



Authority Secretariat  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

**Re: Submission on the ACMA's Compliance Focus Areas for 2024-25**

Dear Secretariat

Responsible Wagering Australia (RWA), as the peak body representing the Australian licensed online wagering sector, appreciates the opportunity to contribute to the Australian Communications and Media Authority's (ACMA) consultation on compliance priorities for the 2024-25 financial year. RWA and its members are committed to promoting a safe and responsible online wagering environment in Australia.

RWA and its members acknowledge the importance of minimising gambling harm and support the ACMA's focus in this area as part of its current priority compliance areas for 2023-24. Our members support targeted and nuanced policies that balance the need for effective consumer protection with the enjoyment of safe and responsible wagering enjoyed by the vast majority of adults who enjoy a punt. RWA and its members are committed to advancing and promoting the use of responsible gambling through initiatives including but not limited to self-exclusion tools, deposit limits, and real-time messaging.

RWA appreciates the ACMA's commitment to setting clear compliance priorities and welcomes ongoing collaboration to ensure a safe and responsible online wagering environment in Australia. In light of the consultation paper's invitation for comments, RWA wishes to highlight the following area as critical for the ACMA's focus in 2024-25:

**Continued Efforts to Combat Illegal Offshore Wagering Providers**

The proliferation of illegal offshore wagering sites poses significant risks to Australian consumers, including through the lack of consumer protections and potential financial losses. RWA believes that addressing the challenges posed by illegal offshore wagering providers is crucial for protecting Australian consumers and ensuring the integrity of the wagering industry.

Illegal offshore operators frequently change tactics and develop new methods to circumvent regulations, making it imperative for the ACMA to continuously monitor compliance and adjust its strategies accordingly.

#### *Advertising by Offshore Wagering Providers*

RWA supports tougher restrictions on wagering advertising laws to apply uniformly to those wagering providers operating online, and to those wagering operators operating in land based or retail settings. In that context, advertising to Australian consumers by illegal offshore wagering providers and providers not licensed in Australia is of material concern to RWA and its members; this practice should also be of material concern to the ACMA.

In recent times, RWA has noticed a proliferation of illegal offshore wagering provider advertising including through sponsorship on jerseys of international sporting teams participating in matches on Australian soil such as the West Indies cricket side which carried the 'Dafabet' logo. RWA also notes that it has become common practice for Australian broadcasters to take international feeds which carry unlicensed offshore wagering provider advertising in a digital form. This type of advertising not only undermines the efforts of Australian-licensed operators to provide a responsible wagering environment and the benefit of being a licensed onshore wagering service provider, but it risks providing Australian consumers with a false sense of security regarding these providers. We urge the ACMA to take action including pursuing illegal gambling advertising directly and working with international and local partners to address and reduce the visibility of such advertising to Australian audiences.

#### *Website Blocking*

RWA commends the ACMA's efforts in working with Internet Service Providers (ISPs) to block illegal offshore gambling websites and encourages the continuation and expansion of these efforts to mitigate their accessibility and impact on Australian consumers. Blocking access to these sites is a critical step in protecting Australian consumers from potential harm.

The evolving digital landscape requires ongoing compliance monitoring by the ACMA to counteract emerging threats efficiently. The ACMA's role in coordinating with ISPs, family-friendly filter providers, and other stakeholders to block access to illegal offshore wagering sites is vital in preserving a safe online environment for Australians. We note the need for improved effectiveness in current website blocking approaches given the apparent ease of blocked websites to quickly re-emerge and suggest leveraging advanced technology to enhance these efforts.

RWA has noted that in the last ACMA media release (dated 19 March 2024) regarding the blocking of illegal offshore websites, by the time of publishing the media release, 100 per cent of the sites listed in the announcement (all eight sites) were back up and running; in effect resulting in the ACMA's announcement unintentionally becoming a pseudo advertisement for illegal sites.

*Importance of Consumer-Focused Education*

In parallel with compliance and enforcement actions, RWA supports the ACMA's position on Government-led consumer-focused education to raise awareness about changes such as the incoming prohibition of credit cards. RWA also supports Government-led education about the risks associated with illegal offshore providers. Informing Australian consumers about identifying and avoiding unlicensed operators plays a crucial role in safeguarding them from potential harms and the lack of consumer protections. Initiatives aimed at educating the public about these risks can help deter engagement with risky offshore sites.

Thank you for considering our submission. RWA is committed to working alongside the ACMA and other stakeholders to support the selected focus areas effectively. RWA believes that a collaborative approach is essential for safeguarding the interests of Australian consumers and the integrity of the wagering industry. We look forward to the ACMA's decisions on the compliance focus areas for 2024-25 and are available to provide further information or engage in discussions as needed.

Should you require any further information about these issues, please contact Mr Mike Websdane, Head of Strategy and Operations, at [mike.websdane@responsiblewagering.com.au](mailto:mike.websdane@responsiblewagering.com.au).

Yours sincerely,



**Kai Cantwell**  
**Chief Executive Officer**

**22** March 2024