

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Stan CIA - for review - gambling advertising [SEC=OFFICIAL]  
**Date:** Tuesday, 20 May 2025 9:13:31 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.jpg](#)  
[image006.jpg](#)

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No probs

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**From:** [REDACTED]  
**Sent:** Monday, 19 May 2025 5:18 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Stan CIA - for review - gambling advertising [SEC=OFFICIAL]

[REDACTED]

I haven't been able to use that link or get into CRM or CM at all today.

I'll try again tomorrow.

[REDACTED]

[REDACTED]

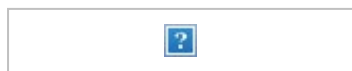
Manager  
Gambling Compliance Team

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**Australian Communications and Media Authority**

[REDACTED]

[acma.gov.au](https://acma.gov.au)



*The ACMA acknowledges First Nations peoples as the Traditional Owners and Custodians of Australia. We respect and celebrate First Nations peoples as the original storytellers and content creators of the lands on which we work and honour the enduring strength and commitment of Aboriginal and Torres Strait Islander peoples to the land, waters and their communities. We pay our respects to Elders past, present, and emerging.*



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**From:** [REDACTED]  
**Sent:** Monday, 19 May 2025 1:38 PM  
**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** FW: Stan CIA - for review - gambling advertising [SEC=OFFICIAL]

Hi [REDACTED]

I have rewritten the CIA for the Stan matter (gambling advertising) to be consistent with the Paramount+ CIA.

Can you please review this CIA:

1. [http://appsp/broadcasting/acmav001\\_assessmentbrief/CIA-2025-00069/CIAChecklist%2014-04-2025%2011-41.docx](http://appsp/broadcasting/acmav001_assessmentbrief/CIA-2025-00069/CIAChecklist%2014-04-2025%2011-41.docx).

Thanks

[REDACTED]

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**From:** [REDACTED]

**Sent:** Wednesday, 14 May 2025 8:12 AM

**To:** [REDACTED]

**Subject:** RE: Stan CIA - for review - gambling advertising [SEC=OFFICIAL]

Hi [REDACTED]

As discussed in our previous gambling ads meeting, we are looking to draft consistent CIAs for each of the Paramount+, Stan and [REDACTED] matters, all of which address similar issues. [REDACTED] signed the CIA for Paramount+ yesterday – please see attached. Could you please amend the Stan CIA to be consistent with that CIA and then I will review.

Happy to discuss – I am not working today.

Cheers [REDACTED]

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**From:** [REDACTED]

**Sent:** Tuesday, 29 April 2025 3:26 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** FW: Stan CIA - for review - gambling advertising [SEC=OFFICIAL]

Hi [REDACTED]

I have updated the Stan CIA with the new template and a proper analysis section, for your review:

1. [http://appsp/broadcasting/acmav001\\_assessmentbrief/CIA-2025-00069/CIAChecklist%2014-04-2025%2011-41.docx](http://appsp/broadcasting/acmav001_assessmentbrief/CIA-2025-00069/CIAChecklist%2014-04-2025%2011-41.docx).

Happy to discuss.

Thanks

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Monday, 14 April 2025 5:08 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Stan CIA - for review [SEC=OFFICIAL]

Hi [REDACTED]

Can you please review the following CIA for the Stan matter (gambling advertising):

1. [http://appsp/broadcasting/acmav001\\_assessmentbrief/CIA-2025-00069/CIAChecklist%2014-04-2025%2011-41.docx](http://appsp/broadcasting/acmav001_assessmentbrief/CIA-2025-00069/CIAChecklist%2014-04-2025%2011-41.docx).

As discussed, the recommendation is to not investigate.

If you are happy with the CIA, I can draft an email to Stan along the lines set out in the CIA.

Thanks

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 4 April 2025 4:39 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** FOR COMMENT - response to request for information - Gambling advertising on Stan [SEC=OFFICIAL]

[REDACTED]

We received Stan's very comprehensive response to our request for information about gambling advertisements for 8xbet inserted in the live Australian coverage of the Super Rugby Aupiki game played in New Zealand on Sunday 9 March (see attached). Stan advised their policy is to be ad free and they had taken a number of steps to get a clean feed:

*As part of our compliance regime, Stan routinely contractually requires "clean feeds" from live sports rightsholders. When this is not possible, we place "blackout screens" into the feed where an in-program "commercial relating to betting or gambling" or "promotion of betting odds" is present....Stan was alive to the issue of virtual gambling advertising at the time it negotiated these contracts. Under the agreements, Rugby Australia is required to*

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

However, in this case there was human error by a 3<sup>rd</sup> party provider who was trialling the virtual overlayed ads. This activity was unauthorised.

As anticipated, Stan are relying on the accidental/incidental provisions (it was an international feed, they didn't receive any benefit, they weren't able to technically remove it at the time as they weren't notified the virtual ads would be included or that they would be for 8xbet, they'd taken steps through their contractual negotiations to protect against situations like this, it was human error, the ads were shown for 56 only which was incidental to the full coverage).

*Next steps*

[REDACTED]  
[REDACTED]

Please let us know if you have any queries.

Thanks [REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 3 April 2025 5:38 PM  
**To:** [REDACTED] Gambling <[gambling@acma.gov.au](mailto:gambling@acma.gov.au)>  
**Cc:** [REDACTED]  
**Subject:** Re: Email from the ACMA - Gambling advertising on Stan [SEC=OFFICIAL]

You don't often get email from [REDACTED]. [Learn why this is important](#)

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Dear [REDACTED]

Please see the **attached** correspondence, outlining Stan's response to the email (below) from ACMA to Stan dated 18 March 2025.

If you have any questions or require any additional information, please let us know.

Yours sincerely

[REDACTED] [REDACTED]

Senior Legal Counsel, Stan.

[REDACTED]

[REDACTED] | [www.stan.com.au](http://www.stan.com.au)



On Tue, 18 Mar 2025 at 16:26, Gambling <[gambling@acma.gov.au](mailto:gambling@acma.gov.au)> wrote:

Dear [REDACTED]

**Gambling advertising during the live stream of women's rugby game between Matatu and Hurricanes Poua**

The Australian Communications and Media Authority (ACMA) has received information which suggests that gambling advertisements occurred during live Australian coverage of the Super Rugby Aupiki game between Matatu and Hurricanes Poua played in Christchurch, New Zealand on Sunday 9 March (**Super Rugby game**), provided by Stan. Specifically, that virtual advertisements for 8XBet were inserted into the stream.

***ACMA's role in administering gambling advertising rules***

As you are aware, the ACMA administers the *Broadcasting Services Act 1992* (BSA) and *Broadcasting Services (Online Content Service Provider Rules) 2018* (the **Online Rules**) which (among other things) place certain restrictions on gambling advertising streamed during live sports online.

On 30 August 2024 the ACMA published Investigation report [BI-688](#). Notably, in that report the ACMA articulated its expectations that if virtually overlaid gambling advertising is a feature of international live sports feeds, the ACMA expects service providers to explore options for receiving a feed that is free of virtually inserted gambling advertising, or for establishing a technical system for removal of inserted virtual gambling advertising from the livestreamed matches that are provided to subscribers in Australia. Further details about the ACMA's expectations in this regard are set out in Attachment A at the end of this email for your information, along with another matter which is relevant to the ACMA's consideration of the gambling advertising rules.

The ACMA also administers the [Interactive Gambling Act 2001 \(IGA\)](#) which (among other things) prohibits certain interactive gambling services being provided or advertised to Australians. The advertising prohibitions are set out in Part 7A of the IGA. Further information about the IGA is available on the ACMA website [here](#). The 8XBet service does not appear to be licensed in Australia. Please see the register of Australian licensed wagering services maintained by the ACMA on its website [here](#)

### ***Request for information***

The ACMA is considering whether to commence an investigation:

- under the BSA, into whether gambling advertisements were streamed during a live sporting event in breach of the relevant Code or Online Rules
- under the IGA, into whether interactive gambling services were being advertised to Australians in contravention of the IGA.

To assist with our further consideration, we would appreciate it if you could provide the following:

- The name of the entity which provides the Stan streaming service into Australia.
- Details about the timing of the live coverage of the Super Rugby Game, including start and end times of play and any scheduled or unscheduled breaks (Full Coverage).
- Details about how the Full Coverage could be watched using Stan services, including:
  - > details of all the broadcast channels and streaming services on which it was available
  - > details of whether coverage on any of the streaming services was a simulcast.
- A copy of the stream of the Full Coverage (no edits) on each broadcast channel and streaming service it was available.
- Confirmation whether there were any gambling advertisements shown during Full Coverage on any of the above broadcast channels and streaming services it was available, including:
  - > details of any 8XBet advertisements as set out above
  - > details of the placement of any gambling advertisements (such as virtual insertion on field / boundary, or physically present at ground)
  - > the times of any gambling advertisements shown
  - > details of the gambling services being advertised, including names and its website.

- If gambling advertisements were included in the Full Coverage, details of efforts made by Stan to seek alternative feeds free of any virtual ads and to explore options to remove these ads.
- Substantiation of the advertised scheduled start time of play each day in the Full Coverage.

You may, of course, make any other submissions, or provide any other documents, that you think relevant to the ACMA's consideration of this matter.

### **Next steps**

Please provide your response to this email by **COB 1 April 2025**

If you have any questions, please contact me by phone [REDACTED] or email at [REDACTED].

Regards [REDACTED]

[REDACTED]  
Manager  
Gambling Compliance Team

Australian Communications and Media Authority

[REDACTED]  
[acma.gov.au](http://acma.gov.au)



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