

17 December 2025

Manager, National Self-Exclusion Register Section
Australian Communications and Media Authority
PO Box 13112 Law Courts
Melbourne VIC 8010

Submission uploaded: 17 December 2025

Dear ACMA

Regarding cost recovery arrangements for BetStop – the National Self-Exclusion Register™ -

We appreciate the opportunity to provide feedback on ACMA's draft Cost Recovery Implementation Statement (CRIS) 2025–26 for BetStop – the National Self-Exclusion Register (BetStop). We also appreciate you taking the time to assess our submission from 7 March 2025.

Dabble fully supports BetStop's purpose to provide an effective tool for individuals who decide to self-exclude from all online wagering providers. Our comments below seek to ensure the cost recovery framework meets Betstop's objectives, without creating unintended burdens on compliant online wagering providers.

Feedback

As part of this consultation, we address three key concerns with the current cost recovery arrangements (and other matters relating to the administration of BetStop) below:

1. Year-on-year levy cost volatility complicates budgeting

We note that the industry's total BetStop levy has varied considerably, making financial planning difficult for operators. For instance, this draft CRIS projects the 2024-25 levy at \$14.28 million, representing a **11.9% increase** from 2023–24. Given the impact such increases can have on budget forecasting, we respectfully request that ACMA explore ways to smooth out costs that can lead to variations.

For example, capping year-on-year increases, or by providing more frequent updates to IWP's should significant variations be expected.

In the interests of transparency, and to assist IWP's plan for material changes to future levy amounts, we encourage ACMA to:

1. Provide earlier notice of likely variations to forecast costs (particularly where increases appear probable and/or predictable),
2. Provide IWP's an explanation of the key drivers of any variance,
3. Adopt a standard variance reporting approach (e.g., explaining movements above a threshold such as $\pm 10\%$), and
4. Offer indicative quarterly updates on expected full-year costs.

Collectively, these measures would greatly assist Dabble and other IWPs' in budgeting for this cost.

2. Use of levy funds for promotional campaigns - opportunities for greater transparency and co-design.

We note ACMA's comments regarding the following item contributing to cost increases associated with the administration of BetStop:



- *Promotion of the NSER – The ACMA ran a campaign during the year to promote the NSER through online search and social media channels. (Page 11.)*

We agree that promoting BetStop is important to ensure every punter is aware of and informed of self-exclusion options, however we would have preferred to know about this for both transparency and to be given the option to contribute to the planning and execution of it. One of our guiding principles is to engage openly and constructively with regulatory authorities, to offer insights and to contribute to and support initiatives such as this campaign. These campaigns appear to be funded by our levy contributions, and we therefore believe that we (and other IWPs) should've been consulted and given the option to support or collaborate on it.

For future promotional campaigns, we encourage ACMA to involve wagering providers in the design and planning of these initiatives. An industry co-design approach could help tailor messaging for maximum impact and ensure funds are used effectively to reach at-risk individuals, or to run internal campaigns to our existing customer base to increase coverage. At a minimum, regular reporting on levy-funded promotional activities and their outcomes would give stakeholders confidence that this aspect of the program is delivering value in-line with best practices.

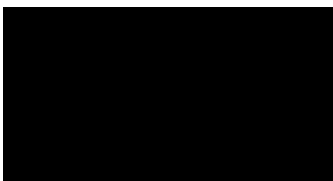
Conclusion

We thank ACMA for the opportunity to provide feedback as a part of this consultation on the draft 2025–26 CRIS for BetStop. We remain committed to working productively with ACMA to ensure our industry is regulated fairly, transparently, and in a way that promotes the well-being of all stakeholders. We remain fully supportive of BetStop's harm-minimisation mission, and we share ACMA's goal of making it as effective, trusted and sustainable as possible.

Thank you for your consideration of our submission. Please do not hesitate to contact us if any clarification is required.

Yours sincerely,

Sincerely,



Head of Compliance
Dabble Sports Pty Ltd.