



Australian Communications and Media Authority
(via email: betstop@acma.gov.au)

RWA Submission on the 2025-26 Cost Recovery Implementation Statement

Responsible Wagering Australia (**RWA**) is the peak body representing the Australian licensed online wagering industry. Our members include Australia's major online wagering service providers (**WSPs**): bet365, Betfair, Picklebet, PointsBet, Sportsbet, and Unibet. Our members are committed to fostering a responsible, transparent, and competitive wagering environment that supports both industry sustainability and strong consumer protections.

RWA welcomes the opportunity to comment on the draft 2025-26 Cost Recovery Implementation Statement (**CRIS**) for BetStop - the National Self-Exclusion Register (**BetStop**). RWA reiterates its strong support for BetStop and the consumer protections it provides. The high volume of checks- more than 12 billion in 2024-25 alone - demonstrates the scale at which the system operates and the seriousness with which operators engage with their responsibilities under Part 7B of the *Interactive Gambling Act 2001*.

BetStop is now a firmly established part of Australia's safer gambling framework, with WSPs and regulators working together to ensure the system functions as intended for those who choose to use it. As key participants in the Register's operation, RWA members have a strong interest in ensuring that the cost-recovery arrangements remain effective, transparent, predictable and aligned with the intent of the *National Self-Exclusion Register (Cost Recovery Levy) Act 2022 (Cost Recovery Levy Act)*.

With this in mind, our comments on the draft CRIS focus on three areas:

1. Opportunities for ACMA to improve transparency and the level of detail contained in invoices.
2. Ensuring that the activities recovered through the levy, such as research, align with the cost categories set out in the Cost Recovery Levy Act.
3. Considering opportunities for the ACMA to enhance forward visibility of projected costs, assisting WSPs to plan effectively for potential variations in expenditure over time.

Improving Transparency in Invoicing

RWA strongly supports the operation of BetStop and recognises the importance of a stable and sustainable funding model. As the scheme matures, it is vital that cost-recovery arrangements continue to evolve in a way that supports confidence, clarity and long-term trust in the model - both for operators and for the Commonwealth.

The draft CRIS confirms that the levy for 2024-25 has risen to \$14.28 million - an increase of nearly 12 per cent on the previous estimate - with the uplift attributed to a range of activities including security assessments, promotional work, staffing and research.

RWA recognises that costs may fluctuate over time as the scheme matures, particularly in its early years. However, maintaining confidence in the framework requires operators and other stakeholders to have a clear line of sight over the components that make up the total recoverable cost. This is especially important in years where cost variations are larger than expected, or where new activities (such as security enhancements or expanded promotional work) contribute materially to the uplift.

At present, the invoice issued to operators provides only two core data points:

- the calculated cost per check, and
- the number of checks completed during the period.

As shown in the example below, this format presents the usage component of the levy clearly, but does not set out the other cost components that make up the total recoverable amount under the CRIS, such as operational expenditure, maintenance costs, system enhancements, promotional activity, staffing, or other scheme-wide costs set out in the CRIS.



This invoice is issued by the Australian Communications and Media Authority (ACMA). The ACMA is authorised to recover the costs under the National Self-exclusion Register (Cost Recovery Levy) Act 2019. The National Self-exclusion Register (Cost Recovery Levy) Determination 2022 sets out the methodology used for calculating the amount of this invoice.

If you have any questions about this invoice, please call 1800 673 722 or by submitting an [online enquiry](#).

Invoice	
Australian Communication & Media Authority (ACMA) ABN: 55 386 169 386	
To: ABN: Contact:	[REDACTED]
Invoice Number:	[REDACTED]
Issue Date:	29/05/2025
Total Amount:	[REDACTED]
Due Date:	28/06/2025

Cost for usage during 2023-24

Calculated cost per check (cents):	0.0 [REDACTED]
Total checks in period:	[REDACTED]
Total amount payable:	\$ [REDACTED] (NO GST PAYABLE)

Given the breadth of activities funded through the levy, including an itemised breakdown of key cost categories on the invoice itself would materially improve transparency for operators and stakeholders. It would reduce the need to cross-reference multiple sources, provide clearer visibility of the factors shaping levy movements over time, and support internal governance, budgeting and audit processes.

In particular, separating out major components such as operational expenditure, staffing, security work, promotional activities, and other significant drivers would allow operators to understand how the total recoverable amount has been formed and how it may vary from year to year. Presenting this information directly on the invoice would align it with common invoicing practice, where key cost components are itemised for transparency.

Providing this information would help operators understand both the basis for their individual levy and the broader cost profile of the scheme. It would also strengthen stakeholder confidence in the long-term cost-recovery framework as BetStop moves into steady-state operation.

Clarifying the Scope of Recoverable Costs

The CRIS notes that part of the 2024-25 cost uplift relates to research undertaken by ACMA “to help understand how the service is working and how it can be improved.” RWA supports continuous improvement of BetStop and recognises the value of building an evidence base around its effectiveness. That said, the legislative framework sets clear boundaries around what the levy is designed to recover. The Cost Recovery Levy Act and its Explanatory Memorandum specify that the levy is intended to meet the costs of:

- establishing the National Self-Exclusion Register,
- operating the register, and
- undertaking compliance and enforcement activities that ensure it functions as intended.

Education and awareness activities sit comfortably within this framework, as they directly support consumer uptake and effective operation. However, the inclusion of research is less clearly defined within this operational scope - particularly where such work extends beyond immediate service delivery and/or compliance and into broader policy evaluation. Given the lack of explicit reference to research in the Cost Recovery Levy Act or its Explanatory Memorandum, it would be useful for the ACMA to outline the legislative basis for determining these research activities to be considered in scope. This would provide certainty for industry, and ensure that the cost base remains firmly aligned with the statutory intent of the Act.

Even if research were to be interpreted as falling within the current definition, it is still worth considering whether it is appropriate to include it in the cost base. Research activity often looks beyond the day-to-day operation of the register and contributes to broader insights about consumer behaviour and harm minimisation. Including these costs in the levy could gradually broaden the scope of cost recovery in ways not originally intended, and make it more difficult to maintain a clear distinction between the operational costs of running BetStop and the wider analytical or policy work that supports the broader gambling regulatory framework.

RWA therefore suggests that ACMA consider whether research is most appropriately funded through the levy, or whether it may more appropriately be supported through departmental appropriations or broader policy research programs. This would ensure that cost-recovered charges remain tightly aligned with the purpose set out in the Cost Recovery Levy Act, while still enabling ACMA and the Government to pursue valuable research into gambling harm and service performance.

Strengthening Forward Visibility and Cost Predictability

RWA welcomes ACMA’s inclusion of forward cost estimates. Visibility over anticipated expenditure is important for operators’ financial planning, helping to avoid unexpected volatility and supporting continued confidence in the long-term operation and sustainability of BetStop.

To help operators in budgeting and internal assurance processes, industry would welcome additional detail in the following areas:

- Improved visibility of cost drivers - including which elements of the scheme are most likely to fluctuate (such as security assessments, system enhancements, education activity or contractor costs) and what factors typically influence these movements.
- Guidance on promotional and awareness activity - particularly whether future campaigns will be undertaken annually, periodically, or only as required.
- More regular forward updates during the levy period, even if indicative, where ACMA anticipates a material variance (upwards or downwards) in the projected annual costs.

Providing this form of forward-looking advice would allow operators to plan more effectively, budget with greater certainty, and provide their own internal assurance that cost movements are tied to the core operation of the scheme. It would also reinforce the stability and predictability of BetStop's cost-recovery arrangements at a time when the system is settling into steady-state operation following the completion of establishment activities at the end of 2025-26.

Conclusion

RWA appreciates the opportunity to comment on the draft CRIS and continues to support the effective, sustainable operation of BetStop as a core national consumer-protection measure. Our feedback is offered in a constructive spirit, with the shared aim of ensuring the scheme remains transparent, efficient and trusted by all stakeholders.

We look forward to ongoing engagement with the ACMA as the scheme evolves and would welcome further opportunities to contribute to the continuous improvement of BetStop. Should you require any further information about these issues, please contact

[REDACTED], Head of Policy and Operations, at
[REDACTED]

Yours sincerely,

[REDACTED]
Chief Executive Officer

16 December 2025