



GAMBLING HARM LIVED EXPERIENCE EXPERTS

Submission

Gambling Harm Lived Experience Experts (GHLEE) welcomes the opportunity to respond to the Interactive Gambling Amendment (Gambling Reform) Exposure Draft Bill 2026.

[GHLEE](#) formed with one clear goal: reduce and ultimately end gambling harm. We wish our organisation didn't have to exist and we will happily close down when gambling harm is no longer taking and destroying lives in Australia. We have the solutions as we are the ones who have the lived experience of the pain and suffering inflicted by the gambling industry in pursuit of their obscene profits. We believe that change is possible, and we are committed to making a difference.

GHLEE's initial comments on the Exposure Draft

GHLEE does not consider the proposed measures in this Bill as "reforms". Rather these are minor adjustments that fail to address the core issues of gambling harm from sports betting and other online gambling in Australia. *See Attachment One.*

Australians lose more money gambling per capita than any other country in the world, yet the Government's response continues to focus on incremental changes. We ask why the comprehensive package of recommendations contained within the House of Representatives Standing Committee's (the Murphy inquiry) "*You win some, you lose more*" report (the report) are not being implemented as advised? It is almost three years since this report was delivered and not a single reform has been implemented. This is extremely disappointing and disturbing given much of the report included sensible, phased recommendations that should have been implemented and having a positive impact for many Australians' lives by now.

The Government's response to this report can only be described as extremely disappointing and a complete betrayal of the people with gambling harm lived experience who gave their time to appear at this inquiry, including GHLEE members who tendered testimony. The very belated timing of the associated announcements and the failure to individually respond to each of the 31 evidence-based recommendations in the report can only lead us to the conclusion that this current Government has little interest in seriously tackling gambling harm.

The Government contends that it is taking "strong action" to protect Australians from online gambling harm, yet neither this Bill nor any announcements made by the Government do this in any meaningful way.

GHLEE understands the proposed Bill seeks to introduce several minor actions, including placing some restrictions on wagering advertising, stronger disruption powers against illegal gambling operators, enhancements to the BetStop National Self-Exclusion Register and action against certain online lottery products.



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GHLEE submits the below commentary on the proposed legislation, based upon a combined more than 100 years of lived experience of gambling harm in Australia among GHLEE's board membership.

Schedule 1—Restrictions on wagering advertising

Schedule 1 establishes new restrictions on wagering advertising, including banning wagering advertising content during live coverage of sports, alongside new requirements on online services to prevent restricted users (including under 18s) from accessing such content.

Any reduction in gambling advertising exposure is welcome; however, the proposed reforms fall significantly short of the recommendations of the Parliamentary Inquiry into Online Gambling and its impacts on those experiencing gambling harm.

The Committee was clear that partial advertising restrictions are unlikely to be effective and that comprehensive reform was required. Despite this, the proposed legislation retains numerous exemptions and carve-outs that will allow gambling advertising to remain deeply embedded throughout Australian society.

Australians will continue to be exposed to gambling advertising through:

- Continued advertising during mainstream television shows, including those pitched as “family viewing” – not the phased complete ban recommended in the Murphy report
- Continued advertising on radio outside of designated “school drop off/pick up” times, as if children aren’t in cars outside of these hours. They may be too young to go to school but will be in a car with brains like sponges listening to gambling being normalised, or have appointments or other reasons to be in the car outside these designated times
- Gambling advertising being permitted during “scheduled breaks”
- Direct marketing communications, which have proven to be not only extremely dangerous, but in some cases deadly
- Gambling sponsorship arrangements
- Digital and social media platforms
- Sporting commentary and gambling odds promotion
- Gambling-branded content
- Dedicated racing and wagering broadcasts

The practical effect is that gambling companies will continue to thrive and exploit us via widespread access to Australian consumers, including children and young people, despite overwhelming community support for stronger action. [Nationwide polling by YouGov found 77 per cent of Australians want a comprehensive gambling ad ban](#). Few social issues garner this much support, evidence that Australians are sick of their airwaves, newspapers and online experiences being dominated by inescapable advertising of a dangerous, adult product.

GHLEE is particularly concerned that the reforms continue to treat gambling advertising as a scheduling issue rather than a public health issue. Australia would not permit tobacco companies to advertise around the edges of major sporting events while claiming to have addressed tobacco harm. Yet this is effectively the approach being adopted with gambling.

Just shy of three years since the Murphy Inquiry recommended a phased pathway toward a comprehensive gambling advertising ban, the Government has instead proposed a partial restriction that leaves the vast majority of gambling promotion infrastructure intact.

The proposed changes therefore represent a significant departure from both the recommendations of the Murphy Inquiry and the expectations of many Australians who believed the Government would implement meaningful restrictions on gambling advertising.



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They address children and young people in the context of gambling harm *minimisation*, when it should be gambling harm *eradication*. It is unconscionable and unacceptable to use the term harm minimisation when we talk about children and young people in the context of gambling harm.

The Prime Minister said “Kids shouldn’t grow up thinking gambling and sport are the same thing. Because Australians love sport for the game, not the odds.” It is hard to take these statements seriously given the patently weak nature of the proposed reforms. What the Prime Minister says is in complete contrast to what his actions do.

This lack of action three years post the Murphy Report is particularly galling given how quickly the Federal Government moved to introduce a social media ban for children. This demonstrates that from a lived experience perspective, the continuation of gambling advertisements is often, at a minimum, a significant emotional trigger leading to increased anxiety and trauma for persons living with and recovering from gambling harm.

At worst, gambling advertising, and especially direct marketing including incentives to gamble, can cause people in recovery to gamble again, with the dangerous consequences that can come from this, including deaths by suicide, family breakdowns, family violence, poverty and homelessness and mental ill-health. In this respect, the Government is blatantly putting the interests of gambling companies ahead of its own citizens.

GHLEE is also concerned that people need to “opt out” of gambling advertising online or wherever else relevant. This should be changed to “opt in” for **all** gambling advertising. It should be a conscious decision to choose to have these ads and promotions in your feed, not the default.

In summary, the Section 1 proposal in its current iteration means Australians, including children, will continue to be exposed to gambling promotion despite overwhelming public support for a comprehensive ban on gambling advertising.

This Government is literally and frustratingly going against the wishes of the people who voted for them, and is also disrespecting the memory of Peta Murphy instead of honouring her.

Peta Murphy epitomised leadership, courage and conviction by seeing catastrophic harm and seeking to fix it. The Prime Minister has failed to display any of these traits in regards to gambling reform; he has failed to recognise gambling harm as a deadly public health issue; he has failed to recognise it as one of the leading causes of poverty in Australia, and all the policy and social wins that would result from reducing gambling harm; he has failed to show empathy for thousands of families destroyed by gambling harm; he has failed to address the myriad mental ill-health connections to gambling harm; and perhaps most sadly, he has failed in his duty as Prime Minister to put the health and safety of the people of Australia ahead of the ongoing predatory quests for obscene profits by industry.

These proposed changes do little in the way of addressing the 31 reforms recommended in the Murphy Report; in fact they are a drop in the ocean compared to the harm being caused. It is akin to only recommending social distancing during the pandemic, with no shutdowns or mask and vaccine mandates.

We know that tweaking around the edges does not and cannot work when it comes to public health.

Schedule 2—Disruption of illegal gambling services

Schedule 2 strengthens the framework for tackling illegal gambling services, including placing positive obligations on financial institutions and online services to prevent payments and access to illegal gambling services.

GHLEE supports stronger action against illegal gambling operators and welcomes any measures aimed at disrupting access to unlicensed offshore gambling services.

However, the emphasis placed on illegal gambling services risks creating a misleading narrative that illegal operators are the primary source of gambling harm in Australia. The overwhelming majority of gambling losses in Australia occur through legal, licensed and heavily promoted gambling products.

The gambling industry and Government frequently point to illegal offshore operators as the principal problem, yet at the same time there continues to be a catastrophic failure to address licensed gambling operators who repeatedly breach Australian laws, licence conditions and consumer protection obligations. *See Attachment Two.*

Recent years have seen numerous examples of licensed gambling operators being subject to regulatory investigations, penalties, enforcement action and adverse findings relating to:

- advertising breaches
- responsible gambling failures
- inducements
- anti-money laundering obligations
- customer protection failures
- BetStop breaches
- broader regulatory non-compliance.

Further, many online gambling companies in Australia are currently subject to multiple legal proceedings, regulatory and authority investigations and even coronial inquests.

Despite this, **the proposed legislation unfathomably contains absolutely no measures that strengthen accountability for licensed operators in Australia.**

Gambling harm is gambling harm regardless of whether it occurs through a licensed Australian operator or an illegal offshore platform.

From a lived experience perspective, individuals and families suffering gambling harm rarely distinguish between licensed and unlicensed operators. What matters is the financial devastation, mental health impacts, family breakdown, relationship harm, suicidality and social consequences that flow from excessive gambling.

GHLEE is also concerned that the positive obligations imposed on financial institutions are largely confined to illegal gambling transactions.

Banks possess sophisticated systems capable of identifying:

- fraud
- scams
- money laundering
- suspicious transactions, and
- financial vulnerability.

Yet this legislation stops short of requiring financial institutions to proactively identify and respond to severe gambling-related harm occurring through legal gambling channels, as recommended in the report.

This represents a significant missed opportunity to introduce meaningful consumer protections and earlier intervention mechanisms.

Schedule 3—BetStop

Schedule 3 enhances the framework governing the National Self-Exclusion Register (known as BetStop), responding to recommendations arising from the Statutory Review of BetStop, tabled in February 2026.

GHLEE welcomes any efforts to strengthen the National Self-Exclusion Register and supports measures designed to improve the operation and effectiveness of BetStop.

BetStop has the potential to be one of Australia's most important gambling harm reduction tools.

However, a self-exclusion system is only as effective as the compliance obligations and enforcement mechanisms that sit behind it.

GHLEE remains deeply concerned that the proposed reforms continue to rely heavily on industry compliance despite mounting evidence that some gambling operators have failed to meet their existing obligations.

Recent investigations have identified hundreds of breaches of BetStop requirements by licensed gambling operators. *See attachment two.*

These breaches are not administrative oversights. They represent failures of systems specifically designed to protect vulnerable individuals who have taken active steps to exclude themselves from gambling.

The proposed reforms fail to adequately address the fundamental question: what happens when gambling companies ignore their obligations?

At present, the answer appears to be very little.

Too often gambling operators are permitted to:

- negotiate enforceable undertakings
- commission independent reviews
- promise future compliance improvements, or
- absorb financial penalties as a cost of doing business.

GHLEE does not consider this to be an effective deterrent.

Financial penalties – paid from gambling revenue generated from customers – are not meaningful consequences for large gambling corporations unless they are not easily absorbed as a “cost of doing business”.

GHLEE wants to see strong deterrents that will actually work: at least one million dollars for a first offense, applied as a multiple if multiple offenses are found, and then escalated to tens of millions of dollars for subsequent offences. This is the only acceptable level of fine given these businesses turn over hundreds of millions, and even billions, every year. These fines need to reflect companies' turnover and the fact that gambling harm has life-changing and potentially life-ending impacts, especially for people who have reached a point that they are using the BetStop program.

GHLEE maintains that where serious breaches occur, particularly repeated breaches involving self-excluded customers, stronger sanctions must be available and used in addition to the above fines being applied.

GHLEE calls for:

- licence suspensions
- licence cancellations in serious cases
- executive accountability provisions
- personal financial penalties for senior executives
- public reporting of compliance failures, and
- criminal liability where egregious misconduct contributes to serious harm such as suicide attempts or completions.

We take meaningful measures, including criminal prosecutions, to ensure OH&S obligations are taken seriously in Australia, as we should. Yet we don't treat gambling harm with anywhere near such gravity despite academic research suggesting it leads to up to deaths by suicide every day. This is four times as many lives ended by gambling harm than the number of workplace deaths in Australia in 2025, which was 188 lives. Exploitation of workers or people by the gambling industry can both have avoidable but tragic consequences.

The effectiveness of BetStop ultimately depends not on the existence or promotion of the register itself, but on whether gambling companies genuinely fear the consequences of its breach. At present, there is little evidence that serious consequences are enforced for BetStop breaches, and thus the breaches continue with all of their potentially devastating impacts.

We refer to a recent Australian Communications and Media Authority (ACMA) investigation that found more than 500 breaches of national self-exclusion rules by Entain Group Pty Ltd (Entain), the parent company of gambling companies Ladbrokes AU and Neds AU. It should not take 500 breaches of BetStop for ACMA to pay attention let alone enforce these regulations. One breach is too many given the potentially life-ending consequences. See *attachment two*.

The following interview, entitled "[Hounded to Death](#)", is an illustration of how deadly BetStop breaches can be. Kate's brother died by suicide when he was 24. He left a note on his laptop that said "I am taking my own life because I am pathologically addicted to gambling". Kate shared her brother's story to expose the predatory and unlawful behaviour of Sportsbet. She calls for the Albanese Government to introduce a full ban on gambling advertising saying "it's too late for my family, but it's not too late for others".

Schedule 4—Online lottery products

Schedule 4 prohibits online keno and foreign matched lotteries and clarifies the definition of trade promotion gambling services.

GHLEE supports measures aimed at restricting harmful and emerging online lottery products, including the prohibition of online keno and foreign matched lottery products.

These products have increasingly blurred the distinction between traditional lotteries and higher-risk gambling products.

However, GHLEE is concerned that the reforms focus on a relatively small segment of the gambling market while leaving the largest drivers of gambling harm largely untouched.

The proposed restrictions do not address:

- online wagering products
- sports betting
- racing betting
- gambling inducements
- VIP programs
- loyalty schemes, or
- unlimited gambling expenditure.

As a result, the practical harm reduction impact of these reforms is likely to be modest when assessed against the broader Australian gambling landscape.

While online lottery reforms may address specific product risks, they do little to address the structural factors driving Australia's gambling harm public health crisis.

Most significantly, the legislation avoids the introduction of mandatory, binding loss limits.

Australians can continue to lose unlimited amounts of money through licensed online gambling products despite overwhelming evidence of harm and the availability of stronger protections in comparable international jurisdictions.

GHLEE therefore considers Schedule 4 to be a step in the right direction but is concerned that it does not address the primary sources of gambling-related harm experienced by Australian individuals, families and communities.

Failings in the Bill

GHLEE believes the Bill fails to address several of the most significant recommendations arising from the Murphy Inquiry, including:

- The establishment of an independent national gambling regulator
- The appointment of a dedicated Federal Minister with sole responsibility for gambling harm reduction
- A phased total ban on online gambling advertising
- A prohibition on all gambling inducements and incentives
- Significant and effective penalties for BetStop and other breaches for gambling companies
- National regulation provisions to prevent the proceeds of crime from being used to fund online gambling, and a legal taskforce established to develop these provisions.
- Duty of care provisions for operators.

GHLEE also supports binding limits on gambling losses; gambling duty of care provisions for Banks and financial institutions; and a complete ban on Members of Parliament, political parties and publicly appointed officials receiving hospitality, gifts and donations from gambling companies and aligned organisations such as the Australian Hotels Association.



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GHLEE's summary

Australia does not have a gambling participation problem. Australia has a gambling harm problem.

The proposed reforms represent progress, but they are not commensurate with the scale of harm occurring in Australian communities every day, including more than \$32 billion in losses every year.

The measure of success should not be whether reform is politically achievable. The measure of success should be whether reform meaningfully reduces gambling harm and protects Australians from preventable financial, psychological and social harm.

We do not believe these proposed reforms go anywhere near far enough to do anything more than tweak around the edges of gambling harm in Australia and we are deeply disturbed that the gambling industry is being treated as a valued stakeholder throughout this process while lived experiences experts, such as members of GHLEE, have been all but ignored. We have to repeatedly request to get meetings with Ministers and then generally only get offered a meeting with an adviser. Meanwhile gambling industry representatives such as Peter Vlandys literally stand beside the Prime Minister at media conferences. Imagine if the head of Philip Morris was recorded standing next to the PM spruiking tobacco.

We are perplexed as to why the very considered, evidence-based and non-partisan reforms recommended in the Murphy Report have been all but cast aside. This inquiry was a rare example of apolitical investigation that was measured and respectful, with outcomes that were unanimously supported by the Inquiry's members regardless of their party or independence. The GHLEE members who gave testimony and interacted with this inquiry all speak highly of their experience. They felt heard and valued as they shared their stories of devastating gambling harm.

This harm occurred because of a predatory industry and it remains baffling to us that the gambling industry is still considered a valued stakeholder in this debate. Was the tobacco industry afforded this level of access and consideration when Australia led the way on plain packaging laws? No.

The tobacco industry was rightfully recognised as having vested interests, just as the gambling and media companies do in this context. It is beyond painful to hear the gambling industry referred to by the Prime Minister as stakeholders by people who have suffered at their hands; it is disturbing to see him standing side-by-side with Peter Vlandys – one of the most influential people in Australian gambling – while he refuses to meet with us.

Despite this lack of respect and value shown to GHLEE members and other people advocating for gambling reform by the Prime Minister, we stand in strong agreement with him in his stated aim to bring back “the love of the game” without the need to gamble.

But as long as the gambling industry is permitted to continue advertising and targeting our children; is permitted to offer dangerous incentives to gamble; is essentially permitted to engage in BetStop breaches due to there being no substantive enforcement or penalties for them; is permitted to profit from the proceeds of crime; they are effectively being given free rein to exploit Australian people and communities with impunity.

That is not right. People, and most especially our children and young people, should come first. Governments have the obligation to make our communities as safe as possible, and by allowing the gambling industry to thrive on the back of human misery they are rubber stamping their greed ahead of the health and wellbeing of our people.



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GHLEE remains committed to working constructively with governments and regulators.

For any gambling reforms to be effective, we need to be consulted along all steps of the way.

We are deeply concerned by the lack of consultation to date and sincerely hope that this massive oversight will not continue into the future.

We don't invest thousands of volunteer hours every year into advocating for gambling reform lightly. We do it because we have personally experienced the deep and lasting harms from gambling: we have lost our homes; we have spent years in prison; we have contemplated or attempted taking our own lives; we have lost years of our lives to gambling harm. We cannot get any of these losses of time, freedom or money back. But we know we can stop this from happening to other Australians by being relentless in advocating for meaningful gambling reform.

It's time for gambling harm to be addressed as the serious and deadly public health issue that it is.

It's time for the voices of lived experience to be heard and valued.

It's time for the people of Australia to be put ahead of the gambling industry's profits.

It's time for our children to no longer grow up thinking gambling is a normal part of sport and socialising in this country.

It's past time for Australians to no longer be the biggest gambling losers in the world.

We are here to help. We want to help. We know what will help. Let us help!