

5 October 2023

s22(1)(a)(ii)

Director Broadcasting and Gambling Regulation Section /
Media Industry and Sustainability Branch
Online Safety, Media and Platforms Division
GPO Box 594
Canberra, ACT 2601

Via email: s22(1)(a)(ii)@infrastructure.gov.au

CONFIDENTIAL

Dear s22(1)(a)(ii)

Please see below the National Rugby League's response to your request for further information to inform the Government's consideration of the House of Representatives Standing Committee on Social Policy and Legal Affairs inquiry into online gambling and its impacts on those experiencing gambling harm.

We have provided as much information as was possible within the limited timeframe. If further analysis and modelling is required by the department, we will require an estimated 8 weeks to engage a third party to carry this out on our behalf.

I ask that all information provide below remain confidential and it must not be shared beyond the Minister's office and Department or used for any other purpose but to inform this process.

If you need further information, please do not hesitate to contact me on s47F s47F@nrl.com.au or s47F

Your sincerely,

s47F

Executive General Manager – Partnerships
National Rugby League

s47(1)(b)

Additional Considerations

The National Rugby League remains fully supportive of the following regulations and measures, that are proposed or are already in place, to minimise gambling harm and exposure of gambling advertising to young people.

The National Consumer Protection Framework

With the final element of the National Consumer Protection Framework, the self-exclusion register being implemented on 21 August, the National Rugby League remains confident that this measure, alongside the consistent gambling messaging and further training for wagering staff, will go a long way in minimising gambling harm for vulnerable people.

Wagering Advertising Black-Out Regulations

The National Rugby League is supportive of and believe the current wagering advertising black-out regulations adequately address the risk of exposure of wagering advertising to young people.

These restrictions have existed since March 2018 and apply to the broadcast of all gambling advertisements, including betting-odds, during live sporting events on free-to-air TV, commercial radio and online service providers. The restrictions include:

- Gambling ads cannot be played during and from five minutes before to five minutes after a live sporting event
- 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 promotion of betting odds by commentators and representatives from gambling services (that are, or appear to be, at the venue) are allowed from 30 minutes before play begins until 30 minutes after play.
- 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.

Further to the above, the National Rugby League is supportive of additional measures that the wagering industry has proposed to further protect vulnerable people and encourages the government to implement them across the entire industry. These include:

A Real Time Intervention Tool

Sportsbet have developed a Real Time Intervention tool which is currently being implemented across its customer base. RTI uses artificial intelligence technology to develop a unique risk profile of each customer to predict what that customer's daily depositing range would be. When a customer attempts a

deposit higher than what the model predicts would be normal for that customer, RTI triggers a safer gambling intervention, before the deposit occurs. This tool therefore aims to operate as harm prevention rather than simply harm minimisation. RTI allows Sportsbet to monitor customers' activity and intervene quickly when they identify customers who may be at risk of developing problems with their gambling.

A data-driven approach represents a clear advantage over blanket, product-based restrictions which do not recognise the individual behaviours of customers; and subjective monitoring of physical behaviours, to the limited extent they can be effectively monitored by one gambling manager (or retail betting operator) in a physical environment with multiple players at the same time. Furthermore, it provides regulators with clear, auditable evidence of implementation of safer gambling interactions. The NRL believes Sportsbet's RTI tool should be rolled out across all online wagering platforms.

Reform Funding Model

The funding model for any new reforms should avoid placing additional pressure on the commercial viability of the wagering sector. As such, it has been suggested that the Point of Consumption Tax should be the source of funding, either by way of the state-based tax being replaced by a new Federal tax implemented by a central regulatory body or the states each pay a portion of the POCT that has been collected to fund the new reforms.