

# SUBMISSION

Friday 12 June 2026

## **Exposure Draft: Interactive Gambling Amendment (Gambling Reform) Bill 2026**

### **A Bill for an Act to amend legislation relating to interactive gambling, and for related purposes**

#### **Online submission**

The Australian Medical Association (AMA) has advocated for stronger regulation of gambling since 2013. Gambling poses serious risks to Australian's physical and mental health. We will continue to campaign for the recognition of gambling as a critical public health issue. The AMA has long warned that gambling advertising is deeply embedded in sport and online environments, helping to normalise gambling for young people. Research shows that children are increasingly aware of gambling brands and betting odds, and many report seeing gambling advertisements at times and in places where they should not.

The AMA appreciates the opportunity to comment on the exposure draft of the *Interactive Gambling Amendment (Gambling Reform) Bill 2026*. The AMA maintains this Bill should be stronger and have more powers to control and compel online gambling companies to more. The Bill contains four schedules, and our comments are structured accordingly.

#### ***Schedule 1: Restrictions on wagering advertising***

##### *62H: Meaning of a restricted user*

The AMA is deeply concerned of the Bill's dependence on the success of the legislation implemented in 2025: Online Safety Amendment (Social Media Minimum Age) Act 2024. The first e-Safety report on the social media minimum age shows that children circumvent the ban, with relative ease, in the first three months of implementation. Platform-based enforcement is not a substitute for upstream advertising restrictions. The AMA sees Division 3- Prohibitions on providing wagering advertising content on online content services problematic based on the ineffectiveness of the social media minimum age Act 2024, specifically 62P, 62Q. Delegating child protection to platforms whose commercial interests are misaligned with public health outcomes is not a credible safeguard.

*62L: Prohibition on wagering advertising content during live coverage of sporting events- overnight*

The 62L Prohibition on wagering advertising content during live coverage of sporting events-overnight hours (8.30pm-6.00am) will not be in place in the instances of scheduled or unscheduled breaks. Exemptions for scheduled or unscheduled breaks are commercially meaningful and practically unenforceable.

The AMA does not accept that live coverage of sport during overnight hours should be given wagering advertising exemptions. Anything less will continue to expose Australians — especially children (8.30pm to 10.30pm) to relentless gambling promotion.

*62W: Restriction relating to wagering advertising content- harmful or misleading material*

Gambling is a health-harming addictive behaviour, recognised in the International Classification of Diseases 11th Revision (ICD-11) and Diagnostic and Statistical Manual of Mental Disorders 5th Edition (DSM-5)<sup>1</sup>. Advertising is an influential force in shaping consumer behaviour and the gambling and sports betting agencies are experts in navigating the very fine line between marketing and harm. Sports betting companies allocate enormous budgets<sup>2</sup> to marketing and advertising designed to make gambling seem like a fun, acceptable social activity that goes hand in hand with being a sports fan. Betting ads create the impression that betting is an ordinary part of enjoying sports. Advertisements are designed to encourage riskier betting; increase betting expenditure; elicit attention, excitement, and desire to bet amongst vulnerable gamblers; and have negative effects on all gambler risk groups. The AMA's position is unambiguous: gambling advertising should be treated with the same seriousness as tobacco and alcohol advertising and regulated accordingly.

The marketing departments utilise consumer behaviour patterns to deliver tailored advertisements. This personalisation targets individuals who may already be at risk for problem gambling, especially young men. Data from the Australian Institute of Family Studies (2023) reported more men than women gambled on every product (e.g. sports, racing, pokies, lotteries, casino games)<sup>3</sup>. Men also gambled more often, spent more money and were more likely to be at risk of harm. A greater proportion of men who gambled were at-risk of harm (men = 53%; women = 38%), and the proportion at risk decreased with age for both men and women. Young adults aged 18-34 were more than twice as likely to be at risk of harm compared to those aged 55 and older.

The AMA maintains the only way to comply with 62W is to implement a full ban on gambling advertising, promotion and sponsorship of sports and other cultural activities. A standard requiring advertising to avoid being "harmful or misleading" is unworkable in practice and insufficient in ambition when the product itself is inherently harmful.

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<sup>1</sup> <https://www.who.int/news-room/fact-sheets/detail/gambling>

<sup>2</sup> <https://www.afr.com/companies/games-and-wagering/sportsbet-splashed-more-than-64m-on-gambling-ads-in-18-months-20230704-p5dlqk>

<sup>3</sup> <https://aifs.gov.au/all-research/research-snapshots/gambling-participation-and-experience-harm-australia>

### ***Schedule 2- Disruption of illegal gambling services***

The AMA is supportive of any mechanisms to disrupt illegal gambling services. We recommend ACMA make written guidelines about what is, or what is not, reasonably practicable for the purposes of subsection 15J(2) as soon as possible. We also recommend enforcement powers and fines are significantly strengthened to deter illegal gambling services.

### ***Schedule 3- Betstop***

The AMA notes the government's efforts to assist problem gamblers to seek help and self-impose a ban from using Australian registered wagering services. We are pleased to see the framework governing the National Self-Exclusion Register is strengthened and the opportunity to implement the recommendations arising from the Statutory Review of Betstop within this Bill is timely.

### ***Schedule 4- Online lottery products***

The AMA is pleased to see online keno and foreign matched lotteries prohibited. However, enforcement and ensuring online presence is limited will be paramount.

## **Conclusion**

The AMA supports the intent of this Bill and welcomes measures that strengthen protections against gambling harm. However, the overwhelming evidence, and the AMA's own longstanding position on gambling advertising, is that partial restrictions and reliance on existing platform safeguards will not provide the comprehensive protection Australians need, particularly children and young people. Gambling harm must be treated as a serious public health issue, with regulation that is nationally consistent, enforceable and leaves no room for circumvention. The AMA therefore urges the government to strengthen this Bill in line with the evidence and the recommendations of the *You win some, you lose more* inquiry, including a clear pathway to a comprehensive ban on online gambling advertising and stronger national oversight to reduce harm.

## **Contact**

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