treated similarly.

Post-implementation statutory review

In our submission on the Exposure Draft, we expressed concern that the brevity of the consultation window, combined with a targeted rather than open consultation process, risked disadvantaging and even excluding key community voices. We were 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.

For this reason, we consider it essential that the amendments incorporate a clear evaluation and monitoring framework from the outset. The Bill as introduced contains no such framework.

We therefore **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. (***Recommendation 9***)

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 that stage can inform refinement of the framework over time.

Implementation and resourcing concerns

Supporting relationships impacted by gambling harm

Relationships Australia has previously acknowledged the additional funding, through the 2026-27 Budget, to enhance the availability of financial counsellors to people experiencing gambling harm. However, as set out in Framing Principle 6, above, gambling harm inflicts profound stresses on relationships and co-occurs with intimate partner violence and abuse of older adults. Financial counselling, while essential, does not respond to these relational harms.

Relationships Australia therefore **recommends** 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 10***)

Appropriately resourcing the Regulator

Relationships Australia supports the expansion of the ACMA's powers and functions in support of implementing the proposed prohibitions. We also welcome measures in the National Self-exclusion Register (Cost Recovery Levy) Amendment Bill 2026 to ensure ongoing cost-recovery to fund the regulator's role in managing the promotion and operation of the Register. We note however, that under the IGA Bill it is intended that the range of functions and powers of the ACMA will be significantly expanded. These include provisions by which 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,
- have significant new information-gathering powers over a wide class of persons, and
- administer the new removal, link deletion and app removal notice regime.

Regulatory powers that look great on the statute book languish unused by regulators who do not have the staff and other resources to exercise them as intended. Relationships Australia therefore **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 11)

As we have raised in previous submissions on this issue, Relationships Australia considers that perhaps taxes, rather than levies, are required. Enhanced taxation measures on providers could be used not only to fund the regulator adequately, but also to bridge the yawning chasm between government investment in Gambling Help Services and the need for support services for people experiencing gambling harms (including children and young people).

Additional matters for noting by the Committee

In addition to the recommendations made above, Relationships Australia draws the Committee's attention to two features of the Bill which, while not the subject of specific recommended amendments, warrant scrutiny in the Committee's consideration of the Bill and in any subsequent review of its operation.

Racing carve-out

Relationships Australia remains concerned that the exclusion of horse, greyhound and harness racing from the definition of 'sporting event' (subclause 10A(3)) and, as a result, from the operation of the prohibitions, has the potential to be too broad, and may give rise to an unintended consequence whereby racing becomes the focus of additional wagering advertising in order to circumvent the restrictions.

The Bill as introduced elaborates the machinery of the exclusion, with dedicated racing programs, channels and online content services excepted from the frequency cap, the radio restrictions and the online prohibitions (subsections 62M(3), 62N(3), 62P(9) and 62Q(6)), and racing excluded from the prohibition on the promotion of odds (paragraph 62G(a)).

The anti-avoidance provisions contained within the Bill address schemes designed to avoid the operation of Part 7C. However, they do not reach the lawful redirection of advertising expenditure into racing content, permitted by the operation of the exclusion of dedicated racing programs, channels and online content services.

While we appreciate the need to accommodate dedicated racing channels, we consider this could be achieved by specific exception rather than a blanket exemption, and we encourage the Committee to note this risk and the desirability of monitoring advertising expenditure and volume in racing formats following commencement.

Fragmentation arising from the reliance on legislative instruments

Relationships Australia wishes to record our continuing 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 remains pronounced in this Bill. We acknowledge, and welcome, the consolidation into the Act of gambling advertising rules previously located in Schedule 8 to the *Broadcasting Services Act 1992* and the *Broadcasting Services (Online Content Service Provider Rules) 2018*. However, prohibitions relevant to the protection of children from gambling advertising, such as those found in the Free TV Commercial Television Industry Code of Practice, continue to sit outside the Act, in instruments of lesser status, visibility and enforceability. We remain of the view that all relevant prohibitions should be elevated to the same level of importance by incorporation into the Act.

At the same time, the Bill confers a substantial number of instrument-making powers, including:

- Ministerial determinations as to what constitutes a sporting event, wagering advertising content, a dedicated racing or wagering channel and a notable person,
- determinations by the ACMA of requirements for the 'reasonable steps' exception, and
- register rules governing significant operational matters.

It is not difficult to see how this distribution of the regulatory framework across instruments 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 greater 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 portfolio. Nonetheless, we encourage the Committee to note this concern, and we urge that, in the finalisation of the Bill and the making of instruments under it, the reduction of complexity and fragmentation be treated as a guiding objective – by locating substantive obligations and prohibitions in primary legislation wherever practicable, and by ensuring that where legislative instruments are used, their relationship to the Act is clear and readily navigable.

Conclusion

Thank you for the opportunity to make this submission. We look forward to continuing to work with the Parliament and the Government to prevent and minimise gambling harm across the community, and would welcome the opportunity to give evidence at any hearing the Committee convenes.

Should you wish to discuss any aspect of this submission, 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 'N Tebbey', with a stylized, looping flourish at the end.

Nick Tebbey
National Executive Officer

References

- Australian Gambling Research Centre (2023) Community attitudes towards sports and race betting advertising in Australia. (Community attitudes snapshot)
- Australian Gambling Research Centre (2023) Gambling participation and experience of harm in Australia. (Participation and experience snapshot)
- Australian Gambling Research Centre (2023) Gambling participation, experience of harm and community views: An overview. Melbourne: Australian Gambling Research Centre: Australian Institute of Family Studies
- Australian Gambling Research Centre (2023) Community attitudes towards sports and race betting advertising in Australia. Melbourne: Australian Gambling Research Centre: Australian Institute of Family Studies (Advertising attitudes snapshot)
- Australian Institute of Health and Welfare (2019). Social isolation and loneliness. Viewed 02 September 2021, <https://www.aihw.gov.au/reports/australias-welfare/socialisolation-andloneliness>
- Backholer, K. & Pathirana, N. L. #Digital Youth: How children and young people are targeted with harmful marketing online.
- Baumeister, R. F., & Leary, M. R. (1995). The need to belong: Desire for interpersonal attachments as a fundamental human motivation. *Psychological Bulletin*, 117(3), 497–529. <https://doi.org/10.1037/0033-2909.117.3.497>
- BDO EconSearch. (2019) Cost Benefit Analysis of Gambling Help Services. A Report to Relationships Australia South Australia
- Browne, B. (2020). Gambling on games: How video games expose children to gambling. Discussion paper. Canberra: Australia Institute. Retrieved from www.infrastructure.gov.au/sites/default/files/submissions/centre-for-responsible-technology.pdf
- Calati, R., Ferrari, C., Brittner, M., Oasi, O., Olié, E., Carvalho, A. F., & Courtet, P. (2019). Suicidal thoughts and behaviors and social isolation: A narrative review of the literature. *Journal of Affective Disorders*, 245, 653-667
- Chipuer, H. M., Bramston, P., & Pretty, G. (2003). Determinants of Subjective Quality of Life among Rural Adolescents: A Developmental Perspective. *Social Indicators Research*, 61(1), 79–95. <http://www.jstor.org/stable/27527062>
- Deblaquiere J, Carroll M & Jenkinson R (2018). Submission to Senate Environmental and Communications References Committee Inquiry into gaming micro-transactions for chance-based items. Accessible at https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Gamingmicro-transactions/Submissions
- Derevensky, J. L. Marchica, L., Richard, J. (2021) The Migration between gaming and gambling: our current knowledge. *Pediatric Research and Child Health*.
- Derevensky, J., Sklar, A., Gupta, R., & Messerlian, C. (2010). An empirical study examining the impact of gambling advertisements on adolescent gambling attitudes and behaviors. *International Journal of Mental Health and Addiction*, 8(1), 21-34.
- Freytag C, Lee J, Hing N, & Tully, D (2020) The dangerous combination of gambling and domestic and family violence against women. Practice guide for gambling counsellors, financial counsellors and domestic and family violence workers. ANROWS Insights 06/2020.

Gainsbury, S. (2012) Internet gambling: Current research findings and implications

Gainsbury SM. Online Gambling Addiction: the Relationship Between Internet Gambling and Disordered Gambling. *Curr Addict Rep.* 2015;2(2):185-193. doi: 10.1007/s40429-015-0057-8. Epub 2015 Apr 11. PMID: 26500834; PMCID: PMC4610999.

Gainsbury, S. M., Russell, A., Hing, N., Wood, R., Lubman, D. I., & Blaszczynski, A. (2014). The prevalence and determinants of problem gambling in Australia: Assessing the impact of interactive gambling and new technologies. *Psychology of Addictive Behaviors*, 28(3), 769–779. <https://doi.org/10.1037/a0036207>

Global Betting and Gaming Consultants (2014) Global Gambling Report

Goodwin, R., Cook, O., & Yung, Y. (2001). Loneliness and life satisfaction among three cultural groups. *Personal Relationships*, 8(2), 225–230. <https://doi.org/10.1111/j.1475-6811.2001.tb00037.x>

Greer, N, Boyle, C M & Jenkinson R. (2022) Harms associated with loot boxes, simulated gambling and other in-game purchases in video games: a review of the evidence.

Griffiths, M (2009) Problem gambling in Europe: An Overview.

Gupta. C., Campbell, M. Robards, B. & Fordyce, R. (2025) Playing the Player: Unfair digital gaming practices and their impact on Australians.

H2 Gambling Capital. (2013). There's nothing virtual about the opportunity in real-money gambling: Opportunities for game developers in regulated real-money online gambling. England: H2 Gambling Capital.

Hawkley, L C, Zheng, B, Song, X, Negative financial shock increases loneliness in older adults, 2006–2016: Reduced effect during the Great Recession (2008–2010), *Social Science & Medicine*, Volume 255, 2020, <https://doi.org/10.1016/j.socscimed.2020.113000>.

Heinrich L & Gullone E (2006). The clinical significance of loneliness: A literature review. *Clinical Psychology Review* 26:695–718.

Hing, N., O'Mullan, C., Nuske, E., Breen, H., Mainey, L., Taylor, A., ... Rawat, V. (2020). The relationship between gambling and intimate partner violence against women (Research report, 21/2020). Sydney: ANROWS

Hing N, Russell A M T, Browne M; Rockloff M; Greer N; Rawat V, et al (2021). The second national study of interactive gambling in Australia (2019-2020).

Holt-Lunstad J, Smith T, Baker M, Harris T & Stephenson D (2015). Loneliness and Social Isolation as Risk Factors for Mortality: A Meta-Analytic Review. *Perspectives on Psychological Science* 10:227–37.

House of Representatives Standing Committee on Social Policy and Legal Affairs (2023) You win some, you lose more.

https://www.aph.gov.au/Parliamentary_Business/Committees/House/Social_Policy_and_Legal_Affairs/Onlinegamblingimpacts/Report

Jaktar U & Jenkinson R (2019). Submission to House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into Age Verification for Online Wagering and Online Pornography. Accessible at

https://www.aph.gov.au/Parliamentary_Business/Committees/House/Social_Policy_and_Legal_Affairs/Onlineageverification/Submissions

Kidd, S. A. (2004). "The Walls Were Closing in and We Were Trapped": A Qualitative Analysis of Street Youth Suicide. *Youth and Society*, 36, 30-55. <http://dx.doi.org/10.1177/0044118X03261435>

King D & Delfabbro P H (2018). Predatory monetization schemes in video games (e.g. 'loot boxes') and internet gaming disorder. *Addiction*, 10.1111/add.14286

Kristiansen S & Severin M C (2020) Loot box engagement and problem gambling among adolescent gamers: Findings from a national survey. *Addictive Behaviors*. 103, 106254.
doi.org/10.1016/j.addbeh.2019.106254

Letts S (2018). Chart of the day: Are Australians the world's biggest gambling losers? You can bet on it external site opens in new window. ABC News. 20 November.

Livingstone, C. (2017). How electronic gambling machines work (AGRC Discussion Paper No. 8). Melbourne: Australian Institute of Family Studies

Lubman, D, Manning, V, Dowling, N, Rodda, S, Lee, S, Garde, E, Merkouris, S & Volberg, R. (2017). Problem gambling in people seeking treatment for mental illness, Victorian Responsible Gambling Foundation, Melbourne

Mance, P. (2018). Is Australia experiencing an epidemic of loneliness? Findings from 16 waves of the Household Income and Labour Dynamics Survey.

https://relationships.org.au/pdfs/copy_of_Anepidemicofloneliness20012017.pdf

McClelland, H., Evans, J. J., Nowland, R., Ferguson, E., & O'Connor, R. C. (2020). Loneliness as a predictor of suicidal ideation and behaviour: a systematic review and meta-analysis of prospective studies. *Journal of Affective Disorders*, 274, 880-896.

Mills, R. S. L. & Rubin, K. H. (1998). Are behavioural and psychological control both differentially associated with childhood aggression and social withdrawal? *Canadian Journal of Behavioural Science / Revue canadienne des sciences du comportement*, 30(2), 132–136. <https://doi.org/10.1037/h0085803>

Morgan, A. & Boxall, H. (2022) Economic insecurity and intimate partner violence in Australia during the COVID-19 pandemic (Research report, 02/2022). ANROWS.

Mushtaq, R. (2014). Relationship Between Loneliness, Psychiatric Disorders and Physical Health? A Review on the Psychological Aspects of Loneliness. *Journal of Clinical and Diagnostic Research*

Nangle, D W, Erdley, C A, Newman, J E, Mason, C A & Carpenter, E M (2003) Popularity, Friendship Quantity, and Friendship Quality: Interactive Influences on Children's Loneliness and Depression, *Journal of Clinical Child & Adolescent Psychology*, 32:4, 546-555, DOI: 10.1207/S15374424JCCP3204_7

Neal, P, Delfabbro, P & O'Neil, M (2005) Problem Gambling and Harm: Towards a National Definition

O'Brien, K & Iqbal, M (2019). *Extent of, and children and young people's exposure to, gambling advertising in sport and non-sport TV*, Victorian Responsible Gambling Foundation, Melbourne.

<https://responsiblegambling.vic.gov.au/resources/publications/extent-of-and-children-and-young-peoples-exposure-to-gambling-advertising-in-sport-and-non-sport-tv-679/>

Pitt, H., McCarthy, S., Randle, M., Arnot, G., Daube, M., & Thomas, S. (2024) *"It's changing our lives, not for the better. It's important that we have a say"*. The role of young people in informing public health and policy decisions about gambling marketing. *BMC Public Health*. <https://doi.org/10.1186/s12889-024-19331-x>

Potenza M. N, Balodis, I. M., Derevensky, J., Grant, J. E., Petry, N. M., Verdejo-Garcia, A. & Yip, S.W. (2019) *Nature Reviews Disease Primers*. Gambling Disorder. 5(51)

Pressman S D, Cohen S, Miller G E, Barkin A, Rabin B S, Treanor J J. Loneliness, social network size, and immune response to influenza vaccination in college freshmen. *Health Psychol*. 2005 Jul;24(4):348. PMID: 15898866.

Productivity Commission (2010) Gambling. Report no. 50, Canberra.

Qu, L., Kaspiw, R., Carson, R., Roopani, D., De Maio, J., Harvey, J., Horsfall, B. (2021). National Elder Abuse Prevalence Study: Final Report. (Research Report). Melbourne: Australian Institute of Family Studies

Qualter, P., & Munn, P. (2002). The separateness of social and emotional loneliness in childhood. *Journal of Child Psychology and Psychiatry*, 43(2), 233–244. <https://doi.org/10.1111/1469-7610.00016>

QGSO (Queensland Government Statistician's Office), Queensland Treasury 2021. Australian gambling statistics, 36th edition, 1993–94 to 2018–19

Rockloff M, Russell A M T, Greer, N, Lole L, Hing N & Browne M (2020) Loot Boxes: Are they grooming youth for gambling?

Sakata K, Greer N, Boyle C M & Jenkinson R (2022) What do we know about the link between video gaming, gambling and harm?

Sakata, K & Jenkinson, R (2022) What is the link between video gaming and gambling? (Growing Up in Australia Snapshot Series, Issue 7). Melbourne: Australian Institute of Family Studies

Saunders, M. & Harrington, M. (2025) Discussion Paper: Teenage gambling in Australia: Rates of expenditure and participation among 12-19-year-olds.

Valtorta, N., Kanaan, M., Gilbody, S., Ronzi, S., & Hanratty, B. (2016). Loneliness and social isolation as risk factors for coronary heart disease and stroke: systematic review and meta-analysis of longitudinal observational studies. *Heart*, 102(13), 1009-1016

Wardle H & Zendle D (2021) Loot boxes, gambling, and problem gambling among young people: Results from a cross-sectional online survey. *Cyberpsychology, Behavior and Social Networking*. 24(4), 267-274 doi.org/10.1089/cyber.2020.0299

Wood, R. T. & Williams, R. J. (2011). A comparative profile of the internet gambler: Demographic characteristics, game-play patterns, and problem gambling status. *New Media & Society*, 13(7), 1123–1141. <https://doi.org/10.1177/1461444810397650>