# COAG Consultation RIS

# National Consumer Protection Framework

# Response Template

This response template has been developed to assist with providing comments on the Consultation RIS for the National Consumer Protection Framework for online wagering. Should you wish to provide comments in a different format, this can be submitted through the DSS Engage website (engage.dss.gov.au) by navigating to the ‘make a submission’ page and providing a comment, submission or attachments there. The consultation period will be open until 16 June 2017.

| General comments about the RIS |
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| [A National self-exclusion register](#_1._A_national) |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified? Please give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider, please outline the proportion of your clients who are currently self‑excluded, including multi‑operator self-exclusion.** |
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| 1. **Do you consider an ICT solution to be viable? What timeframe is this achievable in? Are there any impediments to implementation, such as software communication?** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| **Other comments on a national self-exclusion register** |
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| [A voluntary, opt-out pre-commitment scheme](#_2._A_voluntary,) |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified, including timeframe for implementation? Please give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider and offer pre-commitment tools for online wagering, please outline the proportion of clients who are currently using pre-commitment features.** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider, do you have any concerns with the end of 2017 implementation timeframe? If so, what do you believe is a suitable timeframe?** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| **Other comments on a voluntary, opt-out pre-commitment scheme** |
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| [Prohibition of lines of credit](#_3._Prohibition_of) |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified? Please give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider or on-course bookmaker, and offer lines of credit, how many customers on average apply for a line of credit? How many customers do you offer lines of credit to? What is the average turnover of these customers?** |
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| 1. **For option three, do you support an exemption for VIP and professional punters and/or for on‑course bookmakers? Please justify why or why not. Please include any calculations, analysis or evidence that supports your position, including a policy rationale as to why the exemption/s should be included as part of this measure.** |
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| 1. **What do you consider to be an appropriate way to define who is, and who is not exempt for the purposes of a ‘carve‑out’ for on-course bookmakers?** |
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| 1. **What do you consider is an appropriate monetary threshold to fall into the VIP and professional punters category? Do you consider there are other, non-financial, parameters for establishing a VIP or professional punter?** |
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| 1. **What do you consider are appropriate financial and harm minimisation checks to be completed before lines of credit are offered to VIP and professional punters?** |
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| 1. **Is the proposed on-course bookmaker exemption likely to pose any unintended consequences?** |
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| 1. **If you are an on-course bookmaker, what would the financial impact be on your business if you were unable to use telephone-based operations to facilitate lines of credit for customers? What would the financial impacts be if you were unable to use telephone operations to facilitate lines of credit for customers? Please include any calculations, analysis or evidence that supports your position.** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| 1. **What do you think is a suitable transitional period for operators to transition to this measure under each option? Would a different period(s) be better and why?** |
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| **Other comments on a prohibition of lines of credit** |
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| [Offering of inducements consistent with responsible gambling](#_4._Offering_of) |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified? Please give substantiating evidence where possible.** |
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| 1. **For options two and three, if you are an online wagering operator, what is your expected loss/gain in revenue drawn from the offering of inducements?** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **Do you agree with the current NSW definition of an inducement, identified in option two? Would you suggest a change? Please justify why.** |
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| 1. **Do you consider customer loyalty programs to be an inducement? Should this be incorporated into a band, as per option three?** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| **Other comments on the offering of inducements consistent with responsible gambling** |
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| [Activity statements on demand and on a regular basis](#_5._Activity_statements) |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified? Please give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider, please outline how many customers you provide activity statements to. How do you provide these activity statements to clients? What is the cost of providing activity statements and of making these available at all times?** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider, do you have any concerns with the end of 2017 implementation timeframe? If yes, what do you believe is a suitable timeframe?** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| **Other comments on activity statements** |
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| [Responsible gambling messaging](#_6._Responsible_gambling) |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified? Please give substantiating evidence where possible.** |
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| 1. **What do you consider the costs will be to undertake research on RGM for online wagering, including how long this research will take and who should financially contribute to this research? What do you consider the costs are for dynamic messaging?** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| **Other comments on responsible gambling messaging** |
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| [Staff training](#_7._Staff_training) |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified? Please give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider, what proportion of your staff, and how often do you provide these staff, with training for wagering activity?** |
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| 1. **If you are an online wagering provider, what do you consider the cost is of training one staff member? That is, considering the cost of the training provider (if any), amount of hours it takes and hourly rate of staff, etc.** |
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| 1. **What do you consider will be the costs for developing learning objectives that ensure stronger consumer protections? How much do you consider it will cost, and how long will it take to develop an approved training program for staff?** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider, do you have any concerns with the end of 2017 implementation timeframe? If yes, what do you believe is a suitable timeframe?** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| **Other comments on staff training** |
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| [Reducing the current customer verification period](#_8._Reducing_the) |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified? Please give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider, please outline the number of online wagering accounts you have, including the average of how many new accounts you need to verify per year?** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **If you are an online wagering provider, what do you consider the impact would be if customers were restricted from using their online wagering account prior to their identity being verified? What would be the associated costs and benefits or disadvantages of this feature?** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| **Other comments on reducing the customer verification period** |
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| [Links to](#_9._Payday_lenders) SACC providers / pay day lenders |
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| 1. **What is your preferred option? Please justify why.** |
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| 1. **What are the costs and benefits or disadvantages associated with the current arrangements and your preferred option?** |
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| 1. **In your view, are there any other costs and benefits or disadvantages of each option that have not been identified? Please give substantiating evidence where possible.** |
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| 1. **For option three, if you are an online wagering operator, what do you estimate the loss of revenue would be from restricting payday loans to be used for online wagering activity?** |
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| 1. **For wagering operators (and for organisations affiliated with wagering providers), what are the potential impacts of ensuring affiliated organisations do not have any links with SACC providers?** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible.** |
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| 1. **Do you believe there are other, better options to implement this measure? Please justify why. What are the costs and benefits or disadvantages associated with this other option?** |
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| **Other comments about SACC providers/payday lenders** |
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| Implementation of the National Framework |
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| 1. **What is your preferred option? Please justify why. For example do you think the benefits of state or territory-based regulation and its inherent capacity to respond more directly to any local issues should remain in place? What are the benefits of this arrangement from your point of view? Does this have any drawbacks for states and territories administering a nationally consistent regime?** |
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| 1. **Which option do you think would best suit the conditions of the current Australian online wagering market? Please justify why and give substantiating evidence where possible.** |
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| 1. **What are the costs and/or benefits associated with the current arrangements, including in terms of promoting compliance with nationally consistent regulations, and your preferred option? Please identify and quantify all costs including labour costs, and the basis for these costs.** |
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| 1. **Does it make any difference to you if you are subject to multiple sources of regulation at the same time? While regulation remains consistent, are there any cost impacts incurred from keeping abreast of what rules apply to you? This is to enable governments to determine the baseline costs now and compare this against the costs for the proposed change.** |
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| 1. **Are there any features in the options presented that you have concerns with? Or, are there any particular features that you believe should be included? Please justify why and give substantiating evidence where possible. For example, is the potential complexity of regulation a concern if they remain consistent? Does it impact you in anyway while they remain the same between states and territories? Do you need to answer and or report to more than one regulator on matters concerning compliance with either the same measures, and or different measures?** |
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| 1. **Do you have any concerns about the potential for inconsistency arising in the future if a state or territory-based approach to regulation is maintained? Please justify why.** |
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| **Other comments on implementation of the National Framework** |
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| Final comments |
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