



18 November 2022

Committee Secretary

House of Representatives Standing Committee on Social Policy and Legal Affairs

PO Box 6021

Parliament House

Canberra ACT 2600

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### **Inquiry into online gambling and its impacts on those experiencing gambling harm**

Responsible Wagering Australia (RWA) is the peak body for the Australian-licensed online wagering industry. Our members are Australia's major wagering service providers (WSPs): bet365, Betfair, Entain (Ladbrokes and Neds), PointsBet, Sportsbet and Unibet.

RWA and its members are committed to ensuring that Australia has the best conducted, socially responsible wagering industry in the world. RWA is committed to leading the industry and working with all stakeholders to continually improve consumer protections, without unduly restricting the enjoyment of the majority who gamble responsibly.

RWA appreciates the opportunity to provide a submission to the *Inquiry into online gambling and its impacts on those experiencing gambling harm*.

### **EXECUTIVE SUMMARY**

RWA and its members support a safe and responsible wagering industry that balances the enjoyment of its products with the need to protect the community. RWA's members take gambling harm seriously and support evidence-based measures to promote safe habits and reduce numbers of people experiencing gambling harm.

For example, in 2016 RWA established a Code of Conduct that included several measures - such as the prohibition on lines of credit and strengthening customer ID verification requirements which subsequently became incorporated into the National Consumer Protection Framework (NCPF). In the last 12 months RWA and its membership has invested more than \$30 million in safer gambling advertising, including in-stadia or digital assets

focusing entirely on a pro-active, responsible gambling messaging (e.g., 'Take A Break' or 'Set a Deposit Limit').

The NCPF itself is a significant, world-leading regulatory framework that RWA is fully committed to, with the remaining three measures out of ten (consistent gambling messaging, staff training and the National Self-Exclusion Register) due to be implemented by March 2023. We continue to work collaboratively with the Commonwealth and state governments to deliver this.

RWA members are part of one of the world's strictest wagering regulatory environments. RWA's members are subject to over 17,000 pages of legislation and regulation nationally, whilst remaining accountable to 26 different regulatory bodies. There is a complex and multi-faceted framework of federal and state regulations which cover wagering advertising, broadcasting, anti-money laundering, counter-terrorism financing, company and corporate conduct, privacy, taxation, and communications.

RWA recognises that the wagering landscape is evolving and both industry and government need to remain agile and responsive in debating and developing evidence-based regulations. By ensuring that new regulatory measures taken are evidence-based rather than adopting a scatter-gun approach, government can avoid unnecessarily delays and bloated reforms that result in unworkable implementation.

RWA also continues to take other pro-active measures to ensure Australia has the best conducted, socially responsible wagering industry in the world. We are working to strengthen and standardise payment methods across the industry by pro-actively advocating for a ban on all credit card use in online wagering, and will continue to work with the Commonwealth Government to progress this initiative.

Further to national reforms such as the NCPF, continuing scrutiny must be placed on the entire Australian wagering sector, including anonymous over-the-counter betting at retail outlets. Wagering and any associated harms with all these forms are not diminished by virtue of the method or medium through which the activity is conducted, and risks are not the exclusive domain of the online wagering sector. A comparatively weaker regulatory model for retail wagering does not support long-term community or responsible gambling outcomes, as at-risk people will simply migrate to forms of wagering that are easier to access or offer less restrictive consumer protections.

In contrast to other forms of gambling, online wagering allows for greater player safety monitoring and customisation through the rich data sets available for individual customers. It is the strong view of RWA members that the use of data is the critical enabler in the development of sustainable consumer protections. Data can be used to verify individual customers and mandate traceable forms of payment as well as allowing an individual to commit to spending limits which is a unique strength of online wagering customer safety compared to some other forms of gambling.

RWA notes that Australians are increasingly at risk of illegal offshore operators due to the ease of access to illegal offshore wagering sites, which are unregulated by Australian authorities and do not offer any of the consumer protections present amongst Australian-licensed WSPs. The 2021 Interactive Gambling Study found that 47.1% of those surveyed had used an illegal offshore gambling site in 2019, whilst H2 Gambling Capital estimated forgone tax revenue as a result of the offshore market at \$250 million in 2017, a figure that would likely have now significantly increased as the tax burden on the onshore industry has grown since.<sup>1</sup>

Lastly, RWA supports advertising as a legitimate means for our members to offer services and products in a well-regulated environment. The economic contribution of our members is \$2.89 billion of direct spending, the beneficiaries of which include racing and sporting codes and therefore grassroots community funding. Although our members never target advertisements at minors and there are strict age verification procedures in-place to prevent minors opening and operating accounts with our members, RWA acknowledges community sentiment in relation to gambling advertising and is committed to being a constructive participant in a conversation about sensible reforms which appropriately balance community expectations with the ability to promote a product which is safely enjoyed by millions of Australians.

In order to strengthen consumer protections and address people experiencing gambling harm across the wagering landscape, RWA makes the following recommendations:

- 1. The Committee note the existing strong protections afforded to customers of online wagering through mandated and voluntary consumer protection tools, including the use of data;**
- 2. The Committee note RWA's support of furthering of education and assistance programs to consumers to access support when needed;**
- 3. The Committee consider strengthening and standardising payment methods across the wagering industry, supporting an industry-led ban on credit card deposits and the prioritisation of traceable payment methods.**
- 4. The Committee explore future advertising approaches that are evidence-based and sustainably support wider downstream industries (e.g. sport, racing, media)**
- 5. The Committee support the full implementation of the remaining elements of the NCPF, with a focus on promoting national consistency for wagering regulation and ensuring academic evaluation of the effectiveness of minimum protections already in place including those associated with the NCPF.**

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<sup>1</sup> H2 Gambling Capital, *Australian Offshore Interactive Wagering Market Study 2019*

## BACKGROUND

### Economic Contribution of the Online Wagering Industry

RWA's members are significant contributors to the Australian economy, through direct taxation revenue collected by governments at both a Commonwealth and state and territory level, as well as through direct and indirect economic contributions to Australian sporting industries and their wider communities.

RWA's members contributed \$5.8 billion directly and indirectly into the Australian economy in the financial year ending June 2022. During the same period, RWA members sustained over 32,000 jobs.<sup>2</sup>

RWA's members paid more than \$1.9 billion in taxes and levies in the 2022 financial year. More than 51 cents in every dollar of corporate bookmaker revenue is paid solely as tax in Australia, prior to any other business expense incurred as part of operating a sophisticated technology operation, including employee entitlements, technology investments, energy costs and property leases. This continues to increase – total taxes and levies have increased by 68% between FY19 and FY22, from \$638 million to \$1.9 billion.

Australian-licensed WSPs are subject to taxation arrangements that apply to all Australian businesses, including Corporate Income Tax, Goods and Services Tax (which is absorbed by RWA members who, unlike other businesses, do not pass it onto customers) and other state taxes such as payroll tax. However, WSPs are also subject to several wagering-specific taxes imposed at a state level, including;

- Point of consumption tax (POCT) - this tax is payable by all Australian-licensed wagering operators on the net wagering revenue derived from wagers, or on facilitated wagering activity, of residents of any given state. In this way, the tax is levied based on the location of the customer rather than the location of the product.
- Product fees paid to racing and sporting bodies – This levy is paid to the product owner for the right to offer wagering opportunities on their product.
- Other WSP specific fees and levies, such as that associated with the cost recovery for the National Self-Exclusion Register (NSER).

Last year, RWA members paid \$650 million directly to the Australian racing industry, supporting trainers, jockeys and other participants across all tiers of racing including country racing. Between 2017/18 and 2020/21 RWA members increased their returns to the racing industry by 130%.

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<sup>2</sup> IER, Economic contribution of RWA Members 2022

## **The Australian gambling landscape**

It is important to note that online wagering is only one form of gambling that exists in Australia. Race betting (including bets placed with land-based retail options that RWA members are prohibited from offering) makes up 16.8% of total gambling prevalence, whilst sports betting sits at 9.6%. Comparatively, lotteries make up 41.5% of overall prevalence whilst electronic gaming machines make up 16.4%.<sup>3</sup>

Furthermore, the most recent mass study into online wagering users using University of Melbourne Household, Income and Labour Dynamics in Australia (HILDA) data found that 1% of its sample could be categorised as problem gamblers using the Problem Gambling Severity Index (PGSI) index. This trend remains steady – a 2011 study of similar magnitude found that 1% of those that wagered were considered problem gamblers using the same index.<sup>4</sup>

The claims that “the rate of problem gambling for online gamblers is three times higher than other forms” are highly misleading<sup>5</sup>. Such claims conflate ‘online gamblers’ with ‘online wagering or online gambling’. In the Central Queensland University study that these claims are derived from, the definition of an ‘interactive gambler’ is very broad and includes people who gamble online and in land-based venues. For example, an individual who buys an online lottery ticket once a month but spends large sums of money on poker machines would be classified as an ‘interactive (or online) gambler’ for the purposes of the study, significantly skewing the gambling harm metrics. Tellingly, the report identifies that the most harmful product for interactive (online) gamblers are poker machines.

## **The Presence and Risks posed by Illegal Offshore Wagering Operators**

With the ever-present risk of Australian customers migrating to illegal offshore products, RWA encourages the Commonwealth to consider ways to better combat illegal offshore gambling. Whilst disruption is an important part of addressing illegal offshore wagering, ensuring that Australia has a viable and competitive Australian-licensed wagering industry assists in combatting the prevalence of offshore alternatives.

The 2021 Interactive Gambling Study found that 47.1% of those surveyed had used an illegal offshore gambling site in 2019<sup>6</sup>, evidently exposing many Australian consumers to a greater degree of risk through the lack of consumer protections applied to this market compared to Australian-licensed onshore operators. Key drivers of consumers to these illegal offshore

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<sup>3</sup> Central Queensland University, *The Second National Study of Interactive Gambling in Australia (2019-20)*

<sup>4</sup> University of Adelaide, *Fifth Social and Economic Impact Study of Gambling in Tasmania 2021 Volume 2*, 2021

<sup>5</sup> Central Queensland University, *The Second National Study of Interactive Gambling in Australia (2019-20)*

<sup>6</sup> Central Queensland University, *The Second National Study of Interactive Gambling in Australia (2019-20)*

products include better pricing and lack of product restrictions including online in-play sports betting (the placing of a wager after the event has commenced)<sup>7</sup>.

We believe, consistent with recommendation of the 2017 Review of Australia's Sports Integrity Arrangements (Wood Review) that sports integrity will be assisted greatly by allowing online in-play betting on sport as it will mean that Australian customers are betting with Australian operators who provide betting data to Australian sporting bodies and, where necessary, law enforcement agencies. Further, Australian customers betting with Australian operators also have the benefit of Australian consumer protection measures.<sup>8</sup> This would also reduce money-laundering and problem gambling risks whilst also removing a significant driver of consumers to illegal offshore wagering sites.

In addition to not offering any consumer protections for Australian consumers, illegal offshore operators do not) pay Commonwealth and state/ territory taxes or product fees to Australian racing and sporting controlling bodies.

RWA strongly encourages the Commonwealth Government to continue working to address the availability and access to illegal offshore providers by Australian consumers, to further ensure consumers are utilising services provided by Australian-licensed wagering operators. This will help ensure greater numbers of Australians are covered by existing and future consumer protection measures.

## **SUBMISSION RECOMMEDATIONS**

### **1. The Committee note the existing strong protections afforded to customers of online wagering through mandated and voluntary consumer protection tools, including the use of data;**

In this section, some of the tools already in place across RWA member platforms are outlined including those which were developed from the rich data sets available to WSPs, and which have shown to be effective in minimising harm for consumers.

RWA and its members note the significant differences in consumer protections across different forms of gambling. A substantial number of consumer protections exist in the online wagering space which are not in place for land-based betting. A detailed summary of the consumer protection tools mandated by governments through the NCPF is listed at recommendation 5

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<sup>7</sup> Central Queensland University, *The Second National Study of Interactive Gambling in Australia (2019-20)*

<sup>8</sup> Department of Health, *Report of the Review of Australia's Sports Integrity Arrangements (Wood Review)*



below, however in many respects RWA members go beyond the mandated requirements in providing consumer protection tools to their customers.

Pursuant to existing regulatory requirements, WSPs are required to have policies and procedures in place to identify customers displaying signs of gambling harm and respond appropriately. RWA members comply with these requirements through the use of sophisticated data models that monitor individual customer activity and identify red flag behaviours of gambling risk.

The personalised data driven approach to identifying customers at risk of harm is necessary because no two customers are identical or behave the same, and no single indicator can determine risk across all customers

Areas that our members monitor include but are not limited to:

- Changes in customer's daily average deposits (by volume or value), with additional focus for new customers (i.e. first month of activity)
- Changes in level of gambling spend, gambling intensity and/or time spent gambling
- Failed payment alerts or customers cancelling large pending withdrawals

As RWA members know their customers due to strict identification requirements, they are able to provide personalised interactions with customers and where necessary, implement controls at the individual account level which can have far more impact than general restrictions. These personalised interactions can take the form of an email, a phone call and/or temporary or permanent account restrictions.

While ultimately customers will choose whether and how they respond to a customer safety interaction, they often result in a customer taking advantage of the range of tools available to them to better control their gambling or plant the seed to take such action in the future.

There is significant evidence to demonstrate that industry developed tools, such as time-outs, exclusions and deposit limits, are effective in creating change in customer wagering behaviour and limiting risk of the development of people experiencing gambling harm behaviours.

A 2020 analysis of RWA member data regarding consumer protection tools titled *Patterns in the Use and Effectiveness of Consumer Protection Tools* by the University of Sydney Brain and Mind Centre found that users who adopted deposit limits in turn made lower median deposits into their wagering accounts annually. Furthermore, the study found that those users who adopted a timeout or self-exclusion on their account were customers who wagered more frequently on average and had higher average bets<sup>9</sup>. These findings reinforce the effectiveness of targeting tools to those who are more at risk of experiencing gambling harm.

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<sup>9</sup> University of Sydney Brain and Mind Centre, *Patterns in the Use and Effectiveness of Consumer Protection Tools*, 2020

In addition to the promotion of consumer protection tools by members, RWA itself recently conducted its own campaign to promote the use of deposit limits amongst individuals who are all already customers of WSPs. Post campaign qualitative analysis found that the advertisements were responsible and successfully delivered a clear and concise message. Statistical work is currently ongoing to determine the degree of customer adoption of deposit limits tools as a result.

RWA supports the development of policies that encourage a data driven and tailored approach to people experiencing gambling harm intervention, rather than generalised restrictions.

## **2. The Committee note RWA's support of furthering of education and assistance programs to consumers to access support when needed;**

RWA recognises the valuable work that financial counsellors and other organisations undertake in the community and the importance of adequate funding for these groups. In this spirit, RWA has joined with a coalition of partners from across the banking, finance, insurance, telecommunications, and energy sectors to provide an initial funding contribution to help financial counsellors provide free, independent, expert advice to those experiencing financial hardship. This work, which is currently ongoing in collaboration with the Department of Social Services is another example of our industry's ongoing collaboration with government.

RWA continues to conduct research into issues concerning player safety and protection, including studies into the prevalence of the illegal offshore wagering industry and working collaboratively with research institutions to evaluate the effectiveness of consumer protection tools.

RWA has also been a strong supporter of a National Self-Exclusion Register (now named BetStop). As part of industry's adoption of BetStop, it will be required to promote it to customers in all direct communications, ensuring that customers are aware that they have the option of an industry wide exclusion.

RWA is also open to participating in other initiatives both government and non-government to introduce and improve education programs promoting responsible gambling behaviour and encouraging the uptake of consumer protection tools.

We believe there is benefit in industry's involvement in education campaigns so that they can be appropriately targeted based on individual user profiles. As mentioned above, both RWA and its members run campaigns promoting the adoption of consumer protection tools and promoting responsible gambling behaviour amongst users. Recent campaigns have promoted the setting of deposit limits, timed and permanent self-exclusion options and other operator-specific tools.



**3. The Committee consider strengthening and standardising payment methods across the wagering industry, supporting an industry-led ban on credit card deposits and the prioritisation of traceable payment methods.**

Research has shown that “cash is becoming a niche payment instrument”<sup>10</sup> which presents an opportunity for payment processes to be strengthened in all forms of wagering.

As customer preferences and community expectations continue to evolve, governments, financial institutions and the industry need to collaborate on standardising payment methods, taking into account privacy protection and player safety.

Further, research has shown that *“In contrast to cash payments, digital transactions contain features that can be effectively used to advantage as a means to prevent or detect excessive expenditure among individuals. As opposed to cash, electronic transactions can be readily tracked, and expenditure patterns made available through player activity statements. Digital payments enable automated play monitoring improving detection of indicators of risky gambling and real time interventions...”*<sup>11</sup>

RWA believes that a more mature approach to payments across the wagering industry, that still complies with anti-money laundering obligations is an important next step in driving greater integrity in the industry. RWA remains open to working with government and financial institutions regarding future progress in this area.

RWA has previously announced its support for an end to the ability of Australians to use credit cards as a deposit mechanism for wagering accounts. This announcement was consistent with RWA’s long-held position that customers should only wager with their own clear funds and followed our previous strong advocacy for the prohibition on offering lines of credit to customers. RWA has been working proactively with the Commonwealth Government on possible implementation options.

**4. The Committee explore future advertising approaches that are evidence-based and sustainably support wider downstream industries (e.g. sport, racing, media)**

Advertising by RWA members is tightly regulated at both a Commonwealth and state/ territory level. There are strict rules when it comes to wagering ads designed to limit exposure particularly during children’s programs, and we have outlined the major restrictions below for the benefit of the Committee.

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<sup>10</sup>Gainsbury & Blaszczyński, *Digital gambling payment methods: harm minimization policy considerations* 2020

<sup>11</sup>Gainsbury & Blaszczyński, *Digital gambling payment methods: harm minimization policy considerations* 2020

Restrictions on commercial free-to-air television programs (Cwth)

- During programs that are classified G, C and P, gambling ads are not permitted from 6am to 8.30am and 4pm to 7pm.
- During other programs principally directed to children, gambling ads are not permitted between 5am and 8.30pm

Rules that apply at all times (Cwth)

Any wagering advertisement must ensure that anyone who represents a gambling organisation is;

- clearly identified
- not part of, or a guest of, the commentary team
- not at (or appear to be at) or around the venue

- no gambling advertising or promotion of odds is allowed during play
- no promotion of odds is allowed during breaks in play (such as half time)
- No gambling advertising or promotion of odds is permitted from 5 minutes before the published scheduled start of play, until 5 minutes after play, including during breaks.
- no promotion of betting odds by commentators and representatives from gambling services (that are, or appear to be at the venue) are

Broadcasters are not allowed to promote any gambling content that is socially irresponsible. For example, the content must not:

- target children or suggest they are participating in betting or gambling
- exaggerate how likely someone is to be successful
- make a connection between betting or gambling and alcohol

	<p>allowed from 30 minutes before play begins until 30 minutes after play</p>	
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In addition to Commonwealth restrictions on advertising broadcasts, RWA members are also regulated at a state and territory level regarding the placement, content and timing of wagering advertising. For example, advertising must include responsible gambling messaging and there are prohibitions on the presentation of wagering as a source of financial betterment, prohibitions on alcohol consumption in wagering ads as well as restrictions on direct marketing to customers

RWA members also comply with the Australian Association of National Advertisers (AANA) Wagering Code of Conduct (which applies to wagering operators regardless of AANA membership), which provides a range of consumer protections as part of wagering advertising including that it must not;

- be directed primarily to minors;
- portray people under the age of 25, unless in an incidental role;
- portray or encourage the consumption of alcohol in combination with wagering;
- state or imply a promise of winning;
- state or imply a link between wagering and sexual success or enhanced attractiveness;
- portray or encourage wagering as a means of relieving financial difficulties;
- portray or encourage excessive participation; and
- portray or encourage peer pressure to wager or disparage abstention

As mentioned above, RWA and its members individually have also undertaken advertising campaigns promoting the use of consumer protection tools.

It is also important to note that advertising is a key differentiator for licensed, onshore operators in comparison to offshore operators. The ability to advertise is a key differentiating factor between the Australian-licensed industry, and illegal offshore operators and broad-stroke prohibitions on onshore advertising may give unintended advantages to these illegal operators.

Nevertheless, RWA acknowledges community sentiment in relation to gambling advertising, and is committed to being a constructive participant in a conversation about sensible reforms which appropriately balance community expectations with the ability to promote a product which is safely enjoyed by millions of Australians. National consistency is essential to the success of such reform and we look forward to ongoing consultation with the Commonwealth and state and territory governments about how best to achieve change, whilst recognising the

economic impact upstream and downstream to affected parties, including media, sport and racing partners.

**5. The Committee support the full implementation of the remaining elements of the NCPF, with a focus on promoting national consistency for wagering regulation and ensuring academic evaluation of effectiveness of minimum protections already in place including those associated with the NCPF.**

RWA has been a chief advocate of the development and implementation of the NCPF – a ground-breaking national agreement of wagering reforms targeted at improving consumer protections for interactive wagering products.

The NCPF has introduced prohibitions on lines of credit offered to wagering customers and the use of payday lenders, as well as strengthening customer ID verification requirements and prohibitions on the provision of inducements amongst other measures. These measures were initially part of previous RWA codes of conduct on its members prior to codification in legislation.

In contrast to other forms of gambling, online wagering allows for greater transparency between operators and customers, with users being able to access their wagering information on-demand, whether it be through the NCPF mandated monthly activity statement measure or other means.

The NCPF has also implemented several other measures targeted at increasing consumer protections for customers of online wagering services. These include but are not limited to;

- Enhanced Customer verification
  - Customer ID must now be verified within 72 hours. If a person is verified as under 18 years of age, all deposited funds must be returned and the account immediately closed.
- Restrictions on inducements
  - Offers of credit, vouchers or rewards as an incentive to open an account are prohibited
  - Winnings from complementary betting credits or tokens (i.e bonus bets) must be able to be withdrawn without being subject to turnover requirements
  - All direct marketing must only be sent to customers who have provided their express consent to receive this material. Any customer that unsubscribes must no longer receive direct marketing material.
- Voluntary Opt-out pre-commitment scheme

- A voluntary pre-commitment scheme must be easily accessible to customers and with prompts to set deposit limits provided to customers during the sign-up process.
- A request by a customer to increase their deposit limit must not be applied until 7 days after the request is received.
- Monthly activity statements
  - While a customer has an active betting account, an interactive wagering service provider must provide an activity statement to the customer via email, on a monthly basis.
  - A customer is deemed to have an active betting account if the customer has made a transaction during that month
  - Activity statements must include segmented information clearly showing monthly information on betting activity and account transactions about:
    - amount spent
    - wins and losses
    - number of bets placed
    - overall net win/loss for the specified period of the activity statement
    - opening and closing balances
    - deposits and withdrawals
    - the account balance
    - a column graph to illustrate wagering activity comparing amount spent against net result over time for the last 6 months (cumulative), and shows a clear comparison tracking to the same time from the last year
    - links and information on support services and safe gambling messaging that promotes available consumer protection tools.

In addition, RWA members are working with governments to implement new consistent gambling messages. RWA agrees that the currently mandated 'gamble responsibly' tagline is stigmatising and no longer fit for purpose. Seven new taglines will be introduced alongside a call-to-action text "for free and confidential support call 1800 858 858 or visit [gamblinghelponline.org.au](http://gamblinghelponline.org.au)."

These new messages will be displayed on all forms of advertising and will replace existing taglines including 'gamble responsibly.' RWA continues to work collaboratively with the Commonwealth and state governments to deliver this measure.

Finally, RWA members will soon implement new staff training requirements and the NSER, an important harm minimisation measure long supported by RWA. Known as BetStop, this allows an individual to place themselves on the register which is then made available for wagering operators to check against. RWA members will be required to promote BetStop through their websites, apps and marketing.

Whilst the NCPF is driven at a national level through the Commonwealth Department of Social Services, in practice, most measures are executed and enforced by State and Territory jurisdictions.

The effect of this amalgamation of jurisdictional authorities is that there can be inconsistencies in application. These inconsistencies create a significant compliance and risk impact. For example, to implement the three remaining NCPF measures (8,9 and 10) as outlined earlier, major changes are required to RWA members' platforms, technology, people capabilities, customer communications, operating models and risk-management processes.

There have been issues with the technical implementation of some aspects of Activity Statements, BetStop (including technical feasibility and testing with the operator) and Consistent Gambling Messaging (in regard to practical limitations of media and advertising products).

While many of these practical and technical issues are being worked through, a collaborative approach to implementation of policy and regulatory proposals, including early consultation will lead to the best outcomes for government, industry and consumers.

It is also essential that the effectiveness of these measures is continually reviewed and refined to create a significant empirical evidence base to inform future reforms.

RWA will continue to work closely with all jurisdictions to achieve the best outcomes for the community, as well as our members' customers. RWA would welcome the opportunity to discuss our submission further with Committee members and would also be pleased to facilitate a visit by the Committee to one of our member organisation's premises to see firsthand how a major Australian-licensed wagering service provider operates.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Justin Madden', written over a faint horizontal line.

**Hon Justin Madden AM**

**Chief Executive Officer**