

OFFICIAL

Regulatory Impact Statement (RIS)

Gambling Regulations 2026

Department of Justice and Community Safety



Justice
and Community
Safety





A note on language

The Department of Justice and Community Safety (department) recognises language is powerful, and words can have various meanings for different people and a lasting impact on a person's life. Words in legal instruments are also important, along with their precision and consistency, as they are intended to aid and be used in the interpretation of legislation and regulations.

Some words used historically to discuss gambling have been stigmatising to people experiencing harm from gambling. The *Gambling Regulation Act 2003* (Vic) (Act), and regulations under that Act, sometimes use terms not in plain English or that may appear stigmatising.

Where possible, the department has attempted to use language in this document that does not contribute to this stigma. However, when using terms defined in the Act and the proposed Gambling Regulations 2026 (proposed Regulations), the language of those documents is used for clarity. For example, the term 'player' is used throughout the Act, and proposed Regulations but, where possible, this document refers to a person who gambles or a person who uses a gaming machine.

The Problem Gambling Severity Index (PGSI) is a questionnaire used by researchers and clinicians to estimate a person's risk of gambling-related problems and the negative consequences from those problems. When the term problem gambling is used in this document, it is referring to behaviours that can lead to negative consequences as assessed under the PGSI.

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Executive summary

The *Gambling Regulation Act 2003 (Vic)* (the Act) governs how gambling is conducted in Victoria. It is complemented by other instruments that provide detail to support the Act's intentions. This includes the Gambling Regulations 2015 (Gambling Regulations), which prescribe matters relating to the operation of different forms of gambling, including electronic gaming machines (EGMs), wagering and betting, trade promotion lotteries, raffles and bingo. It also includes the Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations 2025, which prescribe matters relating to pre-commitment and the conduct of loyalty schemes at gaming venues.

The Gambling Regulations are due to expire on 14 June 2026. Without these regulations, certain matters relating to the regulation of gambling and fees relating to different gambling types will no longer be prescribed. These prescribed matters are integral to supporting the Act's objectives and for the regulation of gambling to operate as intended.

The Gambling Regulations (Pre-commitment and Loyalty Scheme) Regulations were remade in 2025 and are now due to expire on 14 October 2035.

Without appropriate regulation, integrity and fairness in a range of gambling products would not be guaranteed and some gambling products would pose a higher risk of harm to people.

The department has reviewed the existing regulations and in consultation with stakeholders, developed the proposed Gambling Regulations 2026 to be made under the Act. The proposed Regulations will replace the existing Gambling Regulations. The key objectives of the proposed Regulations are to support the Act's objectives and maintain a robust regulatory framework for gaming in Victoria by:

- prescribing matters relating to different types of gambling, including EGMs, wagering and betting, trade promotion lotteries, and community and charitable gaming;
- prescribing fees relating to gambling;
- prescribing certain offences to be infringement offences; and
- providing for other matters that are authorised by or required to be prescribed by the Act.

In developing the proposed Regulations, the department considered 2 options for the regulation of each gambling type. These options are outlined and analysed in Chapters 7 and 8 of this Regulatory Impact Statement (RIS). Broadly, these options are:

EGMs and other gambling types

- **Base case:** the regulations sunset and are not remade.
- **Option 1:** the regulations are remade (with minor amendments where necessary).

The RIS also considered different options in relation to the fees charged for certain gambling-related applications, as outlined in Chapter 9:

Fees

- **Base case:** the regulations sunset and are not remade.
- **Option 1:** fees are set in line with current levels.
- **Option 2:** fees are aligned with new regulatory costs.

The costs and benefits of the options for each gambling type, as well as fees, are outlined and assessed in this RIS, which has been prepared to fulfil the requirements of the *Subordinate Legislation Act 1994* (Subordinate Legislation Act) and facilitate public comment on the proposed Regulations.



The RIS uses a multi-criteria analysis approach to select the preferred option for the proposed Regulations. The options for EGMs and other types of gambling are analysed against 4 criteria, with the following weights:

1. effectiveness to reduce gambling harm (15%);
2. protects the integrity of the product (30%);
3. impact of participant experience (5%); and
4. cost to government and to industry (50%).

The options for fees are analysed against 3 criteria, with the following weights:

1. reflective of cost and risk (45%);
2. horizontal equity (35%); and
3. simplicity (20%).

Each proposal was assigned a score using the above criteria (as relevant), with a scale of -10 to +10 compared to the base case, which is scored zero. Benefits are assigned positive scores while costs are assigned negative scores, relative to the base case.

Overall, **Option 1** (remake the regulations with minor amendments) was assessed as the preferred option across all gambling types, achieving a greater score than the base case. In relation to fees, **Option 2** (align fees with new regulatory costs) was assessed as the preferred option. The median fee increase under the preferred option is 33 per cent. Table 1 summarises the preferred option identified for each gambling type, and fees.

The preferred options, as incorporated in the proposed Regulations, unlike the base case, support the objectives of the Act by continuing the requirements currently placed on licensees – requirements that aim to minimise gambling-related harm and ensure the integrity of the gambling product. Given licensees and other industry participants are already required to adhere to the existing regulations, it is anticipated that the proposed Regulations are unlikely to have significant adverse impacts, including costs, on industry and government.

Table 1: Options analysed

Provisions	Non-preferred option(s)	Preferred option
Gaming machines – Physical environment	Base case: Regulations sunset	Option 1: Remake regulations with minor technical amendments
Gaming machines – Provision of information		
Gaming machines – Advertising and signage		
Wagering and betting		
Trade promotion lotteries		
Bingo		
Lucky envelopes		
Raffles		
Commercial raffles organisers		
Fees	Base case: Regulations sunset Option 1: Fees are set in line with current levels	Option 2: Fees are aligned with new regulatory costs



The department is responsible for implementing the proposed Regulations, which must commence prior to the expiration of the Gambling Regulations on 14 June 2026. The existing Gambling Regulations will be revoked by the proposed Regulations.

Transitional arrangements are not needed as the policy settings will remain the same under the proposed Regulations, however the department will communicate the outcome of this RIS process. The Victorian Gambling and Casino Control Commission (Commission) will be responsible for communicating to stakeholders about changes to its fees.

An evaluation of the proposed Regulations will be completed before they sunset in 2036 to inform future regulation. Evidence for the evaluation will rely primarily on data and information obtained by the Commission, in addition to consultation with stakeholders.



1. Introduction

1.1 Objective of proposed Regulations

The proposed Regulations support the Act's operation and seek to meet several key objectives:

- *Fairness*: ensuring people who gamble can do so with confidence it is being conducted fairly
- *Minimising harm*: minimising the risks gambling poses to individuals and the community, in a manner proportionate to the varying levels of risk presented by different gambling products
- *Safeguarding integrity*: supporting the integrity of gambling products and individuals in the gambling industry, including reducing opportunities for money laundering
- *Cost recovery*: ensuring regulatory costs are met efficiently and equitably.

1.2 RIS process

This RIS formally assesses the proposed Regulations against the requirements in the Subordinate Legislation Act, the Guidelines made under it and the Victorian Guide to Regulation.

The Subordinate Legislation Act requires the preparation of a RIS for any regulations that impose a significant economic or social burden on a sector of the public, to be made available with the proposed Regulations. This supports good decision-making and assist with review.

The assessment framework for this RIS:

- examines the nature and extent of the problem/s to be addressed
- outlines the objectives of the proposed Regulations
- explains the effects of the proposed Regulations on stakeholders
- assesses the costs and benefits of the proposed Regulations.

A key function of the RIS process is to allow comment on the proposed Regulations before they are finalised. Public input provides valuable information and improves the quality of regulations.

The Commissioner for Better Regulation provides an independent assessment of RISs against the Victorian Guide to Regulation. As the office of the Commissioner for Better Regulation is currently vacant, the Secretary of the Department of Treasury and Finance or their delegate is responsible for providing that independent advice.

1.3 RIS structure

The RIS is comprised of the following chapters:

- Chapters 2 and 3 provides background on gambling and gambling regulation in Victoria, while Chapter 4 explains the problem the proposed Regulations address
- Chapter 5 details the options considered in the development of the proposed Regulations and Chapters 7 and 8 assess these options against defined criteria, with Chapter 8.7 assessing options for regulator fees specifically
- Chapter 10 provides a summary of the preferred options
- Chapter 11 addresses the impact of the proposed Regulations on small business and competition, while Chapter 12 describes the implementation approach and evaluation strategy.



1.4 Public consultation and submissions

1.4.1 Consultation

In developing the proposed Regulations, the department has consulted state and local government representatives, gambling harm advocates, counsellors, researchers, individuals with a personal experience of gambling harm, key industry and peak body representatives, and technical specialists. It has also consulted the Commission and other parts of government.

1.4.2 Making a submission

Public comments and submissions are invited on the proposed Regulations and this RIS during the required 28-day consultation period, from 2 March to 29 March 2026. All submissions will be treated as public documents, unless confidentiality is sought by the author of a submission.

Written comments and submissions should be received no later than 5pm on 29 March 2026, with the Engage Victoria website the preferred method of receiving submissions.

Copies of the RIS and proposed Regulations can be obtained at <https://engage.vic.gov.au/gambling-regulations-2026>.

All submissions and comments will be considered by the department and the Minister for Casino, Gaming and Liquor Regulation (Minister) before the proposed Regulations are finalised. In addition, the department will prepare a response to the comments received.

Final Regulations will be published at <https://www.legislation.vic.gov.au/>.

2. Context

All Australian states and territories regulate their respective gambling industries. In Victoria, gambling and related activities are generally prohibited unless authorised under an Act of Parliament and regulations made under such Acts.

The range of gambling products available and used in Victoria includes gaming machines, wagering, sports betting, trade promotion lotteries, raffles, lotteries, casino table games, lucky envelopes and Keno. These products are defined and explained in Appendix A.

In Victoria, there are around 438 venues with gaming machines in operation, 7 bingo centres, 28 commercial raffle operators and 14 sports controlling bodies. There are also 27,227 gaming industry, casino and bookmaker employees.¹

Laws and regulations are the chief means to ensure gambling is conducted responsibly and appropriately to the circumstances.

2.1 Gambling participation

Gambling is a popular form of entertainment for an estimated 53.3 per cent of Victorians.² This includes those individuals who bet on sports, buy lotto tickets, or gamble at a racetrack, a

¹ Victorian Gambling and Casino Control Commission, *Annual Report 2024-25* (Report, November 2025) https://www.vgccc.vic.gov.au/sites/default/files/2025-11/VGCCC_Annual-Report-2004-25_Final.pdf, 10.

² A Suomi et al, *Victorian population gambling and health study 2023* (Report, Department of Justice and Community Safety, 2023), 20, <https://www.justice.vic.gov.au/justice-system/safer-communities/gambling/victorian-population-gambling-and-health-study-2023>.



totalisator venue, a commercial bingo centre or a hotel or a club. Many Victorian residents and visitors to the state enjoy gambling, although it has declined in popularity over the past decade.³

Figure 1: Victorian gambling participation rates

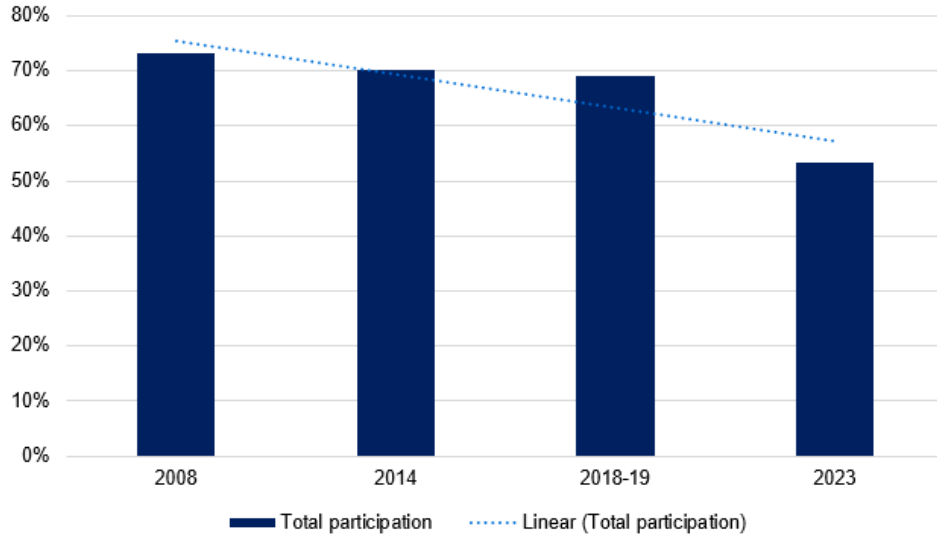


Table 2 summarises participation rates in different gambling activities for both the Victorian and gambling populations⁴ in 2023.⁵ The most common gambling activity, lotteries, was undertaken by 37.6 per cent of the overall Victorian population and 70 per cent of those who participated in any form of gambling. This was followed by buying raffle tickets, betting on horse, harness or greyhound racing, and betting on gaming machines.

Table 2: Percentage of the Victorian population and Victorian gambling population participating in specific activities

Gambling activity	Victorian population (%)	Gambling population (%)
Lotteries	37.6	70.0
Raffles	20.0	37.5
Horse, harness or greyhound racing	12.9	24.1
Electronic gaming machines (EGMs)	10.7	20.0
Scratch	9.1	17.1
Sports	5.1	9.5
Casino table games	4.7	8.9
Keno	2.1	3.9
Informal games	3.3	6.1
Bingo	1.5	2.8
Other	0.9	1.8
eSports	0.6	1.2
Fantasy sports	0.6	1.1

³ Ibid 28.

⁴ The survey was administered to Victorian residents aged 18 years or older, including people who do and do not gamble.

⁵ A Suomi et al, above n 1, 28.

Source: Adapted from *Victorian population gambling and health study 2023*, 23⁶

Popular activities, such as EGMs, betting on sports or horse racing (including horse, harness and greyhound racing) and casino table games, attract high participation rates.

The risks associated with gambling are outlined at Section 4.3, with greater detail about the harm associated with gambling at Section 4.2.

2.2 Gambling costs

The total cost of gambling was estimated at \$14.1 billion in 2022-23. This includes costs to people who gamble, affected others, the wider community and governments, and direct financial impacts and less tangible harms, such as emotional and psychological suffering and productivity loss. The total includes costs associated with all forms of gambling, including illegal offshore wagering. In the same period, 2022-23, gambling losses (the amount lost by people who gamble) were approximately \$7.4 billion.⁷ This represents an increase on the previous estimate of \$7 billion for 2014-15.⁸

Gambling may result in theft, fraud and other criminal activities, driven by the need to fund a gambling addiction.⁹ It is estimated that the percentage of people who gamble and report criminal behaviour due to gambling are 1.0 per cent, 3.8 per cent and 17.5 per cent for low-risk, moderate-risk and problem gamblers, respectively.¹⁰

In 2022-23 the total cost of crime to the Victorian justice system due to gambling was \$289.4 million.¹¹ The total estimated costs of crime to businesses due to gambling in Victoria in 2022-23 was \$26.2 million, including \$17.4 million from petty theft or dishonesty and \$8.8 million from major fraud.¹²

2.3 Community benefits

Gambling and the gambling industry contribute to the state's economy.

Gambling contributes to job creation and stable employment opportunities in metropolitan and regional Victoria. There were 27,227 people licensed to provide gambling activities in EGM venues and in casino and bookmaker industries in 2024-25.¹³ Many of these employees work on hotel and club gaming floors, supporting the delivery of responsible gambling, at a racecourse, or in an approved off-course premises.

⁶ Base: All Victorians (N = 11,000) and Victorian gambling population (n = 5,835). N represents the whole sample and n represents a group from within a sample.

⁷ M Browne et al, *Social costs of gambling to Victoria - 2023*, (Report, Department of Justice and Community Safety, 2025), 13 <https://files.justice.vic.gov.au/2025-06/The-social-costs-of-gambling-to-Victoria-2023.pdf>

⁸ M Browne et al, *The social cost of gambling to Victoria* (Report, Victorian Responsible Gambling Foundation, 2017) 44, <https://responsiblegambling.vic.gov.au/documents/121/research-social-cost-of-gambling.pdf>.

⁹ M Browne et al, 'Assessing gambling-related harm in Victoria: a public health perspective', (Report, Victorian Responsible Gambling Foundation, 2016), 63, <https://www.justice.vic.gov.au/safer-communities/gambling/assessing-gambling-related-harm-in-victoria-a-public-health-perspective>; E Langham, 'Understanding gambling related harm: A proposed definition, conceptual framework, and taxonomy of harms', (2015) *BMC Public Health*, 16(80), 10, <https://doi.org/10.1186/s12889-016-2747-0>.

¹⁰ M Browne et al, above n 14, 65.

¹¹ M Browne et al, above n 14, 66.

¹² M Browne et al, above n 14, 77.

¹³ Victorian Gambling and Casino Control Commission, above n 1.



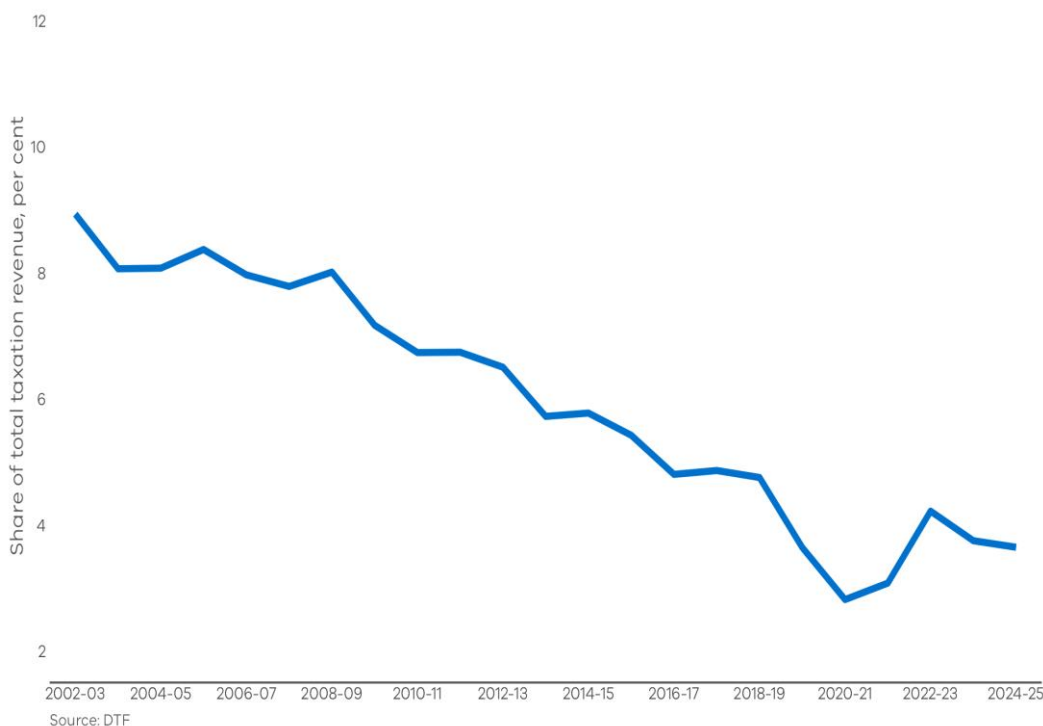
The Victorian racing industry, largely sustained by wagering, periodically commissions a study into the size and scope of the 3 racing codes. Its 2022 study found the industry is responsible for sustaining almost 35,000 full-time equivalent jobs.¹⁴

The industry is also a significant driver of tourism in the state, hosting regional, state, national and international events. This includes the Melbourne Cup Carnival which has had a total gross economic benefit to the Victorian economy of around \$4.7 billion over the past decade.¹⁵

Certain gambling products (bingo, lucky envelopes and raffles) are used by community and charitable organisations to raise funds and expand awareness of important issues. Income from charitable gambling has long been a reliable source of revenue with few restrictions. It can be used to pay for community events, infrastructure, sporting uniforms, and items for which it may otherwise be hard to secure funding.

Gambling taxes also provide a source of tax revenue. In Victoria, gambling activities and licences raised almost \$2.6 billion in taxes in the 2024-25 financial year.¹⁶ Around \$1.4 billion of that revenue came from gaming machine taxes. However, as a share of total own-source taxation revenue, gaming machine tax revenue have gradually been declining from around 9 per cent in 2002-03 to 3.6 per cent in 2024-25 (see Figure 2).¹⁷

Figure 2: Electronic gaming machine revenue as a share of total own-source taxation revenue, Victoria



¹⁴ IER, 'Size and Scope Study of the Victorian Racing Industry 2022', (Report, Victorian Racing Industry, April 2022), 30 and 31, <https://dxp-cdn.racing.com/api/public/content/vri-size-and-scope-study---april-2022-final-627460.pdf?v=c74ac76a>.

¹⁵ *Ibid* 23.

¹⁶ Department of Treasury and Finance (Vic), *Victorian Budget 2024/25 - 2024/25 Financial Report*, (Report, 2015) 9, <https://www.dtf.vic.gov.au/sites/default/files/2025-10/2024-25-Financial-Report.pdf>.

¹⁷ Department of Treasury and Finance (Vic), *Electronic Gaming Machine Tax Review*, (Report, February 2024), 3, <https://www.parliament.vic.gov.au/49646a/globalassets/tables-paper-documents/tables-paper-8040/electronic-gaming-machine-tax-review---12-february-2024-002.pdf>.



Source: Department of Treasury and Finance

Gambling tax revenue funds vital healthcare services, including hospitals, community organisations, mental health services and community education. Gaming machines are taxed at a rate of 8.33 per cent in Victorian hotels, which is distributed to the Community Support Fund (CSF).¹⁸ All remaining taxation revenue raised from EGMs in Victoria is distributed to the Hospitals and Charities Fund and the Mental Health Fund.¹⁹

Clubs operating EGMs can receive a tax concession of 8.33 per cent if they show they provide community benefits equal to or greater than 8.33 per cent of the club's net gaming revenue.²⁰

3. Gambling regulation in Victoria

Gambling is regulated to protect the community and preserve the integrity of gambling operations in Victoria.

- *Ensuring fair play*: Regulations promote fairness by requiring gambling providers to implement consumer protection measures to ensure gambling is conducted in a transparent and equitable manner, free of manipulation.
- *Promoting responsible gambling practices*: Regulations seek to reduce risks associated with gambling.
- *Protecting consumers*: Regulations help to safeguard the young and the vulnerable, protect the personal and financial information of people who gamble, promote responsible service of gambling practices to ensure users of gambling products are not gambling outside of their financial and economic means, and ensure gambling products are run and presented fairly.
- *Preventing criminal activity*: Regulations seek to mitigate the risk of criminal activity. The anonymous nature of many gambling products makes them vulnerable to criminal influence; cash is often used, and an individual's identity remains anonymous.
- *Supporting the economy*: The Victorian gambling industry employs Victorians and generates significant revenue through taxes and licensing fees. Regulations help to preserve the integrity and social licence of gambling in Victoria.

This RIS will detail how regulations are used to ensure gambling and gambling products minimise harm, and ensure gambling is honest and free from criminal activity.

3.1 Regulatory framework

The rules for how gambling products can operate and be used in Victoria are set out in Victoria's gambling laws. The framework includes various Acts, regulations and directives. The Act and associated regulations allow for licences and permits, technical standards and Responsible Gambling Codes of Conduct. The Commission, as the independent regulator, oversees the rules. See Section 3.5 for further details.

3.2 Licensing and permits

The Act provides for licences and permits to allow for the lawful conduct of certain gambling types, typically classified into 2 categories: Major licences, and minor licences and permits.

¹⁸ *Gambling Regulation Act 2003 (Vic)* s 3.6.12.

¹⁹ *Gambling Regulation Act 2003 (Vic)* s 3.6.11.

²⁰ *Gambling Regulation Act 2003 (Vic)* s 3.6.8.



Major licences are issued or amended by the Minister and include commercial licences for gaming machine entitlements, public lotteries, Keno, wagering and betting, monitoring of gaming, and pre-commitment (YourPlay). These licences are issued after a licensing process, and any amendments are generally made only after a formal process or application from the licensee.

The Commission has authority to issue licences and permits relating to gaming industry employees, bookmakers and bookmaker key employees, sports controlling bodies, bingo centre operators and raffles, lucky envelopes and fundraising events. It may impose conditions or amend the licences it issues.

3.3 Technical standards

The Commission, with the Minister's approval, can make and amend technical standards that:

- outline technical requirements for gaming machines
- set standards and operational requirements for the conduct of gambling in Victoria, including gaming machine entitlements, monitoring systems, pre-commitment, the casino operator, Keno, lotteries, and wagering and betting.

Technical standards are a requirement imposed on industry and typically reflect requirements of Acts and regulations, providing more detail and giving practical effect to their requirements. While the focus is ensuring integrity, consistency, return to player, and other technical aspects, they can also aid harm minimisation. For instance, the standards mandate spin rates (which are also mandated in the Act)²¹, ban autoplay on EGMs, provide for card-based cashless gaming, and require player information displays.

Technical standards for gaming machines, the Australian / New Zealand Gaming Machine National Standard and Victorian Appendix, are used by approved testers as they evaluate equipment and software before approval by the Commission.

3.4 Responsible gambling codes of conduct

Gambling licence holders must have a Responsible Gambling Code of Conduct (Code) that guides their operations to help minimise gambling harm. The Code must comply with a Ministerial Direction issued under the Act²² and be approved by the Commission. In Victoria, there are 3 Ministerial directions related to gambling codes for: gambling via bookmakers, lotteries, Keno, raffles and bingo,²³ venue operators;²⁴ and the casino operator.²⁵

3.5 Commission

As the independent regulator of Victoria's gambling industry, the Commission seeks to ensure the integrity, safety, and fairness of Victoria's gambling industry for all. Its objectives, functions and powers are set out in the *Victorian Gambling and Casino Control Commission Act 2011* (Vic). The Commission also operates under and enforces the Act, the *Casino Control Act 1991* (Vic) (Casino Control Act), and the *Racing Act 1958* (Vic) (Racing Act).

²¹ *Gambling Regulation Act 2003* (Vic) s 3.5.30.

²² *Gambling Regulation Act 2003* (Vic) s 10.6.6.

²³ *Responsible Gambling Codes of Conduct*, Victorian Government Gazette, No. S 430, 17 September 2018, <https://www.gazette.vic.gov.au/gazette/Gazettes2018/GG2018S430.pdf#page=3>

²⁴ *Responsible Gambling Codes of Conduct*, Victorian Government Gazette, No. S 85, Friday 21 February 2020, <https://www.gazette.vic.gov.au/gazette/Gazettes2020/GG2020S085.pdf#page=1>.

²⁵ *Responsible Gambling Codes of Conduct*, Victorian Government Gazette, No. S 156, Friday 31 March 2023, <https://www.gazette.vic.gov.au/gazette/Gazettes2023/GG2023S156.pdf>.



4. Defining the problem

The Gambling Regulations are sunsetting. Without these regulations the matters they prescribe will no longer be sufficiently regulated.

The key problems being addressed by the proposed Regulations are to ensure:

- gambling is conducted fairly
- gambling-related harm is reduced
- gambling products are operated with integrity
- costs to government and industry are recovered fairly.

The regulations ensure the regulatory framework continues to function and gambling activities in Victoria are conducted honestly, fairly, free from criminal influence and without causing undue harm. They continue to support harm minimisation activities, aligning with the community's evolving concerns about the availability of gambling products and their negative impacts on the community.²⁶ And they help to ensure the integrity and fairness of new and existing gambling products and assists in recovering the cost of related regulation.

4.1 Fairness of the conduct of gambling

By its very nature, gambling is a risky activity in which an individual stakes money on an outcome in the hopes of winning a prize. The degree to which a player can use their own discretion regarding the fairness of gambling varies greatly depending on the gambling product itself.

For an individual to consider a gambling product fair, they must have confidence and believe they are just as likely to win as any other person and that the odds are not 'overly stacked' towards the provider.

While the objective is to ensure individuals who gamble can do so with the confidence the activity is being conducted fairly, most gambling activities do not lend themselves to scrutiny by individuals. For example, gaming results where winning is determined by a computerised random number generator or a draw is conducted remotely, are not verifiable for fairness by a player. This means players trust the provider is genuinely offering the stated odds, prizes were appropriately drawn in a lottery, or the wagering operator has declared or paid the appropriate prize or dividend.

A failure to ensure gambling is fair involves risks for people who participate in gambling, the gambling industry and the community more generally, including:

- gambling may be exploited for criminal or other improper purposes
- people who gamble may lose financially by being cheated or otherwise unfairly deceived
- a loss of public confidence in a form of gambling used to raise funds for a particular purpose may reduce its effectiveness for that purpose
- people cease gambling for entertainment.

²⁶ Australian Gambling Research Centre, *Gambling participation and experience of harm in Australia*, (Report, 2023), <https://aifs.gov.au/research/research-snapshots/gambling-participation-and-experience-harm-australia>.



4.2 Gambling-related harm

For several decades, research has been accumulating on the effects of gambling and associated harms, such that it is now widely acknowledged gambling can be detrimental, with some gambling products posing greater risks than others.

In 2023, around 440,000 Victorians or 8.5 per cent of Victorian's population were classified as being at some risk of experiencing gambling harm,²⁷ defined as any adverse impact experienced by an individual or members of their family and friends (affected others) because of participation in gambling.²⁸ Gambling harm encompasses any negative effect gambling may have on an individual, members of their family or social network.²⁹

Major factors that contribute to harm include: the nature, quantity and accessibility of products used, the amount of money spent and able to be spent, and, in the case of more harmful products, like wagering and EGMs, the frequency of use. Promotions, inducements and advertising have also been linked to higher spend and a higher risk of gambling harm.³⁰ Additionally, it is recognised some gambling products pose greater risks than others, such as EGMs.³¹

The 2023 VPHS found that one in 10 Victorians who had a close relationship with someone who gambled were personally affected by that person's gambling, meaning people do not need to gamble to be impacted. Harms experienced because of someone else's gambling included feeling angry (61.6 per cent), feeling hopeless (53.5 per cent) and/or experiencing conflict in relationships (53.5 per cent). In Victoria, women were more likely to be affected by others' gambling, as were people from non-English speaking backgrounds.³²

4.3 Integrity of the gambling product

Without adequate oversight, the gambling industry may be subject to exploitation, which could compromise its reputation, erode public confidence, and foster unlawful activity detrimental to the community at large.

Businesses that deal with volumes of cash are vulnerable to exploitation. The Australian Institute of Criminology estimates that in 2022-23, serious and organised crime cost the Australian community up to \$68.7 billion per year.³³ Money laundering contributes to this overall cost. This is because, without a way to launder the proceeds of crime, it is difficult to use the relatively large proceeds of organised crime in the formal economy, which reduces the value of the proceeds of crime for criminals.

²⁷ A Suomi et al, above n 1, 4.

²⁸ Queensland Government, *Signs of Gambling Harm* (Webpage, January 2025), <https://www.qld.gov.au/community/getting-support-health-social-issue/gambling-harm-support/gambling-harm-signs>; See also Victorian Responsible Gambling Foundation, *Reducing Stigma: A Guide for Talking About Gambling Harm*, (March 2024), 4, https://responsiblegambling.vic.gov.au/documents/1266/FINAL_-_Gambling_harm_language_guide_-_March_2024.pdf. Gambling harm is often referenced in the context of, and measured using, a screening tool called the 'PGSI', which is commonly used by researchers to identify those at risk of gambling-related harm. Further information about the PGSI is detailed at Appendix A.

²⁹ M Browne et al, above n 16.

³⁰ Extent of promotions, inducements and advertising have also been linked to higher spend and therefore higher risk of harm or actual harm. See E McGrane et al, 'What is the evidence that advertising policies could have an impact on gambling-related harms? A systematic umbrella review of the literature (2023) 215 *Public Health*, <https://doi.org/10.1016/j.puhe.2022.11.019>.

³¹ Suomi et al, above n 1.

³² *Ibid.*

³³ Australian Institute of Criminology, *Estimating the costs of serious and organised crime in Australia, 2022-23*, (Report, 2024), https://www.aic.gov.au/sites/default/files/2025-02/sr50_estimating_the_costs_of_serious_and_organised_crime_v2.pdf.

Figure 3 shows most gambling products in Australia are classified as having a medium risk of money laundering.³⁴

Figure 3: Money Laundering risk assessment

Sector/Channel	Rating	Outlook
Casinos		
Betting agencies/corporate bookmakers		
Pubs and clubs		
Online offshore gambling		
Casino junket tour operations		
On-course bookmakers		
Legend: Very low <u>Low</u> Medium Decrease Stable		

Source: Adapted from money laundering in Australia National Risk Assessment 2024 (AUSTRAC)

4.4 Cost recovery

Victorian Government policy is that agencies providing services should aim to recover the full costs of service provision unless this would substantially undermine other important objectives. The government’s *Pricing for Value Guide* (guide) sets out the best-practice approach to undertaking pricing reviews. It is underpinned by 12 pricing principles to assist policy makers in determining an appropriate cost recovery structure for government services. It aims to create a sustainable funding source and ensure there is a consistent rationale for price levels.

The principles most relevant to services provided by the independent regulator are:

- agencies should aim to recover the full costs of service provision to promote efficient consumption
- the cost-of-service provision should be borne by those who benefit from the service
- pricing structures should be easy to understand and simple to administer.

The services and products offered by the commercial businesses that make up the gambling industry can be harmful and regulation is needed to minimise the risk of harm to those who use them. In line with the guide, it is appropriate these costs are borne by these businesses that benefit from offering gambling products.

³⁴ AUSTRAC, *Money Laundering in Australia National Risk Assessment 2024*, (Report, 2024), <https://www.austrac.gov.au/sites/default/files/2024-07/2024%20AUSTRAC%20Money%20Laundering%20NRA.pdf>.



The Act establishes that fees may be levied on gambling industry participants applying for licences and other approvals. Fees are set by prescribing a certain number of 'fee units' in regulations, which are defined in the *Monetary Units Act 2004* (Vic) and the Treasurer fixes the value of a fee unit each year.

The fees currently collected are prescribed in Part 8 of the Gambling Regulations. This fee structure was set in 2015, using a methodology whereby all direct and indirect costs for determining and processing applications were considered to determine the appropriate fee structure.

There has since been significant change in the gambling industry. Some drivers for this include:

- advancements in research, resulting in gambling harm being treated as a public health issue with broad ranging impacts over and above impacts to the individual
- questionable, and at times illegal, behaviour by gambling industry participants identified via public inquiries, such as the Royal Commission into the Casino Operator and Licence (RCCOL), and other compliance activities undertaken by the Commission
- regulatory and policy change stemming from recommendations of the RCCOL, most notably the creation of the Commission with its expanded remit and regulatory focus.

The gambling landscape has changed significantly over the last decade and the Commission's approach to harm has evolved accordingly. While fees have increased since 2015 in line with indexation, these increases have been outpaced by the true cost of regulation in the context of these changes.

5. Options

The Subordinate Legislation Act governs requirements for the preparation and making of statutory rules (i.e. regulations) and legislative instruments in Victoria.

A RIS is typically necessary when preparing regulations that impose significant economic or social burden on a sector or the public. The Subordinate Legislation Act provides that the RIS must include a statement of other practicable means of achieving the regulatory objectives, including other regulatory and non-regulatory options.³⁵

Chapter 5 considers which approaches could achieve the policy objectives, and why other options were considered and rejected.

5.1 Options development

In considering whether a proposed regulation imposes a significant economic or social burden on a sector of the public, the Subordinate Legislation Act Guidelines (Guidelines) require the Minister to consider:

- the base case (that is, the absence of the proposed rule or instrument)
- whether the proposed statutory rule or legislative instrument imposes a burden on one or more sectors of the public
- whether the burden is a 'significant economic or social burden'.³⁶

³⁵ *Subordinate Legislation Act 1994* (Vic) s 10(1)(c).

³⁶ Department of Premier and Cabinet (Vic), *Subordinate Legislation Act 1994 Guidelines* (September 2023), 25.



The Guidelines recommend options be prepared for consideration, including co-regulation and non-regulatory approaches, and those that reduce the burden on industry and/or the community. The consultation detailed at Section 1.4.1 informed identification of feasible options for this RIS.

5.2 Options considered in this RIS

Options have been developed for each key area for the proposed Regulations: gaming machines; wagering and betting; trade promotion lotteries; community and charitable gaming; and fees.

The non-regulatory and regulatory options considered in this RIS are:

- **Base case:** The regulations sunset and are not remade.
- **Option 1:** The current regulations are remade with minor amendments.

An additional option was considered in relation to fees, which is to align the fees with new regulatory costs. The fee options are discussed separately in Chapter 8.7.

5.2.1 Base case: No regulations

In the base case, the Gambling Regulations would not be replaced once they sunset. The Act would continue to regulate these areas, to an extent, but no additional matters would be prescribed under the Act.

This would mean matters such as standards, conditions and functions for matters relating to gaming machines, wagering and betting, trade promotion lotteries, community and charitable gaming would no longer be prescribed. There would be no specific regulation to cover these matters and the Act would not work as intended because the regulations to support how it operates would not exist.

For example, the Act declares trade promotion lotteries lawful if they are conducted in accordance with the Act and any prescribed conditions.³⁷ The Act then provides details on what must not be required in order to enter a trade promotion lottery.³⁸ All of the additional requirements around the conduct of trade promotion lotteries are contained in the Gambling Regulations as prescribed conditions. Without the Gambling Regulations, the Act only provide for one element of the conduct of trade promotion lotteries, rather than all of the elements that are required for the integrity of the product.

5.2.2 Option 1: Remake the current regulations

Option 1 involves remaking the Gambling Regulations with minor amendments.

5.3 Out of scope

This RIS considered, but did not progress, options related to the:

- bingo sector, as the government is considering the findings of the Commission's inquiry into the bingo sector³⁹ regulation of Victorian bookmakers,⁴⁰ which requires a multi-agency

³⁷ *Gambling Regulation Act 2003* (Vic) s 5.2.7.

³⁸ *Gambling Regulation Act 2003* (Vic) s 5.2.7(2).

³⁹ Victorian Gambling and Casino Control Commission, *Commission Inquiries* (Web page, 26 March 2025), <https://www.vgccc.vic.gov.au/for-community/commission-inquiries>.

⁴⁰ Public Accounts and Estimates Committee, *Gambling and liquor regulation in Victoria: a follow up of three Auditor-General reports* (Parliament of Victoria, November 2023), 165 and Finding 85, <https://www.parliament.vic.gov.au/get-involved/inquiries/gamblinginquiry/reports>.

broader review with complex interdependencies with other portfolios and takes this issue beyond the scope of this RIS.

Furthermore, provisions of the Gambling Regulations that are explanatory for interpretation purposes, and do not impose a burden, are not assessed.

The regulations relating to prescribed connections, which define relationships between one entity and others in the context of gaming machine ownership, are not assessed. This is because the regulations relating to prescribed connections do not impose a burden, as they are definitional only. The burden in relation to prescribed connections is contained in the Act itself. If the Gambling Regulations were to sunset, the requirements would remain and the interpretation of the definition could still occur. While amendments to these provisions are proposed in the proposed Regulations, these are technical in nature, in that the proposed Regulations have been restructured to be clearer.

Other regulations not assessed include definitional or explanatory regulations relating to:

- restricted gaming components and monitoring gaming components in gaming machines⁴¹
- daily net cash balance⁴² and revenue⁴³ which are definitions used to determine tax payable by venue operators operating gaming machines⁴⁴
- the content to be included in publication of notices.⁴⁵

The *Gambling Legislation Amendment (Pre-commitment and Carded Play) Act 2025* was passed by Parliament on 7 May 2025. It received Royal Assent on 3 June 2025. The Gambling Legislation Amendment (Pre-commitment and Carded Play) Act established the necessary framework for the phased implementation of mandatory account-based play and pre-commitment on gaming machines. Supporting regulations⁴⁶ to implement a trial of these reforms were made on 1 October 2025 and expired on 15 December 2025, following the conclusion of the trial. Further supporting regulations will be required to implement the reforms.

6. Assessment approach

Chapter 6 details the 4 assessment criteria against which option was assessed, the expected impacts (benefits and costs) of feasible options and how the preferred option was decided.

6.1 Assessment criteria

The assessment criteria include four criteria against which each option is assessed. Each criterion is weighted. The costs and benefits have been weighted at 50 per cent each in line with Better Regulation Victoria's guidance note.⁴⁷

⁴¹ Gambling Regulations 2015 (Vic) regs 37 and 38.

⁴² Note: The daily net cash balance is the total wagered amount on a day, minus the total amount of prizes paid from that amount, excluding any amounts paid to the jackpot special prize pool. *Gambling Regulation Act 2003* (Vic) s 3.6.2.

⁴³ Note: Gaming machine revenue is the total amount wagered on gaming machines less the value of prizes and less a prescribed amount of money allocated to jackpot pools.

⁴⁴ Gambling Regulations 2015 (Vic) reg 41.

⁴⁵ Gambling Regulations 2015 (Vic) regs 39, 40 and 88.

⁴⁶ Gambling Regulation (Pre-commitment Trial) Regulations 2025.

⁴⁷ Better Regulation Victoria, *Guidance Note: Multi-Criteria Analysis*, 3.



Effectiveness to reduce gambling harm, protecting the integrity of the product and the impact on participant experience are the criteria considered to be a benefit, so are weighted at 50 per cent together.

As the primary purpose of the proposed Regulations is to protect the integrity of the gambling product, this criterion has been given the highest weighting out of the three criteria relating to benefits. Effectiveness to reduce gambling harm was given the second highest weighting given the importance of reducing harm. The impact on participant experience was given the lowest weighting as a relevant consideration to ensure the proposed Regulations do not negatively impact on the participant experience.

6.1.1 Effectiveness to reduce gambling harm

The first criterion is an assessment on the effectiveness of reducing gambling harm. The aim of regulation to reduce gambling harm is to:

- limit player losses
- limit inducements to gamble
- reduce the risk of people becoming classified as problem gamblers.

This criterion is weighted at 15 per cent.

6.1.2 Protects the integrity of the product

The second criterion is an assessment of whether the option protects the integrity of the product. Integrity ensures appropriate controls are in place to:

- reduce the risk of improper or criminal exploitation
- ensure gambling is conducted fairly and transparently to those who participate in gambling.

To manage the risk of improper or criminal exploitation in the gambling industry, people who need to access gambling equipment and provide gambling products must be assessed as being suitable to undertake these functions. This is done through licensing and the application of permits to conduct gambling.

Fairness ensures people participating in gambling are not cheated or otherwise disadvantaged. Without fairness, there is likely to be reputational damage to gambling as a recreational activity. This would undermine the gambling industry and impact the benefits of gambling for community and charitable organisations.

In terms of applying fairness to the integrity of the product, it is important that a participant can know the rules under which the gambling must be conducted to be fair.

A failure to ensure integrity in the gambling industry may result in:

- exploitation of gambling for criminal or other purposes
- the cheating of participants so they lose financially or are otherwise deceived
- a loss of public confidence in the product, the purpose of participating (for example, to raise funds for a community purpose) and the industry.

This criterion is weighted at 30 per cent.

6.1.3 Impact of participant experience

The third criterion is an assessment of the impact on participant (gambling product users) experience. This element looks at the participant experience to make sure the regulations do not



have a disproportionate impact on that experience. Elements that go to making the participant experience better include signage, adequate information about products and the rules and publication of results.

This criterion is weighted at 5 per cent.

6.1.4 Cost to government and to industry

The fourth criterion is an assessment of the cost to government and industry of complying with regulatory requirements. As there are no transitional costs required through the options, these costs are related to the ongoing costs of compliance and the opportunity cost of foregone revenue, relative to the base case.

This criterion is weighted at 50 per cent.

6.2 Approach to assessment

Each proposal was scored against the assessment criteria using a scale of -10 to +10 compared to the base case, which is scored zero. Benefits are assigned positive scores and costs are assigned negative scores relative to the base case.

Scores are assigned as follows:

- 1 to 3 – low impact
- 4 to 6 – moderate impact
- 7 to 10 – high impact.

These scores are multiplied by the weight of the criterion to provide an overall score that results in a ranking of the options below, to arrive at the preferred option.

An assessment of each option (base case and Option 1) against the criteria has been undertaken for each gambling type: gaming machines; trade promotion lotteries; bingo; lucky envelopes; raffles; and commercial raffle organisers. In the case of gaming machines, regulations have been grouped by sub-categories and assessed in these groupings.

7. Assessment – Gaming machines

Gaming machines are a high-risk product associated with significant gambling harm.⁴⁸ Key factors that can contribute to levels of harm include:

- the accessibility⁴⁹ and features⁵⁰ of gaming machines
- the physical environment of the gaming room, including lights and sounds⁵¹

⁴⁸ C. R. Stone et al, 'Gambling in Victoria: Changes in Participation, Problem Gambling and Gambling Environment Between 2008 and 2018' (2024) *Journal of Gambling Studies* 40, <https://link.springer.com/article/10.1007/s10899-024-10282-x>.

⁴⁹ M.T. Alex et al, 'Electronic gaming machine accessibility and gambling problems: A natural policy experiment' (2023) *Journal of Behavioral Addictions* 12, <https://akjournals.com/view/journals/2006/12/3/article-p721.xml>.

⁵⁰ Schottler Consulting, (2019) 'Literature review of the impact of EGM characteristics on gambling harm' NSW Responsible Gambling Fund November, <https://www.gambleaware.nsw.gov.au/-/media/files/literature-review-of-gaming-machine-characteristics-edited-20-1-2020.ashx>.

⁵¹ Schottler (2019) Ibid; M. Rockloff et al, 'EGM environments that contribute to excess consumption and harm', (2015) Victorian Responsible Gambling Foundation Victoria, <https://responsiblegambling.vic.gov.au/documents/71/Research-report-egm-environments-that-contribute-to-excess-consumption.pdf>.

- uninterrupted or continuous play⁵²
- loyalty schemes and other potential or perceived possible incentives to gamble⁵³
- a person’s mental or physical health status.⁵⁴

A number of these factors are addressed in other instruments and outside of these regulations, such as legislation mandating minimum closing periods for gaming rooms in hotels and clubs,⁵⁵ the reduction of spin rates on new EGMs⁵⁶ and the regulation of loyalty schemes.⁵⁷

For assessment purposes, gaming machine regulations in the proposed Regulations have been broken into sub-categories aligned to their purpose or theme related to the physical environment, the availability of information and advertising and signage.

7.1 Physical environment

Dissociation, often known as ‘going into the zone’, is a term used to describe an altered state of reality. A small proportion of individuals who gamble, particularly when using EGMs, tend to dissociate from their surroundings, which causes them to lose track of time and money spent.

Research suggests the physical environment and the inherent features of EGMs (such as flashing lights, music and the masking of losses as wins) may provoke dissociative episodes.⁵⁸

‘Slot machines (gaming machines) are a very popular form of gambling in which a small proportion of gamblers experience gambling-related problems. These players refer to a trance-like state that researchers have labelled ‘dark flow’—a pleasurable, but maladaptive state where players become completely occupied by the game.’⁵⁹

Like other hospitality businesses, gaming venue operators often invest resources to create inviting environments for their customers. However, due to the nature of their industry, gaming venue operators also contemplate whether the environment they create will encourage players to stay longer and spend more on gaming machines. Industry design consultants promote lighting and design as ways to encourage extended game play.

⁵² V. Kesaite, et al, ‘Gambling consumption and harm: a systematic review of the evidence’ (2024) *Addiction Research & Theory*, 32:3, <https://www.tandfonline.com/doi/full/10.1080/16066359.2023.2238608>; A Harris and MD Griffiths, ‘The Impact of Speed of Play in Gambling on Psychological and Behavioural Factors: A Critical Review’ (2018) *Journal of Gambling Studies*. 34(2), <https://pmc.ncbi.nlm.nih.gov/articles/PMC5938312/>.

⁵³ P. Delfabbro and D.L.. King, ‘The prevalence of loyalty program use and its association with higher risk gambling in Australia’ (2020) *Journal of Behavioral Addictions*, 9(4) <https://akjournals.com/view/journals/2006/9/4/article-p1093.xml>; C. Livingstone et al, ‘Identifying effective policy interventions to prevent gambling-related harm’, (2019) Victorian Responsible Gambling Foundation, Melbourne <https://responsiblegambling.vic.gov.au/resources/publications/identifying-effective-policy-interventions-to-prevent-gambling-related-harm-640/>.

⁵⁴ D. Moreira et al, ‘Risk Factors for Gambling Disorder: A Systematic Review’ (2023) *Journal Gambling Studies*, 39(2), <https://pmc.ncbi.nlm.nih.gov/articles/PMC9994414/>; J. Haw J et al., ‘Gambling and Co-morbid Disorders’ (2013) Gambling Research Australia, <https://www.gamblingresearch.org.au/publications/gambling-and-co-morbid-disorders>.

⁵⁵ *Gambling Regulation Act 2003* (Vic) s 3.5.28A.

⁵⁶ *Gambling Regulation Act 2003* (Vic) s 3.5.30.

⁵⁷ *Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations 2025*.

⁵⁸ K.R. Barton et al, ‘The Effect of Losses Disguised as Wins and Near Misses in Electronic Gaming Machines: A Systematic Review’ (2017) *Journal of Gambling Studies* 33, <https://doi.org/10.1007/s10899-017-9688-0> and M Cherkasova et al, ‘Win-Concurrent Sensory Cues Can Promote Riskier Choice’ (2018) *Journal of Neuroscience* 38 (48), <https://doi.org/10.1523/JNEUROSCI.1171-18.2018>.

⁵⁹ T. B. Kruger, et.al, *Contrasting Mind-Wandering, (Dark) Flow, and Affect During Multiline and Single-Line Slot Machine Play* (2022) *Journal of Gambling Studies* 38, <https://doi.org/10.1007/s10899-021-10027-0>.



'By dimming the overall brightness of a venue, the right lighting can create a timeless atmosphere that knows neither day or night. (A great way to encourage the ultimate adult luxury—having nowhere to be and forgetting all sense of time).'⁶⁰

Gaming venue lighting requirements were introduced via regulations in Victoria in 2001. Before then, many venues lacked natural light (often covering external windows) and had low levels of artificial light. Research suggests “game play duration and total spend increase when ambient lighting is dim (vs. bright)”.⁶¹

7.1.1 Overview of the regulations that prescribe physical requirements

Governments in all Australian jurisdictions have implemented policies to help prevent players entering a dissociated state or engaging in harmful extended play.

The Gambling Regulations prescribe requirements for a gaming venue's physical environment that seek to ensure EGM users are aware of time and their surroundings, including requirements to:

- ensure gaming machine area lighting complies with the prescribed illuminance (lighting) any time an EGM is available for gaming⁶²
- ensure the casino operator designates non-gaming parts of the casino for the comfort and convenience of EGM users⁶³
- not remove wholly or partly a window that provides a view outside from the EGM area in an approved venue, or from a position in front of the gaming machine in a casino, unless the operator is repairing or replacing the window⁶⁴
- not obscure a window, unless it is treated for temperature control or the reduction of glare⁶⁵
- clearly, accurately and continuously display the time on gaming machines, while they are operating and available for use⁶⁶
- generate and display electronic information (electronic game information and electronic player information) on gaming machines.⁶⁷

7.1.2 Base case

Under the base case, the regulations would sunset and not be remade. There would be no lighting requirements, designated non-gaming areas for casino patrons, and no time and date

⁶⁰ Capital Design Works, [The psychology behind gaming room design for clubs and hotels](https://www.capitaldesignworks.com.au/reviewing-the-key-points-behind-gaming-psychology-2/). (Webpage, accessed 13 June 2025), <https://www.capitaldesignworks.com.au/reviewing-the-key-points-behind-gaming-psychology-2/>.

⁶¹ J Ilicic, and S. M. Baxter, 'Hidden in the Dark: Dim Ambient Lighting Increases Game Play Duration and Total Spend' (2021) *Journal of Gambling Studies* 37, <https://doi.org/10.1007/s10899-019-09921-5>.

⁶² Gambling Regulations 2015 (Vic) reg 8.

⁶³ Gambling Regulations 2015 (Vic) reg 9.

⁶⁴ Gambling Regulations 2015 (Vic) reg 10.

⁶⁵ Gambling Regulations 2015 (Vic) reg 10.

⁶⁶ Gambling Regulations 2015 (Vic) reg 19.

⁶⁷ Gambling Regulations 2015 (Vic) reg 20. Electronic game information includes for example, the average number of individual games played for each win, the odds of achieving the 5 most valuable and 5 least valuable winning combinations and the maximum and minimum bet options. The electronic player information includes for example, the amount of money the player has put into the gaming machine, the amount of money wagered and the difference between the credits won and credits played.



displays on gaming machines. This would go against established harm minimisation policies and could lead to an increase in harm.

If the regulations sunset, gaming venue and the casino operators could dim lights and remove or cover windows, which could lead users to have more dissociative episodes and extended gaming sessions. Removing designated non-gaming areas at the casino could lead to an increase in harm, no longer offering a space to take a break from gambling break and space to make more rational decisions away from the gaming environment. And the absence of time and date displays on EGMs could contribute to users losing awareness and entering a dissociated episode.

7.1.3 Option 1

Option 1 is to remake Part 3, Division 2 and 4 of the Gambling Regulations with minor technical amendments. The technical amendments include minor typographical amendments only.

Effectiveness to reduce gambling harm

Option 1 is scored as +6, as the regulations are intended to prevent users of gaming machines from experiencing dissociation or “going into the zone”, which results in extended gaming sessions and increased losses.

Option 1 provides lighting requirements, so gaming rooms do not have dim lights. Poor lighting has been identified as a possible risk factor for problematic gambling, as EGM users may be more likely to become detached from their surrounds and are at greater risk of spending more money and time using EGMs than they would if they were otherwise more connected to their external environment. This can adversely affect a user’s ability to make rational decisions about their gambling behaviour and can also pose a safety risk (for example, create tripping hazards) to themselves and staff.

Option 1 seeks to minimise gambling harm by requiring lighting levels to be controlled, natural light to remain unobstructed or intact wherever it exists, casino EGM users to have a space to take a break away from casino activities and the time and date to be displayed clearly on all gaming machines. These controls provide a direct link between the user and their external surrounds, minimising the risk of dissociation and ensuring opportunities for a user to be aware of the time of day, able to keep track of time while gambling and ensure a place to break the momentum, when needed, during gambling.

Protects the integrity of the gaming product

The provisions that relate to a gaming venue’s physical environment are not intended to protect the integrity of the gaming product. As such, they do not impact integrity and are scored at zero.

Impact on participant experience

Option 1 is scored at +3. The provisions positively impact participant experience by ensuring lighting in gaming venues is not deceptive as to the time of day and EGM users have a dedicated place to relax away from gambling activities.

Designated non-gaming areas provide EGM users at the casino with a comfortable place to relax, a place to make more rational decisions away from gambling areas.

Cost to government and industry

Option 1 is scored at -2. While there is an additional cost to industry to design gaming rooms that comply with lighting standards, that cost should be minimal and already absorbed by existing venues.



There would be additional design considerations if a new venue entered the market or if an existing venue undergoes renovations, potentially resulting in increased costs. A venue must ensure its gaming room design complies with the lighting requirements.

Requiring venues to have brighter lighting to discourage dissociation may have revenue impacts on venue operators, as compared to the base case. However, this revenue impact is considered proportionate to the harm that would occur if lighting levels were unregulated.

7.1.4 Multi-criteria assessment – Physical environment

Table 3: Multi-criteria assessment – Physical environment

Criteria	Weighting	Base case No regulation		Option 1 The existing arrangements	
		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	+6	+0.9
Protects the integrity of the product	30%	0	0	0	0
Impact on participant experience	5%	0	0	+3	+0.15
Costs to government and to industry	50%	0	0	-2	-1
Total score	100%		0		+0.05

Recommendation

Option 1 is the preferred option. It recommends that Part 3, Divisions 2 and 4 of the Gambling Regulations are remade with minor technical amendments. The advantages of minimising gambling-related harm and protecting safety outweigh minimal costs to industry and government.

7.2 Availability of information

Gaming machines are a game of chance; there is no skill required and nothing users can do to increase their odds of winning. The choice of how many lines to play is up to the user, but once a user presses the button to gamble, the machine generates random numbers and the user either wins or loses based on the symbol combination displayed.

Many EGM users hold false beliefs, despite these facts. Common misconceptions include the idea that venues know when jackpots will go off, EGM users can control the outcome of a game using specific strategies and the type of machine can affect results.⁶⁸

In 2010, the Productivity Commission Inquiry into Gambling observed that:

‘Poor information or misunderstandings about a product may cause people to buy too much (or too little) or to misuse that product to their detriment, compared to a situation in which they were well informed. For example, cognitive misperceptions about some forms of gambling may fool people into playing for longer to make up past losses, or in the mistaken

⁶⁸ Gamblers Help Queensland, *Gambling Facts and Myths* (Webpage, accessed 13 June 2025). <https://gamblinghelpqld.org.au/facts-and-myths/>



belief that they can win in the long run on pure games of chance that have a house advantage.⁶⁹

A responsible gambling and harm minimisation approach requires providing sufficient information to EGM users to enable them to make informed, educated decisions about gambling. Measures include displaying and providing brochures and posters that provide information about the pre-commitment scheme (YourPlay). Information on support services for people who gamble is also provided.

All Australian jurisdictions require some form of responsible gambling messaging to be accessible in gaming venues, with requirements existing in Victoria for over 20 years. The aims are to ensure EGM users are unable to avoid responsible gambling information, dispel myths and provide users with access to information on money and time spent at a gaming machine. It also informs users about the pre-commitment scheme and available support services.

Community education is not presented as an alternative to regulation; rather, it serves as a complementary measure.

7.2.1 Overview of the regulations about availability of information

The Gambling Regulations provide limited exceptions from the Act's strict advertising requirements and dictate how YourPlay and other player information must be displayed at gaming machine venues throughout Victoria. The regulations provide that:

- the Minister may make player information standards setting out information and the required form of player information materials to be displayed in gaming venues and the casino⁷⁰
- player information posters must be displayed in such a manner that the information is clearly visible to a person sitting or standing in front of a gaming machine⁷¹
- player information signs must be displayed to be clearly visible from the front of an EGM⁷²
- player information and YourPlay brochures must be available at each venue cashier area⁷³
- the Commission provides YourPlay and other player information to the casino and venue operators on request.⁷⁴

The Gambling Regulations provide that the Minister determines the form and content of the player information, which is published on the Commission's website.⁷⁵ It is an offence to alter the form of information set out in player information standards.⁷⁶ These regulations ensure consistent messaging across venues and help venues to meet the requirements of the Regulations.

⁶⁹ Productivity Commission, *Gambling*, (Report no 50, 26 February 2010) vol 1. <https://www.pc.gov.au/inquiries/completed/gambling-2010/report/gambling-report-volume1.pdf>

⁷⁰ Gambling Regulations 2015 (Vic) reg 11.

⁷¹ One poster must be displayed per 15 machines. See Gambling Regulations 2015 (Vic) reg 12.

⁷² Gambling Regulations 2015 (Vic) reg 13.

⁷³ Brochures available at the cashier must be at least equal to the number of gaming machines approved in the venue. See Gambling Regulations 2015 (Vic) reg 14; Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations 2014 (Vic) reg 14.

⁷⁴ Gambling Regulations 2015 (Vic) regs 15–16.

⁷⁵ Gambling Regulations 2015 (Vic) reg 11.

⁷⁶ Gambling Regulations 2015 (Vic) reg 17.



The Gambling Regulations require gaming industry employees⁷⁷ to complete training called Responsible Service of Gaming (RSG).⁷⁸ The Minister specifies the content of the four training modules.⁷⁹ RSG training provides gaming staff with information and skills so they can provide gambling responsibly and identify and respond to signs of gambling harm displayed by users of EGMs. This training ensures that all staff across Victoria receive the same, and consistent training in this important area.

7.2.2 Base case

Under the base case, the existing regulations would sunset, the existing player information standards and printed information requirements that mandate responsible gambling signage, posters, signs and player information brochure requirements would no longer be in effect. It would no longer be a requirement for gaming industry employees to complete RSG training.

The base case would make it more difficult for EGM users to access reliable information, potentially leading to a decline in effective gambling harm messaging and the risk of outdated or incorrect information being provided to EGM users.

Governments agree responsible gambling messaging supports both recreational and at-risk gamblers by providing information on strategies to manage gambling sessions, support services, and on the products, gaming machines. All Australian jurisdictions require these messages to be available and displayed on-site in some way.

The base case would provide less information and skills to staff to provide gaming responsibly and to identify and respond to signs of gambling harm.

7.2.3 Option 1

Option 1 is to remake Part 3, Division 3 and 4 of the Gambling Regulations with minor technical amendments. The technical amendments consist of minor typographical amendments.

Effectiveness to reduce gambling harm

Option 1 is scored at +3. The regulations will continue to ensure responsible gambling posters and signs, including YourPlay messaging, are displayed and arranged in a way that makes them easily visible and accessible to EGM users. The regulations:

- require player information posters and signs to be clearly visible
- require player information brochures to be available in all gaming venues
- allow the Minister to make player information standards and determine their form and content.

Allowing the Minister to make player information standards provides flexibility to update the standards, which include the design information, in a more timely and efficient manner than through the amendment of regulations.

Option 1 provides for the training of staff to identify and respond to gambling harm in EGM users. This is an important tool in the reduction of gambling harm.

⁷⁷ Venue operator, nominee of a venue operator, holder of a gaming industry employee licence and people who work in a gaming machine area of a venue or have more than incidental contact or interaction with users of EGMs.

⁷⁸ Gambling Regulations 2015 (Vic) regs 123, 123A.

⁷⁹ Gambling Regulations 2015 (Vic) reg 124.



Protects the integrity of the gaming product

This matter is not relevant for the purpose of this assessment and is scored as zero.

Impact on participant experience

Option 1 is scored at +2 It provides EGM users access to harm minimisation resources, which empowers users to make informed choices about their gambling, enhancing their experience.

Option 1 ensures gaming industry employees are trained to identify and respond to gambling harm, which in turn will improve the experience of a person experiencing gambling harm through receiving this support from trained staff.

Cost to government and industry

Option 1 is scored at -0.5 due to its minimal impact. It does not impose any additional costs on the Commission, industry or government above current costs, which are relatively low. There is no evidence these measures have a revenue impact on industry, but it is possible for there to be an impact if users change their gambling behaviour and reduce their spend because they are better informed about the risks associated with gambling.

The Commission estimates it costs \$12,000 per year to produce posters, signs, and brochures and \$5,000 per year to distribute them to all hotels and clubs across Victoria.⁸⁰ It provides hotels and clubs with hard copies and the costs incurred are recovered from venue operators as part of the supervision charge.

The casino operator prints its own materials to the Commission’s specifications.

Gaming venue and casino staff must complete responsible service of gambling training, which may incur costs to industry related to staff time, if staff are paid to attend this training or costs to the individual if they complete this training on their own time and are not paid for attending. This cost has not been evaluated, but is considered minimal relative to the costs associated with running a venue.

7.2.4 Multi-criteria assessment – Availability of information

Table 4: Multi-criteria assessment – Availability of information

Criteria	Weighting	Base case No regulation		Option 1 The existing arrangements	
		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	+3	+0.45
Protects the integrity of the product	30%	0	0	0	0
Impact on participant experience	5%	0	0	+2	+0.1
Costs to government and to industry	50%	0	0	-0.5	-0.25
Total score	100%		0		+0.3

⁸⁰ The Commission’s estimates do not include internal resourcing costs, including FTE to manage the process.

Recommendation

Option 1 is preferred. It is recommended Part 3, Division 3 of the Gambling Regulations be remade with minor technical amendments. The regulations increase uniformity with other Australian jurisdictions and ensure EGM users can easily access onsite information about help services, pre-commitment and gambling products.

7.3 Advertising and signage

All Australian jurisdictions impose strict requirements in respect of gaming machine advertising, including any marketing communications directed towards loyalty members or the public that mention EGMs. Gaming machine advertising means any form of advertising that contains any information, term, expression, symbol or other thing associated with EGMs. The underlying concern is signs and advertisements drawing attention to EGM availability potentially have a stimulatory impact on those that are susceptible to gambling harm.

The current provisions were developed in consultation with gambling and community representatives and have been in place for over 10 years.

7.3.1 Overview of the regulations about advertising and signage

The Act prohibits:

- a venue operator, or a person acting on their behalf, from publishing or allowing someone else to publish any gaming machine advertising outside the gaming machine area of an approved venue, except where the advertisements are allowed under regulations⁸¹
- printing any gaming machine advertising on player cards⁸²
- any person from displaying gaming machine related signs that draws attention, or can reasonably be taken to draw attention, to EGM availability for gaming or uses a term or expression frequently associated with gaming machines.⁸³

The Act does allow venue operators to share EGM advertising with someone who has requested it in writing.

The Gambling Regulations provide some exemptions, including for:

- some signage in gaming venues and at the Melbourne casino⁸⁴
- a sign with the word 'Pokies' to be located on an approved venue⁸⁵
- directional signage to EGM areas in the casino and at the entrance and in EGM venues⁸⁶
- a single additional directional sign for a club gaming venue if the club is not located on a freeway or arterial road⁸⁷
- a sign for a trade promotion or event or convention for the gaming machine industry⁸⁸

⁸¹ *Gambling Regulation Act 2003 (Vic)* ss 3.5.34AA and 3.5.34.

⁸² *Gambling Regulation Act 2003 (Vic)* s 3.5.34AC.

⁸³ *Gambling Regulation Act 2003 (Vic)* s 3.5.35.

⁸⁴ *Gambling Regulations 2015 (Vic)* reg 28.

⁸⁵ *Gambling Regulations 2015 (Vic)* reg 29. Note, more than one sign is allowed, if the venue has more than one street frontage.

⁸⁶ *Gambling Regulations 2015 (Vic)* reg 30.

⁸⁷ *Gambling Regulations 2015 (Vic)* reg 31.

⁸⁸ *Gambling Regulations 2015 (Vic)* reg 32.



- corporate logo use and for Crown Melbourne, use of the word 'CROWN' and its symbol⁸⁹
- signs relating to problem gambling, services relating to problem gambling and responsible gambling.⁹⁰

7.3.2 Base case

Under the base case the existing regulations would sunset. In the absence of any regulations for advertising and signage, the Act would operate to prohibit gaming machine related signage and advertising for approved venues and the casino. However, no exemptions would apply, meaning the casino would be unable to use its local branding or 'CROWN' name, and signage would be banned. Approved venue operators are only permitted to use their name in advertising, provided that it is not associated with gaming machines.

While most signage exempted by the regulations serve a directional purpose, the exemptions also permit the display of harm minimisation and YourPlay messaging.

7.3.3 Option 1

Option 1 is to remake Part 3, Division 7 of the Gambling Regulations with minor amendments consisting of minor typographical changes and clarifications to signage outside gaming venues.

The changes to signage outside of gaming venues, clarifies the meaning of decorative illumination which excludes illumination that is functional but will include features such as flashing or coloured lights.

Effectiveness to reduce gambling harm

Option 1 is scored at -1 The current exemptions provide for responsible gambling signage to be displayed and permit a limited amount of directional signage. Providing responsible gambling signage contributes to reducing gambling harm. Allowing the regulations to sunset would result in players missing out on important responsible gambling messaging.

However, directional signage, which makes venues more visible and therefore accessible to users, may increase the possibility of harm. On balance, it is considered that the harm caused by enabling directional signage and limited advertising for gambling venues outweighs the positive impact of the provisions related to problem and responsible gambling signage. As such, Option 1 is scored at -1.

Protects the integrity of the gaming product

For this assessment, it has been determined that advertising and signage is not relevant and will not have any impact on protecting the integrity of the product. For this reason, it is scored zero.

Impact on participant experience

Option 1 is scored at +3. Existing arrangements allow people who wish to gamble to locate gaming rooms easily. The removal of directional signs is likely to have a negative impact on player experiences.

⁸⁹ Gambling Regulations 2015 (Vic) regs 33–36.

⁹⁰ Gambling Regulations 2015 (Vic) regs 34–35.



Cost to government and industry

Option 1 is scored at +5.⁹¹ This score is based on the casino being restricted from using its name and logo in the base case, which would significantly impact its operations and could impact its ability to function as a business. Enabling the casino to use its name and logo ensures that it is not placed at a competitive disadvantage relative to other casinos domestically and internationally (as it would be under the base case). As a prominent entertainment venue and tourist destination, Crown Melbourne encompasses a casino, restaurants, accommodation, movie theatres, and conference facilities, attracts over 20 million visitors each year⁹² and is a significant employer.

Signs indicating the location of EGMs may also be important for the commercial viability of venues to indicate their offering to potential customers. This could result in more revenue than if there was no signage at all to indicate where there are EGMs on premises.

7.3.4 Multi-criteria assessment – Advertising and signage

Table 5: Multi-criteria assessment – Advertising and signage

Criteria	Weighting	Base case No regulation		Option 1 The existing arrangements	
		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	-1	-0.15
Protects the integrity of the product	30%	0	0	0	0
Impact on participant experience	5%	0	0	+3	+0.15
Costs to government and to industry	50%	0	0	+5	+2.5
Total score	100%		0		+2.5

Recommendation

Option 1 is preferred. It is proposed that Part 3, Division 7 of the Gambling Regulations be remade to ensure the casino can use its name and logo and to provide harm minimisation posters and talkers and for minimal signage in gaming venues. Option 1 maintains an appropriate balance between harm minimisation and the legitimate pursuit of recreational gambling.

⁹¹ The assessment of costs is usually allocated a negative score. In this section the costs are scored positively due to this option resulting in greater revenue for industry than the base case. Under the base case the Act prohibits advertising and signage. As this option provides exemptions to this ban, the scoring has been inverted for this reason.

⁹² Crown Melbourne, [About us](#) [website], accessed 30 June 2025.



8. Assessment – Other gambling product types

8.1 Wagering and betting

Wagering and betting involves placing a wager or bet on race events, sporting events or other approved betting events. In 2023-24, Victorians lost \$2.51 billion on wagering and betting.⁹³

Betting on horse, harness or greyhound racing is the third most common gambling type in Victoria, with 12.9 per cent of the Victorian population participating.⁹⁴ It is the gambling activity with the highest mean expenditure for the Victorian gambling population at \$5,915 per year.⁹⁵

Sports betting is the sixth most common gambling type in Victoria, with 5.1 per cent of the population participating.⁹⁶ It is a high-frequency (weekly or more) gambling activity⁹⁷ and has the second highest expenditure at \$3,231 per year.⁹⁸ Sports betting has the highest proportion of online-only participation, at 84 per cent.⁹⁹

8.1.1 Overview of the regulations about wagering and betting

The Act allows licenced wagering and betting through the issuing of a wagering and betting licence, the approval of betting competitions, the issuing of permits to conduct on-course wagering, imposing controls over the conduct of wagering and betting competitions and regulating the publication and use of race fields.¹⁰⁰

The Gambling Regulations prescribe additional requirements for wagering and betting. They provide for matters relating to the conduct of wagering and betting,¹⁰¹ including:

- displaying betting rules where bets are accepted¹⁰²
- the management and control of betting offices by a person appointed for that purpose¹⁰³
- the allotment of numbering and bracketing of selections in a totalisator¹⁰⁴
- providing information regarding selections, dividends and prizes¹⁰⁵
- displaying results and the dividends or prizes¹⁰⁶
- payment of dividends in the event of a protest¹⁰⁷

⁹³ Victorian Gambling and Casino Control Commission 'Annual Victorian player loss and taxes paid by category 2023-24' (Dataset, Victorian Gambling and Casino Control Commission, 23 May 2025), <https://www.vgccc.vic.gov.au/for-community/gambling-victoria/gambling-data#annual-victorian-player-loss-and-taxes-paid-by-category>.

⁹⁴ A Suomi et al, above n 1, 22.

⁹⁵ A Suomi et al, above n 1, 34.

⁹⁶ A Suomi et al, above n 1, 23.

⁹⁷ A Suomi et al, above n 1, 29.

⁹⁸ *Ibid.*

⁹⁹ A Suomi et al, above n 1, 38.

¹⁰⁰ *Gambling Regulation Act 2003* (Vic) s 4.1.1.

¹⁰¹ Operator means both the wagering and betting licensee and the wagering and betting operator.

¹⁰² *Gambling Regulations 2015* (Vic) reg 44.

¹⁰³ *Gambling Regulations 2015* (Vic) reg 45.

¹⁰⁴ *Gambling Regulations 2015* (Vic) reg 46.

¹⁰⁵ *Gambling Regulations 2015* (Vic) reg 47.

¹⁰⁶ *Gambling Regulations 2015* (Vic) reg 48.

¹⁰⁷ *Gambling Regulations 2015* (Vic) reg 49.



- the allocation of payments into pools for totalisator or approved betting competition¹⁰⁸
- the provision of information on tickets¹⁰⁹
- reporting significant events to the Commission, including an error in the calculation of a dividend or prize, an acceptance of a bet after the start of an event or forged tickets¹¹⁰
- processes to ensure the termination of acceptance of bets.¹¹¹

The Gambling Regulations also provide for matters relating to applying for publication approval of race fields.¹¹²

8.1.2 Base case

Under the base case, the regulations would sunset and not be remade.

This would mean the wagering and betting matters in the Gambling Regulations would no longer apply. Operators would no longer have to display betting rules, results, dividends or prizes. Further, there would be no process for applying to publish race fields.

The related provisions in the Act would remain in force if the regulations sunset and, therefore, those requirements would still apply. Without regulations, there would be less transparency and consistency for users and the regulator because the matters covered in the regulations, such as requirements for the display of betting rules, displaying results or reporting of forged tickets, would not be detailed anywhere.

The base case is scored as zero for all categories.

8.1.3 Option 1

Option 1 is to remake Part 4 of the Gambling Regulations, with minor technical amendments, which would minor typographical changes only.

Effectiveness to reduce gambling harm

The wagering and betting provisions of the Gambling Regulations are not intended to reduce gambling harm. Since the wagering and betting requirements will not impact the effectiveness of reducing gambling harm, it is scored zero.

Protects the integrity of the gaming product

Option 1 will continue to protect the integrity of wagering and betting through appropriate controls to ensure the activity is conducted appropriately and not exposed to improper or criminal exploitation.

It would ensure integrity by requiring operators to:

- ensure betting rules are displayed and/or available
- ensure appropriate management and control of betting offices
- display results and determination of dividends or prizes

¹⁰⁸ Gambling Regulations 2015 (Vic) reg 51.

¹⁰⁹ Gambling Regulations 2015 (Vic) reg 52.

¹¹⁰ Gambling Regulations 2015 (Vic) reg 53.

¹¹¹ Gambling Regulations 2015 (Vic) reg 54.

¹¹² Gambling Regulations 2015 (Vic) pt 4, div 2.



- ensure dividends are not paid until protests are decided
- provide financial statements and report significant events to the Commission
- ensure procedures are in place to terminate the acceptance of bets
- provide for particulars on tickets so the participant can check their tickets.

Option 1 will also require the publication of race fields.

The requirement to display betting rules gives people who gamble confidence the betting rules are fixed, transparent and fair. Information about the betting process provides transparency and informs players of the betting process and procedures, including in unforeseen events. Further, to ensure legitimacy and integrity, it is stipulated betting does not occur after a race starts.

The display of race results and dividends or prizes contributes to the transparency and fairness of the process for people who gamble. Ensuring money is not paid out until a race protest is resolved also ensures the protest decision is known on the dividend prior to any payment.

Ensuring appropriate management and control of betting offices provides assurance systems used for betting are not interfered with and minimises the risks of corruption.

The reporting of significant events to the Commission ensures there is independent oversight of these incidents, so the root cause can be found and addressed to prevent recurrence. A significant event includes:

- an error in the calculation of a dividend or prize
- an acceptance of a bet after an event has started
- (attempted) manipulation of software used in connection with a totalisator or approved betting competition
- misuse of information by a person employed by the operator
- the presentation of forged tickets.

Option 1 is scored as +6 for the protecting the integrity of the product criterion, as it is expected to be moderately effective at protecting the integrity of wagering and betting.

Impact on participant experience

Option 1 will impact the participant experience of wagering and betting by displaying the betting rules and displaying the results and dividends. It will improve the participant experience by ensuring people can access and understand the rules, so they can raise matters that may occur outside of the rules. The display of results and dividends fosters transparency, so people know if they are entitled to dividends and how much they can expect.

Option 1 is scored as +3 in relation to the impact of participant experience criterion, as it is expected to impact the participant experience when wagering and betting to a low level.

Cost to government and industry

Option 1 imposes an additional cost to the Commission and industry above the base case.

Option 1 requires ongoing costs for the wagering and betting operator in printing the betting rules at each cash outlet, so they can be accessed readily by participants. The department estimates



the cost of printing would be \$17,275 per annum, based on an estimate of 691 TAB outlets¹¹³ in Victoria.

The requirement to report significant events to the Commission does not impose significant costs on the wagering and betting operator as there is a streamlined notification process. The reporting may lead to an investigation that might not have otherwise been detected (or might have taken longer to detect). Any costs to the Commission to investigate the significant event will be absorbed by the Commission, which could in turn be recovered from the operator through supervision charges.¹¹⁴

The requirement to report financial statements to the Commission does not impose significant costs on the wagering and betting operator, as they deal with the timing of the provision of these reports (14 days) and the form of the report.

Option 1 is scored as -2 for the costs to government and industry criterion because the costs associated with wagering and betting provisions have a low impact on industry and government.

8.1.4 Multi-criteria assessment – Wagering and betting

Table 6: Multi-criteria assessment – Wagering and betting

Criteria	Weighting	Base case No regulation		Option 1 The existing arrangements	
		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	0	0
Protects the integrity of the product	30%	0	0	+6	+1.8
Impact on participant experience	5%	0	0	+3	+0.15
Costs to government and to industry	50%	0	0	-2	-1
Total score	100%		0		+0.95

Recommendation

Option 1 is preferred. It is recommended the Gambling Regulations, as they relate to wagering and betting, be remade with minor technical amendments.

8.2 Trade promotion lotteries

A trade promotion lottery is a lottery conducted to promote a trade or business.¹¹⁵ The lotteries require people to either buy a product or do certain things to take part in the lottery.

¹¹³ As at April 2025 (unpublished).

¹¹⁴ A supervision charge is levied on some, but not all, gambling industry participants each financial year. It is calculated by determining the total cost of regulating those gambling industry participants and subtracting the value of any fees already collected from those entities during the period.

¹¹⁵ *Gambling Regulation Act 2003* (Vic) s 1.3(1).



The conduct of trade promotion lotteries is regulated to ensure they are conducted with integrity, including fairly, and run to the standard conditions. However, a permit is not required to run trade promotion lotteries, which, in turn, means there is little data available on their operation.

8.2.1 Overview of the regulations about trade promotion lotteries

Regulating trade promotion lotteries helps to ensure integrity in the conduct of these lotteries and the experience of the participant. Currently, the regulations do not address reducing gambling harm, as there is no evidence base pointing to harms associated with this product.

A trade promotion lottery may be conducted without a permit in Victoria if the person conducting the trade promotion lottery complies with the requirements of the Act and the Regulations.¹¹⁶ Under the Act, trade promotion lotteries may only be conducted if the person conducting the lottery does not require:

- a person to have used a gaming machine or taken part in a loyalty scheme requiring the use a gaming machine or receive any gaming machine advertising from a venue operator or casino operator or a person acting on behalf of these operators, as a condition of entry¹¹⁷
- the cost involved to make an entry¹¹⁸ (ie, the phone call or SMS) to be above \$1 including GST.¹¹⁹

The prescribed conditions contained in the Gambling Regulations must also be complied with.¹²⁰

It is an offence to conduct a trade promotion lottery other than in accordance with the Act and Gambling Regulations.¹²¹

The Gambling Regulations provide additional conditions for the conduct of a trade promotion lottery.¹²² They include:

- obtaining the prior written consent for the conduct of the lottery from the person whose trade or business is to be promoted by the lottery (consent of trade or business)¹²³
- conducting the lottery primarily to benefit the trade or business being promoted¹²⁴
- ensuring all information designed to induce a person to enter the trade promotion lottery includes the lottery closing date, details on the draw and the publication of winners, and eligibility requirements¹²⁵
- publishing the names of winners of prizes worth more than \$1,000¹²⁶ and notifying the winners in writing¹²⁷

¹¹⁶ *Gambling Regulation Act 2003* (Vic) s 5.7.2.

¹¹⁷ *Gambling Regulation Act 2003* (Vic) s 5.7.2(2)(b).

¹¹⁸ *Gambling Regulation Act 2003* (Vic) s 5.7.2(2)(a).

¹¹⁹ *Determination of the expense of entry to a trade promotion lottery*, Victoria Government Gazette, No. S 12, Tuesday 9 February 2016, <https://www.gazette.vic.gov.au/gazette/Gazettes2016/GG2016S012.pdf>.

¹²⁰ *Gambling Regulation Act 2003* (Vic) s 5.7.2(1)(b).

¹²¹ *Gambling Regulation Act 2003* (Vic) s 5.7.16.

¹²² Gambling Regulations 2015 (Vic) pt 5.

¹²³ Gambling Regulations 2015 (Vic) reg 59(a).

¹²⁴ Gambling Regulations 2015 (Vic) reg 59(b).

¹²⁵ Gambling Regulations 2015 (Vic) reg 59(c).

¹²⁶ Gambling Regulations 2015 (Vic) reg 59(d).

¹²⁷ Gambling Regulations 2015 (Vic) reg 59(e).



- keeping adequate records of the finances, entries and prizes associated with the trade promotion lottery for a period of 3 years¹²⁸
- ensuring the method of the draw allows each ticket in the draw a random and equal chance of being drawn¹²⁹
- a prize winner must not be required to incur a cost to accept a prize, other than a trivial cost¹³⁰
- informing entrants of the purposes for which information collected about entrants will be used¹³¹
- ensuring a trade promotion lottery does not require a person to be present at a drawing of the lottery to win a prize, except in limited circumstances¹³²
- providing for the award of prizes within 28 days after the draw.¹³³

8.2.2 Base case

Under the base case, there would be no conditions for a person running a trade promotion lottery to comply with, as conditions would not be prescribed. Only the provisions in the Act would apply. Operators of a trade promotion lottery could provide the lottery based on their own conditions, which could increase the integrity and fairness risks associated with the product to consumers.

The base case is scored as zero for all categories.

8.2.3 Option 1

Option 1 is to remake Part 5 of the Gambling Regulations, with minor technical amendments.

The minor technical amendments clarify which provisions of the Act certain regulations relate to and clarify the prescribed condition relating to the presence of entrants.

Effectiveness to reduce gambling harm

The provisions in Option 1 will not impact reducing gambling harm and are scored as zero.

Protects the integrity of the gaming product

Option 1 will continue to protect the integrity of trade promotion lotteries through appropriate controls to ensure these lotteries are conducted appropriately.

Option 1 will ensure integrity by requiring people who provide trade promotion lotteries to:

- only run the lottery to benefit the trade or business being promoted and the trade or business has consented to the promotion
- ensure the names of winners are published and notified
- keep records for scrutiny by the Commission

¹²⁸ Gambling Regulations 2015 (Vic) reg 59(f).

¹²⁹ Gambling Regulations 2015 (Vic) reg 59(g).

¹³⁰ Gambling Regulations 2015 (Vic) reg 59(h).

¹³¹ Gambling Regulations 2015 (Vic) reg 60.

¹³² Gambling Regulations 2015 (Vic) reg 61(1).

¹³³ Gambling Regulations 2015 (Vic) reg 61(2).



- provide a method of draw that is random and equal
- only substitute a winner or prize in particular circumstances
- provide information on the number of scratch and win cards, if the lottery is conducted that way
- ensure trade promotion lotteries are not conducted in a manner offensive or contrary to public interest.

The above conditions provide the trade promotion lotteries are conducted in a fair and transparent way, to allow for regulatory oversight, and minimise the risks of illegal activities.

Option 1 is scored as +5 in relation to protecting the integrity of the product. It is expected to have moderate effect at protecting the integrity of trade promotion lotteries because of the increased capacity for scrutiny. The controls in place to support transparency and act to reduce the risk of improper or criminal exploitation, which support regulatory oversight of this product.

Impact on participant experience

The provisions relating to trade promotion lotteries will impact the experience of participants by:

- ensuring the relevant information about the closing date, draw, eligibility requirements and publication of winners is provided to participants
- providing for the award of prizes within 28 days after the draw
- not requiring a person to be present at the draw, other than in limited circumstances
- ensuring winners are not required to incur costs to collect their prize
- ensuring participants are advised on how their information will be used.

These provisions will improve participant experience by providing information to the participant so they are informed and have clarity on the rules of the lottery.

Option 1 is scored as +2 as it is expected to have a low impact on participant experience.

Cost to government and industry

Option 1 imposes an additional cost to the industry above the base case. There may be costs associated with publishing the names of winners of prizes valued above \$1,000 in a newspaper, on the internet or magazine/publication. However, these costs are expected to be minimal, as are the costs of advising a winner in writing of the prize.

There may be record keeping costs, but it is expected these costs will also be minimal.

A person conducting a trade promotion lottery may incur additional costs to provide a prize to the winner, as the regulations provide a winner must not be required to incur costs to accept a prize, meaning these costs cannot be passed onto the winner. It is expected these ancillary costs will be covered through the running of the trade promotion lottery.

Option 1 is scored as a -2 on the cost to government and industry criterion because the costs associated with the trade promotion lottery provisions have a low impact on industry and government.



8.2.4 Multi-criteria assessment – Trade promotion lotteries

Table 7: Multi-criteria assessment – Trade promotion lotteries

Criteria	Weighting	Base case No regulation		Option 1 The existing arrangements	
		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	0	0
Protects the integrity of the product	30%	0	0	+5	+1.5
Impact on participant experience	5%	0	0	+2	+0.1
Costs to government and to industry	50%	0	0	-2	-1
Total score	100%		0		+0.6

Recommendation

Option 1 is preferred. It is recommended the Gambling Regulations, as they relate to trade promotion lotteries, be remade with minor technical amendments.

8.3 Bingo

Under the Act, Bingo may be conducted by a community or charitable organisation or a licensed bingo centre operator on behalf of a community or charitable organisation.¹³⁴

Bingo may be conducted without the need to comply with the regulatory framework if it is:

- conducted by a community or charitable organisation and it is free to enter, or the gross receipts go back to participants during the session.¹³⁵
- conducted by a person other than a community or charitable organisation or a bingo centre operator and it is free to enter, or the gross receipts go back to participants and:
 - the session is not advertised or open to the public
 - is provided for the entertainment of participants and not for commercial benefit.¹³⁶

The conduct of bingo can involve substantial sums of money, with revenue reported at \$107 million in 2023-24.¹³⁷

While a relatively small proportion of Victorians participate in bingo (see Table 2), bingo is the gambling activity with the second largest proportion of high-frequency participation at 19.8 per

¹³⁴ Gambling Regulation Act 2003 (Vic) s 8.2.4(1).

¹³⁵ Gambling Regulation Act 2003 (Vic) s 8.2.4(2).

¹³⁶ Gambling Regulation Act 2003 (Vic) s 8.2.4A.

¹³⁷ Victorian Gambling and Casino Control Commission, *Keeping bingo social, safe and fair* (Discussion Paper, June 2024) 7, <https://engage.vic.gov.au/keeping-bingo-social-safe-and-fair>.



cent.¹³⁸ Participants reported the highest rate of problem gambling at 9.8 per cent¹³⁹ compared with other products and 32.5 per cent of individuals reported experiencing at least one gambling harm.¹⁴⁰

The conduct of bingo is regulated, to ensure it is conducted with integrity, including fairly, and can be regulated by the Commission.

8.3.1 Overview of the regulations about bingo

Under the Act, a community or charitable organisation must provide the Commission with notice of the intention to commence the conduct of a session of bingo.¹⁴¹ A session of bingo is a maximum of 30 games over an 8-hour period.¹⁴²

The Commission may make bingo rules for the conduct of bingo.¹⁴³ These rules set out the types and versions of bingo, prizes, admission, price of tickets, display of notice, duties of the caller and supervisor, jackpots, standards for bingo tickets and the standards for random number generators.¹⁴⁴

Bingo centres must be licenced,¹⁴⁵ and operators must keep accounting and financial records¹⁴⁶ and provide annual financial statements to the Commission.¹⁴⁷ It is a condition of an operator's licence that they implement a Responsible Gambling Code of Conduct,¹⁴⁸ which goes to matters that may assist in reducing gambling harm.

The Gambling Regulations provide for matters around the conduct of bingo.

A community or charitable organisation engaging in bingo must:

- pay the gross proceeds from a bingo session into a Commission-approved bank account in specified timeframes¹⁴⁹
- retain unsold bingo tickets for a 6-month period¹⁵⁰
- distribute an amount in prizes not less than 20 per cent of the gross receipts of the game and for bingo sessions conducted over 7 consecutive days, not less than 50 per cent and not more than 90 per cent of the total gross receipts¹⁵¹
- pay the jackpot pool at the end of the game¹⁵²

¹³⁸ A Suomi et al, above n 1, 29.

¹³⁹ A Suomi et al, above n 1, 50.

¹⁴⁰ *Ibid.*

¹⁴¹ *Gambling Regulation Act 2003* (Vic) s 8.4.2A.

¹⁴² *Gambling Regulation Act 2003* (Vic) s 8.1.2.

¹⁴³ *Gambling Regulation Act 2003* (Vic) s 8.4.2D.

¹⁴⁴ *Rules of Bingo – Notice under s 8.4.2D of the Gambling Regulation Act 2003*, Victoria Government Gazette, No. S 462, Thursday 11 November 2010, <https://www.gazette.vic.gov.au/gazette/Gazettes2010/GG2010S462.pdf>.

¹⁴⁵ *Gambling Regulation Act 2003* (Vic) s 8.5.1.

¹⁴⁶ *Gambling Regulation Act 2003* (Vic) s 8.5.37.

¹⁴⁷ *Gambling Regulation Act 2003* (Vic) s 8.5.38.

¹⁴⁸ *Gambling Regulation Act 2003* (Vic) s 8.5.7A.

¹⁴⁹ Gambling Regulations 2015 (Vic) reg 71.

¹⁵⁰ Gambling Regulations 2015 (Vic) reg 72.

¹⁵¹ Gambling Regulations 2015 (Vic) reg 73(1).

¹⁵² Gambling Regulations 2015 (Vic) reg 73(3).



- keep information for each game of bingo, including sold ticket serial numbers, the total number of bingo tickets available to be sold, the start and finish selling numbers, the number of bingo tickets sold, gross receipts, the value of prizes paid and gross profit¹⁵³
- keep information for each bingo session, including the expenses paid, the opening balance of any jackpot pool and the date from which the jackpot pool was carried forward, the closing balance of any jackpot pool and the date to which it will be carried forward and the book number of any unsold book between the lowest book number and the highest book number for the session.¹⁵⁴

Bingo sessions must be overseen by a responsible person who must ensure bingo games are only played by people at least 18 years of age, ensure running sheets are completed, pay prizes as required and perform other supervisory roles.¹⁵⁵ Running sheets must be kept and a bingo game must not start until the proportion of the running sheet relating to the previous bingo game is complete.¹⁵⁶

Bingo centres must provide information, including the applicant's name and address and proposed bingo centre address, when publishing a notice of an application for a bingo centre operator's licence.¹⁵⁷

A licence is subject to standard conditions under the Gambling Regulations, including that a bingo centre operator:

- must not conduct more than one session of bingo in the same room at the same time¹⁵⁸
- who is proposing to enter into an agreement with a community or charitable organisation to provide bingo on their behalf, must declare to the governing body of the community or charitable organisation all conflicts between the interests of the operator and the community or charitable organisation.¹⁵⁹

If a community or charitable organisation enters an agreement with a bingo centre to provide bingo on their behalf, there are limitations on the maximum amount expenses payable by the community or charitable organisation for this service.¹⁶⁰ Specifically:

- if the session is in a rolling jackpot sequence, 60 per cent of the remaining gross proceeds after deducting the jackpot pool
- in all other cases, 60 per cent of the gross proceeds of the session.¹⁶¹

8.3.2 Base case

Under the base case, bingo would only be partially regulated, with no coverage of the matters in the current regulations. This would mean matters relating to the conduct of bingo, conditions of a bingo centre operator's licence and record keeping, among other matters, would no longer be regulated.

¹⁵³ Gambling Regulations 2015 (Vic) reg 78(a).

¹⁵⁴ Gambling Regulations 2015 (Vic) reg 78(b).

¹⁵⁵ Gambling Regulations 2015 (Vic) reg 70.

¹⁵⁶ Gambling Regulations 2015 (Vic) reg 79.

¹⁵⁷ Gambling Regulations 2015 (Vic) reg 74.

¹⁵⁸ Gambling Regulations 2015 (Vic) reg 75(a).

¹⁵⁹ Gambling Regulations 2015 (Vic) reg 75.

¹⁶⁰ Gambling Regulations 2015 (Vic) reg 77.

¹⁶¹ Gambling Regulations 2015 (Vic) reg 77.



8.3.3 Option 1

Option 1 is to remake Part 6, Division 2 of the Gambling Regulations, with minor technical amendments.

The technical amendments include:

- renaming the regulation titled ‘duties of a responsible person’ to ‘supervision of session of bingo games’ to better reflect the intent of this provision
- clarifying the information to be published in an application for a bingo centre operator’s licence is a business address
- clarifying it is the responsible person or authorised person who is responsible for the running sheets.

Effectiveness to reduce gambling harm

Option 1 will have a low impact on gambling harm. It includes a requirement not to allow minors to participate in bingo games, which acts to reduce gambling harm by not permitting minors to gamble and be subject to the harms associated with bingo.

Option 1 is scored as +1 as it is expected to have a low impact on reducing gambling harm.

Protects the integrity of the gaming product

Option 1 will protect the integrity of the product through the provision of appropriate controls that ensure bingo is conducted properly and for a charitable purpose and not exposed to exploitation.

Option 1 ensures integrity through:

- providing for the conduct of bingo, so records are kept as evidence operators are complying with the regulations
- ensuring appropriate records are maintained, kept for a period and provided to the Commission so it has information available to it to regulate the industry
- providing for the functions of gaming industry employees in a bingo centre, to ensure the relevant supervision of sessions of bingo is in place.

The record keeping requirements ensure scrutiny by the Commission on the operation and financial position of bingo operators and make it more likely operators will provide accurate information.

Option 1 is scored as +4, as it is expected to be moderately effective at protecting the integrity of bingo.

Impact on participant experience

Option 1 will impact on participant experience by providing for the value of prizes distributed to participants, so the return to participants is not diminished.

Option 1 is scored as +1, as it is expected to have a low impact on the participant experience of bingo.

Cost to government and industry

Option 1 imposes an additional cost to the Commission and industry above the base case.

Bingo operators may incur costs to produce financial reports which must be provided to the Commission annually. Given this report is only required annually and includes information



normally recorded as part of business operations, these costs are expected to be minimal. The costs of these regulations have not been estimated as they are expected to be low.

Option 1 provides limits on the maximum expenses payable by a community or charitable organisation to a bingo centre operator for the conduct of each bingo session. This requirement limits the profits bingo centre operators can make by conducting bingo sessions for community and charitable organisations and acts to ensure enough profits go back to the community and charitable organisations.

Option 1 is scored as -2 because the costs associated with the bingo provisions have a low impact on industry and government.

8.3.4 Multi-criteria assessment – Bingo

Table 8: Multi-criteria assessment – Bingo

Criteria	Weighting	Base case No regulation		Option 1 The existing arrangements	
		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	+1	+0.15
Protects the integrity of the product	30%	0	0	+4	+1.2
Impact on participant experience	5%	0	0	+1	+0.05
Costs to government and to industry	50%	0	0	-2	-1
Total score	100%		0		+0.4

Recommendation

Option 1 is preferred. It is recommended the Gambling Regulations, as they relate to bingo, be remade with minor technical amendments.

8.4 Lucky envelopes

Lucky envelopes are a form of pre-determined lottery, which entitles holders to claim a prize determined and announced before the start of ticket sales.¹⁶² Lucky envelopes are also known as bingo tickets, pull-tabs or break opens.¹⁶³

In 2023-24, the Commission granted 116 applications to run a lucky envelope lottery, down from 139 the previous financial year.¹⁶⁴

As there is no evidence to suggest a risk of harm with this product, the conduct of lucky envelopes is regulated with a focus on ensuring it is conducted fairly and with integrity.

¹⁶² *Gambling Regulation Act 2003* (Vic) s 8.1.2.

¹⁶³ Victorian Gambling and Casino Control Commission, *Lucky Envelopes* (Webpage, 23 January 2025), <https://www.vgccc.vic.gov.au/for-gambling-providers/community-and-charitable-gaming/lucky-envelopes>.

¹⁶⁴ Victorian Gambling and Casino Control Commission, above n 1, 37.



8.4.1 Overview of the regulations about lucky envelopes

To sell lucky envelopes, organisations must be a community or charitable organisation¹⁶⁵ and hold a minor gaming permit (lucky envelopes).¹⁶⁶ This permit remains in force for a period not exceeding 2 years, unless cancelled or surrendered sooner.¹⁶⁷ Lucky envelopes can be sold via punchboard¹⁶⁸ or through lucky envelope vending machines.¹⁶⁹

The Act provides the sale of lucky envelopes must comply with the prescribed standards¹⁷⁰ and conditions.¹⁷¹ The Gambling Regulations provide these prescribed conditions and include that permit holders:

- must not sell lucky envelopes to persons under the age of 18 years¹⁷²
- must include their name and the permit number in a visible place where the lucky envelopes are dispensed and sold¹⁷³
- may only sell lucky envelopes with a cash prize at premises with a liquor licence, on the premises of the permit holder, at a bingo centre, a fete, fair carnival or gymkhana¹⁷⁴
- must not sell a series of lucky envelopes with a value of more than \$5,000¹⁷⁵
- may only sell a series of lucky envelopes where the value of prizes is between 50 and 75 per cent of the total value of the series¹⁷⁶
- may only sell lucky envelopes by a vending machine,¹⁷⁷ if the machine has:
 - a separate lockable coin or token tray, a visible distinctive serial number and a coin or token reject or return mechanism¹⁷⁸
 - a mechanism to prevent dispensing of lucky envelope without the insertion of coin or token.¹⁷⁹
 - the name of the permit holder, the number of the permit, number of the series and a list of prizes and winning numbers, symbols or letters¹⁸⁰
 - a random number generator or storage device that cannot be tampered with, credits cannot be accumulated, and the dispensing of lucky tickets is counted and permanently recorded, if it is an electronic lucky envelope vending machine¹⁸¹

¹⁶⁵ *Gambling Regulation Act 2003* (Vic) s 8.3.12.

¹⁶⁶ *Gambling Regulation Act 2003* (Vic) s 8.3.14.

¹⁶⁷ *Gambling Regulation Act 2003* (Vic) s 8.3.15.

¹⁶⁸ A punchboard is a device which contains a series of lucky envelopes. It is designed to dispense lucky envelopes by being punched out of the device. *Gambling Regulations 2015* (Vic) reg 5(1).

¹⁶⁹ *Gambling Regulation Act 2003* (Vic) s 8.1.2.

¹⁷⁰ *Gambling Regulation Act 2003* (Vic) s 8.4.1.

¹⁷¹ *Gambling Regulation Act 2003* (Vic) s 8.3.13(3)(a).

¹⁷² *Gambling Regulations 2015* (Vic) reg 80(1)(a).

¹⁷³ *Gambling Regulations 2015* (Vic) reg 80(1)(b).

¹⁷⁴ *Gambling Regulations 2015* (Vic) reg 80(1)(c).

¹⁷⁵ *Gambling Regulations 2015* (Vic) reg 80(1)(d).

¹⁷⁶ *Gambling Regulations 2015* (Vic) reg 80(1)(e).

¹⁷⁷ *Gambling Regulations 2015* (Vic) reg 80(1)(f).

¹⁷⁸ *Gambling Regulations 2015* (Vic) reg 80(2)(a).

¹⁷⁹ *Gambling Regulations 2015* (Vic) reg 80(2)(b).

¹⁸⁰ *Gambling Regulations 2015* (Vic) reg 80(2)(c).

¹⁸¹ *Gambling Regulations 2015* (Vic) reg 80(2)(d).

- may only install a lucky envelope vending machine on premises that hold a liquor licence, are occupied by the permit holder or at a bingo centre.¹⁸²

Minor gaming permit (lucky envelope) holders are also required to keep records for the sale of each series of lucky envelopes sold including the:

- premises where they were sold¹⁸³
- name of each person who sold the lucky envelopes, if they were not sold at a liquor licence, the premises of the permit holder or at a bingo centre¹⁸⁴
- value, gross receipts and value of the prizes paid¹⁸⁵
- amount and nature of expenses incurred and to whom they were paid¹⁸⁶
- number of lucky envelopes unsold.¹⁸⁷

The Gambling Regulations include prescribed standards for the supply of lucky envelopes. Suppliers must only supply lucky envelopes if they:

- are part of a series¹⁸⁸
- include the same predetermined price for each lucky envelope, a predetermined value of prizes and the number of winning lucky envelopes (other than those dispensed from an electronic vending machine)¹⁸⁹
- include the serial number identifying the series and the details of the supplier and permit holder (other than a lucky envelope in a punchboard¹⁹⁰
- are a punchboard, with the following information:
 - the name of the permit holder, the number of the permit;¹⁹¹ or
 - the name and contact details of the supplier, and the supplier must keep a register with the details of the permit holder for three years¹⁹²
- include:
 - symbols, numerals or letters or any combination of them; or
 - symbols, numerals or letters or any combination of them and a notification the ticket is a winning ticket; or
 - a description of a prize which the holder is entitled to claim; or
 - an indication that the lucky envelope is not a winning ticket; or

¹⁸² Gambling Regulations 2015 (Vic) reg 80(2)(e).

¹⁸³ Gambling Regulations 2015 (Vic) reg 82(a).

¹⁸⁴ Gambling Regulations 2015 (Vic) reg 82(b).

¹⁸⁵ Gambling Regulations 2015 (Vic) reg 82(c).

¹⁸⁶ Gambling Regulations 2015 (Vic) reg 82(d).

¹⁸⁷ Gambling Regulations 2015 (Vic) reg 82(e).

¹⁸⁸ Gambling Regulations 2015 (Vic) reg 81(2).

¹⁸⁹ Gambling Regulations 2015 (Vic) reg 81(3).

¹⁹⁰ Gambling Regulations 2015 (Vic) reg 81(4).

¹⁹¹ Gambling Regulations 2015 (Vic) reg 81(5).

¹⁹² Gambling Regulations 2015 (Vic) regs 81(5)(a)–81(5)(b).



- a combination of all of the above.¹⁹³
- have symbols, numerals or letters or any combination of them, displayed at the point of sale or on the punchboard, which indicates the combination of characters that entitle the holder to claim a prize and if there are different prizes, the prize that relates to each combination.¹⁹⁴

8.4.2 Base case

Under the base case, the regulations relating to lucky envelopes would sunset and not be remade. The Act requires a person must not supply lucky envelopes that do not comply with the prescribed standards¹⁹⁵ and a holder of a minor gaming permit (lucky envelopes) must not sell lucky envelopes that do not comply with the prescribed standards.¹⁹⁶ If the Gambling Regulations sunset there would cease to be any prescribed standards, making these provisions of the Act unenforceable. All other provisions relating to lucky envelopes in the Act would still apply, however critical standards around supplying lucky enveloped that are part of series, have the same prize, have details about the supplier and serial numbers would not be in place. This would leave the product vulnerable to exploitation and present fairness and integrity risks, in particular.

8.4.3 Option 1

Option 1 is to remake Part 6, Division 5 of the Gambling Regulations, with minor technical amendments. The technical amendments clarify that the address of a supplier that must be provided is their business address.

Effectiveness to reduce gambling harm

The lucky envelope provisions in Option 1 include a requirement not to sell lucky envelopes to minors. This requirement acts to reduce gaming harm by not allowing minors to gamble and be subject to the harms of gambling.

Option 1 is scored as +1 as it is expected to have a low impact on reducing gambling harm.

Protects the integrity of the gaming product

The provisions in Option 1 will protect the integrity of the lucky envelopes through the provision of appropriate controls and standards which ensures lucky envelopes are conducted properly and not exposed to improper or criminal exploitation.

The proposed regulations ensure integrity by:

- requiring lucky envelopes to be part of a series
- limiting locations for sale of lucky envelopes
- specifying a value range for lucky envelope prizes
- prescribing standards for lucky envelopes and devices for issuing tickets

The prescribed standards and conditions ensure the supply and sale of the lucky envelope is done in a way that is fair and honest, and the details of organisations involved in the provision and sale of envelopes is known. The additional requirements that lucky envelope vending

¹⁹³ Gambling Regulations 2015 (Vic) reg 81(6).

¹⁹⁴ Gambling Regulations 2015 (Vic) reg 81(7).

¹⁹⁵ *Gambling Regulation Act 2003* (Vic) s 8.4.1(1).

¹⁹⁶ *Gambling Regulation Act 2003* (Vic) s 8.4.1(2).



machines include structural components ensures integrity of the product, as the vending machines cannot be manipulated.

Option 1 includes a prescribed condition that the value of prizes available to be won in a series of lucky envelopes must be between 50-75 per cent of the notional value of the series. The purpose of this requirement is to ensure a reasonable proportion of sales are returned to the participant and to ensure a reasonable frequency of prizes.

Option 1 is scored as +4 as it is expected to be moderately effective at protecting the integrity of lucky envelopes.

Impact on participant experience

Option 1 impacts on participant experience with lucky envelopes by providing information about the lucky envelope permit holder and information on whether the lucky envelope is a winning ticket and a description of the prize the holder is entitled to claim.

Option 1 is scored +1 as it is expected to have a low level of effectiveness at impacting on participant experience.

Cost to government and industry

Option 1 imposes an additional cost to the industry above the base case.

Option 1 requires records to be kept by the holder of a lucky envelope permit holder. The costs of producing and keeping these records are expected to be minimal.

Option 1 includes a prescribed condition that the value of prizes available to be won in a series of lucky envelopes must be between 50-75 per cent of the notional value of the series. However, this provides a limit on how much money can be raised by lucky envelopes for industry compared to the base case, where there are no restrictions on value of prizes. In this way, industry revenue from lucky envelopes is restricted and is reflective of this being considered a minor gaming product.

Option 1 is scored as -2 as the cost associated with lucky envelopes has a low impact on industry above those associated with the application fee which will be discussed at Chapter 8.7 and the requirements around return to participants.

8.4.4 Multi-criteria assessment – Lucky envelopes

Table 9: Multi-criteria assessment – Lucky envelopes

Criteria	Weighting	Base case No regulation		Option 1 The existing arrangements	
		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	+1	+0.15
Protects the integrity of the product	30%	0	0	+4	+1.2
Impact on participant experience	5%	0	0	+1	+0.05
Costs to government and to industry	50%	0	0	-2	-1
Total score	100%		0		+0.4

Recommendation

Option 1 is the preferred option. It is recommended the Gambling Regulations, as they relate to lucky envelopes, be remade with minor technical amendments.

8.5 Raffles

A raffle is a lottery where people buy tickets for a chance to win prizes.¹⁹⁷ Raffles may only be conducted by a community or charitable organisation or a licensed commercial raffle organiser on behalf of a community or charitable organisation.¹⁹⁸ In 2023-24, the Commission granted 323 minor gaming permits to run a raffle.¹⁹⁹

The conduct of raffles is regulated to ensure it is conducted fairly and with integrity.

8.5.1 Overview of the regulations about raffles

The Act provides that a minor gaming permit (raffle) is not required for a raffle where the prize value is less than a certain amount (\$22,340 as at 1 July 2025, allowing for indexation).²⁰⁰ If the prize raffle value is greater than this amount, the raffle organiser must apply for a minor gaming permit (raffle) from the Commission.²⁰¹

All raffles must be conducted in accordance with the requirements of the Act²⁰² and the Gambling Regulations.²⁰³ The Gambling Regulations provide different conditions for the conduct of raffles, depending on whether a minor gaming permit (raffle) is required and the raffle is small.²⁰⁴ Conditions for conducting raffles, other than a small raffle include that the person conducting the raffle must:

- draw the raffle:
 - on the date authorised by the permit²⁰⁵ or printed on the ticket if a permit is not required²⁰⁶
 - using a method that provides each ticket a random and equal chance of being drawn²⁰⁷
 - so the first ticket drawn wins the first prize, if there is more than one prize²⁰⁸
 - so a ticket drawn is not drawn again, unless authorised by the permit²⁰⁹
 - record sufficient information to identify and locate the person who purchased the ticket²¹⁰

¹⁹⁷ *Gambling Regulation Act 2003* (Vic) s 1.3.

¹⁹⁸ *Gambling Regulation Act 2003* (Vic) s 8.2.3(c).

¹⁹⁹ Victorian Gambling and Casino Control Commission, above n 1, 37.

²⁰⁰ As at 1 July 2025 the current value for a minor gaming permit (raffle) is \$22,340. *Gambling Regulation Act 2003* (Vic) ss 8.2.3(a), s 8.2.3A.

²⁰¹ *Gambling Regulation Act 2003* (Vic) s 8.3.14.

²⁰² *Gambling Regulation Act 2003* (Vic) ch 8.

²⁰³ *Gambling Regulations 2015* (Vic) pt 6, div 6.

²⁰⁴ A small raffle is defined as a raffle conducted for the benefit of a community or charitable organisation for which a) the value of prize does not exceed \$500 and the total value of the prizes of all raffles conducted on the same day within an 8 hour period do not exceed \$1000 and b) the sale of the first ticket and the drawing of the raffle occur on the same day within an 8 hour period.

²⁰⁵ *Gambling Regulations 2015* (Vic) reg 83(1)(f).

²⁰⁶ *Gambling Regulations 2015* (Vic) reg 84(1)(d)(i).

²⁰⁷ *Gambling Regulations 2015* (Vic) regs 83(1)(g) and 84(1)(d)(ii).

²⁰⁸ *Gambling Regulations 2015* (Vic) regs 83(1)(h) and 84(1)(d)(iii).

²⁰⁹ *Gambling Regulations 2015* (Vic) regs 83(1)(i) 84(1)(d)(iv).

²¹⁰ *Gambling Regulations 2015* (Vic) regs 83(1)(b) and 84(1)(b)(iii).



- provide the following information on each raffle ticket, unless the raffle is a small raffle:
 - name of the permit holder or the community or charitable organisation benefiting from the raffle
 - raffle permit number (if there is one)
 - ticket price
 - the maximum number of tickets authorised by the raffle permit (if there is one)
 - a description of each prize and its value
 - details of the location, date and time when the raffle will be drawn and how the results will be published and winners notified of the results²¹¹
- transfer the prize to the winner within 28 days after the draw²¹²
- unless the raffle is a small raffle, publish the results of the draw in accordance with the publication information on the raffle tickets.²¹³

The Gambling Regulations provide some additional prescribed conditions for a minor gaming permit (raffle). The conditions require permit holders to:

- not exceed the number of raffle tickets authorised by the permit²¹⁴
- only sell tickets during the period authorised by the permit²¹⁵
- only sell a ticket for the one specific raffle, unless authorised by the raffle permit²¹⁶
- not offer or pay a book-buyers prize unless authorised by the raffle permit²¹⁷
- authorise persons to sell tickets in the raffle and only remunerate them in accordance with any condition imposed by the Commission under the Act²¹⁸
- if they have entered into an agreement or arrangement for another person to promote or conduct the raffle for reward, this must be disclosed on the ticket and the material advertising the raffle.²¹⁹

The Gambling Regulations also provide for additional conditions of running a raffle when a minor gaming permit is not required.²²⁰ A person running a raffle without a minor gaming permit must:

- have the written authority of the governing body of the community or charitable organisation who will benefit from the raffle²²¹
- not sell the raffle tickets for more than a 3-month period²²²

²¹¹ Gambling Regulations 2015 (Vic) regs 83(1)(e), 83(2) and 84(1)(b)(v).

²¹² Gambling Regulations 2015 (Vic) regs 83(1)(k) and 84(1)(g).

²¹³ Gambling Regulations 2015 (Vic) regs 83(1)(j) and 84(1)(e).

²¹⁴ Gambling Regulations 2015 (Vic) reg 83(1)(a).

²¹⁵ Gambling Regulations 2015 (Vic) reg 83(1)(c).

²¹⁶ Gambling Regulations 2015 (Vic) reg 83(1)(d).

²¹⁷ Gambling Regulations 2015 (Vic) reg 83(1)(l).

²¹⁸ Gambling Regulations 2015 (Vic) reg 83(1)(m).

²¹⁹ Gambling Regulations 2015 (Vic) reg 83(3).

²²⁰ Gambling Regulations 2015 (Vic) reg 84.

²²¹ Gambling Regulations 2015 (Vic) reg 84(1)(a).

²²² Gambling Regulations 2015 (Vic) reg 84(1)(b)(i).



- not sell raffle tickets with a total value of more than 6 times and not less than twice the value of all prizes²²³
- sell a raffle ticket that is for only one specified raffle²²⁴
- not offer or pay a book-buyers prize²²⁵ or remunerate a person who sells tickets²²⁶
- keep accurate records for a period of 3 years after the finalisation of the raffle²²⁷
- if they are paying a person, other than an employee, to conduct the raffle, that fact and the person's details must be printed on every ticket or on all material advertising the raffle²²⁸
- if they have entered into an agreement or arrangement for another person to promote or conduct the raffle for reward, this must be disclosed on the ticket and the material advertising the raffle.²²⁹

The Gambling Regulations provide additional conditions for small raffles, including that a person conducting a small raffle:

- may use a blank raffle book numbered on both the butt and the ticket or in the case of a raffle where the method of the draw is to be a spinning wheel, use buttless numbered tickets from a perforated ticket sheet having no more numbers than there are divisions on the wheel²³⁰
- must draw the raffle again without the winning ticket butt, if the person to whom the ticket was sold cannot be identified from the butt and no person comes forward to claim the prize within a reasonable period after the draw is loudly proclaimed²³¹
- spin the wheel again, if a small raffle is drawn through the use of a spinning wheel and no person comes forward to claim the prize within a reasonable period after the draw is loudly proclaimed.²³²

The Gambling Regulations also provide for record keeping by the permit holder,²³³ disposal of unclaimed raffle prizes²³⁴ and disclosure if the proceeds are to be paid to or for a political party.²³⁵

8.5.2 Base case

Under the base case, the regulations would sunset and not be remade. The Act would still require a minor gaming permit to conduct a raffle over the value of \$22,340, but there would be no conditions for permit holders to comply with.

²²³ Gambling Regulations 2015 (Vic) reg 84(1)(b)(ii).

²²⁴ Gambling Regulations 2015 (Vic) reg 84(1)(b)(iv).

²²⁵ Gambling Regulations 2015 (Vic) reg 84(1)(h).

²²⁶ Gambling Regulations 2015 (Vic) reg 84(1)(i).

²²⁷ Gambling Regulations 2015 (Vic) reg 84(1)(j).

²²⁸ Gambling Regulations 2015 (Vic) reg 84(2)(a).

²²⁹ Gambling Regulations 2015 (Vic) reg 84(2)(b).

²³⁰ Gambling Regulations 2015 (Vic) reg 84(1)(c).

²³¹ Gambling Regulations 2015 (Vic) reg 84(1)(f)(i).

²³² Gambling Regulations 2015 (Vic) reg 84(1)(f)(ii).

²³³ Gambling Regulations 2015 (Vic) reg 86.

²³⁴ Gambling Regulations 2015 (Vic) reg 87.

²³⁵ Gambling Regulations 2015 (Vic) reg 85.



Raffles conducted without a minor gaming permit could also still occur under the Act if the Gambling Regulations sunset, but similarly there would be no conditions to comply with.

The base case is scored as zero for all categories.

8.5.3 Option 1

Option 1 is to remake Part 6, Division 6 of the Gambling Regulations, with minor technical amendments to update a regulation heading to refer to the prize value of \$20,000 rather than \$5,000, to reflect the Act.

Effectiveness to reduce gambling harm

Option 1 will not impact gambling harm and is scored as zero.

Protects the integrity of the gaming product

Option 1 will continue to protect the integrity of raffles by requiring:

- only the authorised number of tickets can be sold over the authorised period and
- the raffle is drawn on the day authorised
- that the first ticket drawn wins the first prize if there is more than one prize
- appropriate records are maintained and kept
- information is provided to participants on the prizes and their values.

These measures provide integrity by ensuring raffles are run with clarity around the number of tickets to be sold, the ticket selling period, the date the raffle will be drawn, the prizes available and the prizes' values. Ensuring these matters are set at the start of the raffle helps to protect the integrity of the raffle.

The provision of record keeping ensures the Commission can investigate a complaint.

Option 1 provides the value of the total number of raffle tickets available for sale must not be greater than 6 times, and not less than twice, the value of all prizes. The purpose of this requirement is to ensure the sale of tickets is proportionate to the prizes offered.

Option 1 is scored as +6, as it is expected to be moderately effective at protecting the integrity of raffles.

Impact on participant experience

Option 1 will impact on the experience of participants in raffles by requiring:

- the participant to provide sufficient information, so they can be contacted if they win a prize
- publication of the results
- transfer of the prizes to the winners within 28 days of the draw
- each raffle ticket in the draw a random and equal chance of being drawn.

Option 1 impacts on the participant experience by ensuring participants are informed of relevant information about the raffle, including how they can check the results. Option 1 also ensures that prizes are transferred in a timely manner and provides certainty for each participant that each raffle ticket has an equal chance of winning and that the draws will be random.

Option 1 is scored as +1 as it is expected to be low impact at protecting the integrity of raffles.



Cost to government and industry

Option 1 imposes additional costs to industry above the base case.

There may be costs to industry due to the requirement to keep and retain records. However, it is not expected these obligations will impose a significant cost on the raffle operators.

Option 1 provides the value of the total number of raffle tickets available for sale must not be greater than 6 times, and not less than twice, the value of all prizes. However, this provides a limit on how much money can be raised by raffles for industry compared to the base case, where there are no restrictions on value of tickets available for sale. Option 1 is scored as -2 because the costs associated with the provisions relating to raffles will have a low impact on industry.

8.5.4 Multi-criteria assessment – Raffles

Table 10: Multi-criteria assessment – Raffles

Criteria	Weighting	Base case No regulation		Option 1 The existing arrangements	
		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	0	0
Protects the integrity of the product	30%	0	0	+6	+1.8
Impact on participant experience	5%	0	0	+1	+0.05
Costs to government and to industry	50%	0	0	-2	-1
Total score	100%		0		+0.85

Recommendation

Option 1 is preferred. It is recommended the Gambling Regulations, as they relate to raffles, be remade with minor technical amendments.

8.6 Commercial raffle organisers

Commercial raffle organisers may conduct raffles on behalf of a community or charitable organisation.²³⁶ As at 30 June 2025, there were 28 commercial raffle operators approved to operate in Victoria.²³⁷

Commercial raffles are regulated to ensure they are conducted with integrity, including fairly.

8.6.1 Overview of the regulations about commercial raffle organisers

A commercial raffle licence is required if a raffle is to be conducted on behalf of a community or charitable organisation.²³⁸ Under the Act, a community or charitable organisation may enter an

²³⁶ *Gambling Regulation Act 2003* (Vic) s 8.2.3(c).

²³⁷ Victorian Gambling and Casino Control Commission, above n 1, 38.

²³⁸ *Gambling Regulation Act 2003* (Vic) s 8.5A.2.



agreement with a commercial raffle licensee for the conduct of a raffle on behalf of the organisation.²³⁹

All such raffles must be conducted in accordance with the requirements of the Act²⁴⁰ and the Gambling Regulations.²⁴¹ A licence is subject to the conditions imposed by the Act and the Gambling Regulations,²⁴² including that the licensee implements a Responsible Gambling Code of Conduct.²⁴³

The Gambling Regulations detail additional conditions that require the licensee to:

- not purchase raffle tickets in a commercial raffle they are running²⁴⁴
- ensure certain persons do not purchase raffle tickets in a commercial lottery they are running²⁴⁵
- deposit raffle proceeds owing to the community or charitable organisation into their bank account every 7 days and provide a written statement detailing the number of tickets sold and the amount of money deposited when they make the deposit.²⁴⁶

The Gambling Regulations sets the maximum fee to be paid to the licensee for operating a commercial raffle as 'fair and reasonable', having regard to the activities and objectives of the community or charitable organisation and the services provided by the licensee.²⁴⁷

The Act requires an application for a commercial raffle organiser's licence to be published in a newspaper.²⁴⁸ The Gambling Regulations prescribe the information to be included in the notice.²⁴⁹

The qualifications of an auditor for a commercial raffle organiser's accounts and financial statements²⁵⁰ are detailed in the Gambling Regulations.²⁵¹

8.6.2 Base case

Under the base case, the regulations would sunset and not be remade. The Act would still provide for the licensing on commercial raffle organisers, but there would be no conditions attached to licences. As the prescribed conditions provide additional requirements on the conduct of commercial raffles, not remaking these regulations would result in the Act providing only partial regulation for the provision of commercial raffle organisers. Some important controls would cease to exist, for example, about restrictions on who can purchase tickets in a commercial raffle.

²³⁹ *Gambling Regulation Act 2003* (Vic) s 8.5A.23.

²⁴⁰ *Gambling Regulation Act 2003* (Vic) ch 8, pt 5A.

²⁴¹ Gambling Regulations 2015 (Vic) pt 6, div 7.

²⁴² *Gambling Regulation Act 2003* (Vic) s 8.5A.8(3).

²⁴³ *Gambling Regulation Act 2003* (Vic) s 8.5A.8A.

²⁴⁴ Gambling Regulations 2015 (Vic) reg 89(a).

²⁴⁵ Such persons are: their relative; a director or employee of the licensee, or their relative; or any person liable to the licensee under the Act, or their relative. See Gambling Regulations 2015 (Vic) reg 89(b).

²⁴⁶ Gambling Regulations 2015 (Vic) reg 89(c).

²⁴⁷ Gambling Regulations 2015 (Vic) reg 90.

²⁴⁸ *Gambling Regulation Act 2003* (Vic) s 8.5A.5(3).

²⁴⁹ Gambling Regulations 2015 (Vic) reg 88.

²⁵⁰ *Gambling Regulation Act 2003* (Vic) s 8.5A.26.

²⁵¹ Gambling Regulations 2015 (Vic) reg 91.



8.6.3 Option 1

Option 1 is to remake Part 6, Division 7 of the Gambling Regulations, with minor technical amendments to confirm the Registrar is the Registrar of Incorporated Associations.

Effectiveness to reduce gambling harm

The provisions in Option 1 will not impact gambling harm and are scored as zero.

Protects the integrity of the gaming product

Option 1 protects the integrity of the commercial raffle organisers by ensuring raffles are conducted with integrity on behalf of community or charitable organisations.

Option 1 ensures integrity by:

- ensuring the licensee does not purchase raffle tickets for raffles they run and takes reasonable steps to ensure neither do their relatives or their associates or their associates' relatives
- regularly depositing raffle proceedings into the organisation's bank account and providing written statements detailing the number of tickets sold and the amount deposited.

It is important for transparency that raffle tickets are not purchased by people closely connected with the organiser, as this could lead to real or perceived manipulation of the results to favour the associated person.

The requirement to regularly provide the raffle proceeds ensures money is provided promptly to the community or charitable organisation.

Option 1 is scored as +6, as it is expected to be moderately effective at protecting the integrity of the raffles conducted by commercial raffle organisers. The provisions provide appropriate checks and balances and allow the Commission to investigate complaints, ensuring the integrity of the product is not compromised.

Impact on participant experience

Option 1 will not impact the experience of participants and is scored zero.

Cost to government and industry

Option 1 imposes additional cost to the industry, above the base case. Commercial raffle organisers may incur costs in the engagement of an auditor to review their financial reports, but these costs are not considered additional to the expected costs of running the business, based on the assumption that most businesses would do this anyway.

Option 1 provides for a maximum fee that can be charged to a community and charitable organisation for the running of a commercial raffle. As an amount is not specified by the Gambling Regulations, but rather the Regulations specify that the fee must be 'fair and reasonable,' this option is expected to have limited impact.

Option 1 is scored as -2, as the costs associated with the provisions relating to the commercial raffle organisers have a low impact on industry.

8.6.4 Multi-criteria assessment – Commercial raffle organisers

Table 11: Multi-criteria assessment – Commercial raffle organisers

Criteria	Weighting	Base case No regulation	Option 1 The existing arrangements
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		Assigned score	Weighted score	Assigned score	Weighted score
Effectiveness - Reduce gambling harm	15%	0	0	0	0
Protects the integrity of the product	30%	0	0	+6	+1.8
Impact on participant experience	5%	0	0	0	0
Costs to government and to industry	50%	0	0	-2	-1
Total score	100%		0		+0.8

Recommendation

Option 1 is preferred. It is recommended the Gambling Regulations, as they relate to commercial raffles organisers, be remade with minor amendments.

8.7 Other forms of authorised gambling - Games at amusement centres, fetes, carnivals etc.

The Act authorises the offer of a prize at the following places and functions:

- an amusement, tourist or recreational centre
- a fete, fair, bazaar or carnival;
- a gymkhana.²⁵²

The Act provides that the cost of entry to win a prize at the above places and functions must not exceed \$50.²⁵³

8.7.1 Overview of the regulations about games at amusement centres, fetes, carnivals etc.

The Gambling Regulations prescribe standards and conditions which games at these places and functions must comply including:

- in the case of a device or game, the device or game:
 - must not be a game approved under section 60 of the Casino Control Act or a gaming machine within the meaning of the Act.²⁵⁴
 - Is such that they prize(s) available to be won at a particular attempt are clearly and unambiguously identified to participants.²⁵⁵
- in the case of a device or game that is a spinning wheel:
 - the wheel is divided into equal divisions

²⁵² *Gambling Regulation Act 2003* (Vic) s 2.2.3.

²⁵³ *Gambling Regulation Act 2003* (Vic) s 2.2.3(3).

²⁵⁴ *Gambling Regulations 2015* (Vic) reg 6(1)(a).

²⁵⁵ *Gambling Regulations 2015* (Vic) reg 6(1)(b).



- the design of the wheel allows an equal and random chance of finishing in or on a particular division
- the wheel is maintained so it operates as designed
- the number of tickets sold in each spin is equal to the number of divisions of the wheel.²⁵⁶
- in the case of a device of game that is not a spinning wheel:
 - there is no systemic bias to a particular outcome in the rules or design
 - winning a prize is an achievable outcome
 - reasonable steps are taken to explain to participants, in a language likely to be understood by them, how the game is played or the device is operated (including to the extent skills are relevant)
 - the game is played in the manner explained and the device is maintained so it operates as designed.²⁵⁷

As the provisions related to authorised gambling are largely to ensure fairness in these games, the cost burden on the relevant providers is minimal. As such, these provisions have not been subject to a multi-criteria assessment.

Recommendation

It is recommended the Gambling Regulations, as they relate to these forms of authorised gambling be remade.

9. Options and assessment – Fees

9.1 Options

Chapter 8.7 considers 3 options for fees associated with applications and permits:

- **Base case:** The regulations sunset and are not remade
- **Option 1:** Fees are set in line with current levels
- **Option 2:** Fees are aligned with new regulatory costs.

Charging application fees is necessary to recover the costs of determining and processing applications under the Act, consistent with the Victorian Government's policy (see Section 4.4).

9.1.1 Base case: No regulations

The base case involves a scenario where the Gambling Regulations sunset and the Commission is unable to collect fees from gambling industry participants.

While fee revenue would no longer be available to the state under the base case, a proportion of the costs of the Commission undertaking applications and other approvals under the Act would still be collected from gambling industry participants required to pay a supervision charge under the Act.

²⁵⁶ Gambling Regulations 2015 (Vic) reg 6(1)(c).

²⁵⁷ Gambling Regulations 2015 (Vic) reg 6(1)(d).



A supervision charge is levied on some, but not all, gambling industry participants each financial year. It is calculated by determining the total cost of regulating those gambling industry participants and subtracting the value of any fees already collected from those entities during the period.

The base case would eliminate a key funding source for the regulation of the gambling industry. Costs of important regulatory functions performed by the Commission, such as the administration of applications, would need to be met by government and, ultimately, cost taxpayers.

9.1.2 Option 1: Fees are set in line with current levels

Under Option 1, the proposed Regulations would remake the fees at their current monetary value. Table 12 below shows the proposed fees under this option.

Table 12: Fees set consistent with current levels

Application type	Fee unit	\$ value ²⁵⁸
Approval of premises for gaming	876.48	\$14,733.63
Modification of gaming machine area	8.48	\$142.55
Venue operator’s licence (VOL)	154.59	\$2,598.66
VOL – Approval of nominee of the licensee	10.37	\$174.32
VOL – Renewal	85.43	\$1,436.08
VOL – condition amendment - approved venue	20.13	\$338.39
VOL – condition amendment - increase number of gaming machines where a private inquiry is undertaken under the Act	88.14	\$1,481.63
VOL – condition amendment - increase number of gaming machines in an approved venue in all other circumstances	876.48	\$14,733.63
VOL – condition amendment - variation of approved areas	8.48	\$142.55
Application for listing on Roll	203.97	\$3,428.74
Approve gaming machine type	26.93	\$452.69
Approve gaming machine game	12.05	\$202.56
Variation to a gaming machine type or game	10.79	\$181.38
Amendment of geographic area or venue condition of a gaming machine entitlement	3.41	\$57.32
Gaming machine entitlement transfers	11.24	\$188.94
Forfeited gaming machine entitlements that are allocated again	13.39	\$225.09
Minor gaming permit	1.74	\$29.25
Amendment of conditions of minor gaming permit	1.06	\$17.82
Bingo centre operator’s licence	154.59	\$2,598.66
Renewal of bingo centre operator’s licence	85.43	\$1,436.08
Commercial raffle organiser licence	154.59	\$2,598.66
Renewal of commercial raffle organiser’s licence	85.43	\$1,436.08

²⁵⁸ One fee unit as at 1 July 2025 = \$16.81.



Application type	Fee unit	\$ value ²⁵⁸
Sports Controlling Body application	211.78	\$3,560.02
Calcutta sweepstakes	3.71	\$62.37
Gaming industry employee’s licence (GIE)	5.16	\$86.74
GIE – Replacement identification	N/A ²⁵⁹	\$10.72
GIE – Licence renewal	3.40	\$57.15
GIE licence – Application by casino special employee	3.39	\$56.99
Application for approval or a new associate – Natural person	7.10	\$119.35
Application for approval of a new associated – Entity	36.96	\$621.30

9.1.3 Option 2: Fees are aligned with new regulatory costs

The sunset of the Gambling Regulations provides an opportunity to update application fees to better reflect the true costs of the Commission’s regulatory and operational duties.

Option 2 proposes new fee units for each application type that account for these true costs. Under this option, the proposed fees are calculated based on:

- the direct costs of the Commission’s staff involved in considering and approving each application type, using the average time expended by each Victorian Public Service (VPS) grade on each application (see Appendix C for detailed costings)
- a 21.86% indirect charge for oncosts, such as superannuation and WorkCover
- a 23.20% indirect cost charge for overheads, such as accommodation costs, and enabling functions, such as finance, legal and commission costs.

Direct staffing costs

In 2022, the Commission developed an enhanced risk-based framework to guide its operations and regulatory approach that reflects its expanded legislative remit as a stand-alone gambling regulator.²⁶⁰ When processing licences and applications, staff now assess the risk of harm related to each application more comprehensively than it previously did, in line with the Commission’s enhanced harm understanding.

The greater scrutiny applied to applications and approvals has required action and oversight by more senior staff than when the previous pricing structure was set. Where applications and approvals were assessed by VPS2 and VPS3 staff in 2015, these are now being undertaken by VPS4 and VPS5 staff. In addition, delegations have also changed, with VPS4s and above able to approve various high-risk products and the Director having final approval. Increased salary costs and time spent on each licence and application have contributed to a general increase in regulatory costs related to processing applications.

Combining and removing some fees

Under Option 2, two existing application types are proposed to be combined. These are the applications related to increasing the number of gaming machines permitted in a gaming venue.

²⁵⁹ Set as a \$ value.

²⁶⁰ *Casino and Liquor Legislation Amendment Act 2022 (Vic)*.



The current Regulations have separate fees for applications where a private inquiry is undertaken under the Act and in all other circumstances.

Previously, these distinctions significantly impacted the amount of time it took the regulator to process the application. However, this is no longer the case, with the regulator now taking the same amount of time to review the application regardless of private inquiry status.

As the head of power for this application does not distinguish between the types of inquiry and there is no longer a cost differential, it is appropriate to set only one fee for this application.

It is also proposed for two fees to not be remade. These relate to venue operators making applications for 24-hour trading for electronic gaming machines (EGM). In 2024, the Act was amended to prohibit 24-hour trading, and as such, the heads of power for these applications no longer exist and the fees are redundant. The specific applications are:

- Venue operator license (VOL) – variation of the days or dates on which 24-hour gaming is permitted
- VOL – addition of condition specifying days or dates on which 24-hour gaming is permitted.

Table 13: Option 2: Fees are aligned with new regulatory costs

Application type	Fee unit	\$ value ²⁶¹
Approval of premises for gaming	638.00	\$10,724.85
Modification of gaming machine area	16.50	\$277.32
VOL	183.72	\$3,088.36
VOL – Approval of nominee of the licensee	17.60	\$295.91
VOL – Renewal	87.08	\$1,463.82
VOL – condition amendment - approved venue	54.51	\$916.32
VOL – condition amendment - increase number of gaming machines	638.00	\$10,724.85
VOL – condition amendment - variation of approved areas	14.58	\$245.17
Application for listing on Roll	183.72	\$3,088.36
Approve gaming machine type	59.40	\$998.51
Approve a gaming machine game	59.40	\$998.51
Variation to a gaming machine type	20.48	\$344.21
Variation to a gaming machine game	20.48	\$344.21
Amendment of geographic area or venue condition of a gaming machine entitlement	23.72	\$398.67
Gaming machine entitlement transfers	17.10	\$287.41
Forfeited gaming machine entitlements that are allocated again	17.10	\$287.41
Minor gaming permit	2.32	\$39.00
Amendment of conditions of minor gaming permit	2.32	\$39.00
Bingo centre operator’s licence	183.72	\$3,088.36
Renewal of bingo centre operator’s licence	87.08	\$1,463.82
Commercial raffle organiser licence	183.72	\$3,088.36
Renewal of commercial raffle organiser’s licence	87.08	\$1,463.82

²⁶¹ One fee unit as at 1 July 2025 = \$16.81.



Application type	Fee unit	\$ value ²⁶¹
Sports Controlling Body application	246.73	\$4,147.55
Calcutta sweepstakes	4.78	\$80.36
GIE	3.28	\$55.07
GIE – Replacement identification	1.91	\$32.15
GIE – Licence renewal	3.28	\$55.07
GIE – application by casino special employee	3.28	\$55.07
Application for approval or a new associate – Natural person	16.42	\$276.08
Application for approval of a new associated – Entity	92.23	\$1,550.46

The median fee increase under Option 2 is 33 per cent.

9.2 Assessment criteria

Each option is considered against 3 assessment criteria, which were chosen as they align to the relevant pricing principles that underpin the Pricing for Value Guide.

9.2.1 Reflective of cost and risk

The first criterion, reflective of cost and risk, has the highest weighting because while the gambling regulation has a cost, it is required to mitigate the risk that can be posed by gambling products. Full cost recovery is preferred²⁶² to ensure general taxation revenue is not oversubscribed and can be directed toward services that present broad benefits to the community. Further, regulatory cost should be borne by gambling industry participants who benefit by offering gambling products.²⁶³

This criterion is weighted at 45 per cent.

9.2.2 Horizontal equity

Horizontal equity, the second criterion, is also weighted heavily to recognise the importance of setting fair fee levels, where applicants are charged equally for the same service.²⁶⁴ Vertical equity, involving the consideration of accessibility and an applicant’s capacity to pay, is less relevant to the analysis than horizontal equity because industry participants are commercial businesses that derive revenue from offering gambling.

This criterion is weighted at 35 per cent.

9.2.3 Simplicity

Simplicity, the third criterion, has the lowest weighting of the criteria used to assess the options. While important, the simplicity of fee structures is on balance not considered as relevant to the assessment of options as the requirement to recover regulatory costs for applications.²⁶⁵

This criterion is weighted at 20 per cent.

²⁶² Victorian Government [Pricing for Value Guide](#), pricing principle 1 – agencies should aim to recover the full costs of service provision to promote efficient consumption.

²⁶³ Pricing for Value Guide, pricing principle 2 – the cost of service provision should be borne by those who benefit from the service.

²⁶⁴ Pricing for Value Guide, pricing principle 9 – pricing should ensure sustainable usage of public services and reflect the value of natural resources.

²⁶⁵ Pricing for Value Guide, pricing principle 11 – pricing structures should be easy to understand and simple to administer.



9.3 Approach to assessment

Each proposal was scored against the assessment criteria using a scale of -10 to +10 compared to the base case, which is scored zero. Benefits are assigned positive scores and costs are assigned negative scores relative to the base case.

Scores are assigned as follows:

- 1 to 3 – low impact
- 4 to 6 – moderate impact
- 7 to 10 – high impact.

These scores are multiplied by the weight of the criterion to provide an overall score that results in a ranking of the options below, to arrive at the preferred option.

9.4 Assessment – Fees

9.4.1 Base case

Under the base case, the power to charge fees would remain in the Act, but as there would be no regulations the Commission would be unable to collect them.

The base case is scored as zero for all categories.

9.4.2 Option 1

Option 1 proposes to remake the current fee structure as is, maintaining the status quo.

Under this option, the total net industry impact against the base case (where no fees are charged) is estimated to be \$195,212.18. While the total revenue collected from industry under Option 1 is \$639,898.41, a large proportion of this figure (\$444,686,23) would be collected from gambling industry participants regardless under supervision charge provisions in the Act.

Table 14 shows the revenue from industry, calculated according to regulation costs, and the net industry impact. The net industry impact column represents the cost of regulating gambling industry participants not required to pay a supervision charge. Where appropriate, the table groups application types with similar characteristics, such as containing similar types of variations.

Table 14: Annual impact of fees under Option 1 against base case

Application type	Revenue from industry	Net industry impact
Operator licences <ul style="list-style-type: none"> • VOL and renewal • Bingo centre operator’s licence and renewal • Commercial raffle organiser’s licence and renewal 	\$66,251.64	\$17,014.31
GIE licences <ul style="list-style-type: none"> • GIE licence • GIE – Replacement identification • GIE – Licence renewal • GIE licence – Application by casino special employee 	\$221,523.83	\$0
Approvals of venues and additional gaming machines	\$72,476.65	\$0



Application type	Revenue from industry	Net industry impact
<ul style="list-style-type: none"> Approval of premises for gaming Modification of gaming area 		
Evaluation of gaming machine types and games <ul style="list-style-type: none"> Approve gaming machine type or game Variation to a gaming machine type or game 	\$147,562.55	\$147,562.55
VOL variations <ul style="list-style-type: none"> VOL – condition amendment - increase number of gaming machines where a private inquiry is undertaken under the Act VOL – condition amendment - increase number of gaming machines in an approved venue in all other circumstances 	\$16,215.26	\$0
Other VOL variations <ul style="list-style-type: none"> VOL – Approval of nominee of the licensee VOL – condition amendment - approved venue VOL – condition amendment - variation of approved areas Amendment of geographic area or venue condition of a gaming machine entitlement Gaming machine entitlement transfers Forfeited gaming machine entitlements are allocated again 	\$38,153.86	\$0
Listing on the Roll	\$3,428.74	\$3,428.74
Community and charitable gaming <ul style="list-style-type: none"> Minor gaming permit Amendment of conditions of minor gaming permit 	\$18,228.43	\$18,228.43
New associates <ul style="list-style-type: none"> Application for approval of a new associate – Natural person Application for approval of a new associate – Corporate entity 	\$52,310.37	\$5,231.04
Sports Controlling Body	\$3,560.02	\$3,560.02
Calcutta sweepstakes	\$187.10	\$187.10
Total	\$639,898.42	\$195,212.18

Reflective of costs and risk

This option is an improvement on the base case by promoting efficient consumption of the Commission’s services. Prescribing fees would signal to gambling industry participants that these services have a cost and aims to encourage consumers to consider whether specific applications or approvals are necessary.

This option is also an improvement on the base case as it ensures regulatory costs are partially recovered by fees. This would result in government (and taxpayers) subsidising only part of the Commission’s work, as opposed to the shortfall of regulatory costs following the levying of supervision charges on some gambling industry participants (under the base case). The partial reliance on government funding means Option 1 is not completely reflective of cost and risk.



Option 1 is scored as +4, as it is moderately impactful as the proposed fees only partially reflect the regulatory costs of determining and processing applications. As highlighted above, the true cost of regulation has increased since 2015 when the fee structure under Option 1 was developed, due to advancements in research, improper industry behaviour and regulatory and policy changes. This score was calculated by determining the proportion of the revenue from industry under this option against the true cost of regulation, which has been identified under Option 2.

Horizontal equity

This option is considered more equitable than the base case. Prescribing fees in the proposed Regulations will ensure all gambling industry participants pay the same fee for the same service.

The base case presents an uneven playing field for industry participants as those subject to a supervision charge pay for regulatory costs, while those who are not are at a commercial advantage.

Option 1 is scored as +5 because it is expected to have a moderate impact on the fairness of application fees between industry participants.

Simplicity

This option is considered more complex than the base case, given that any fee structure is more complicated than no fee structure under the base case.

The fee structure proposed by Option 1 would see fees set as fee units in Regulations. This approach is simple compared to other potential fee structures (not considered as part of this RIS), for example, if fees depended on or fluctuated with industry revenue.

Option 1 is scored as -1 because it is expected to have a low impact on the simplicity and predictability of application fee levels.

9.4.3 Option 2

Option 2 is to remake the fee structure with updated fee units. This approach to setting application fees is equitable, simple and provides the most transparent way of recovering the costs of application services to each category of applicant.

Under this option, the total net industry impact against the base case (where no fees are charged) is estimated to be \$519,467.70. While the total revenue collected from industry under option 2 is \$989,281.13, a large proportion of this figure (\$469,813.43) would be collected from gambling industry participants regardless under supervision charge provisions.

Table 15 below illustrates the effect of the proposed fees under Option 2 on gambling industry participants. As with Table 14 above, this table groups applications by similar processes.

Table 15: Annual impact of fees under Option 2 against base case

Application type	Revenue from industry	Net industry impact
Operator licences <ul style="list-style-type: none"> • VOL and renewal • Bingo centre operator’s licence and renewal • Commercial raffle organiser’s licence and renewal 	\$73,684.50	\$19,540.50
GIE licences	\$149,714.89	\$0.00



Application type	Revenue from industry	Net industry impact
<ul style="list-style-type: none"> GIE licence GIE – Replacement identification GIE – Licence renewal GIE licence – Application by casino special employee 		
Approvals of venues and additional gaming machines <ul style="list-style-type: none"> Approval of premises for gaming Modification of gaming area 	\$69,244.80	\$0.00
Evaluation of gaming machine types and games <ul style="list-style-type: none"> Approve gaming machine type or game Variation to a gaming machine type or game 	\$452,205.62	\$452,205.62
VOL variations <ul style="list-style-type: none"> VOL – condition amendment - increase number of gaming machines where a private inquiry is undertaken under the Act VOL – condition amendment - increase number of gaming machines in an approved venue in all other circumstances 	\$21,449.70	\$0.00
Other VOL variations <ul style="list-style-type: none"> VOL – Approval of nominee of the licensee VOL – condition amendment - approved venue VOL – condition amendment - variation of approved areas Amendment of geographic area or venue condition of a gaming machine entitlement Gaming machine entitlement transfers Forfeited gaming machine entitlements are allocated again 	\$64,725.86	\$0.00
Listing on the Roll	\$3,088.36	\$3,088.36
Community and charitable gaming <ul style="list-style-type: none"> Minor gaming permit Amendment of conditions of minor gaming permit 	\$27,963.00	\$27,963.00
New associates <ul style="list-style-type: none"> Application for approval of a new associate – natural person Application for approval of a new associate – corporate entity 	\$122,815.76	\$12,281.58
Sports Controlling Body	\$4,147.55	\$4,147.55
Calcutta sweepstakes	\$241.09	\$241.09
Total	\$989,281.13	\$519,467.70



Reflective of costs and risk

This option provides the greatest improvement on the base case, both from an efficiency and cost recovery perspective. Under this option, fee levels are proposed to be set to account for changes to processes, delegations and staff salaries since 2015, as set out in Section 9.1.3 above. These changes reflect the risk-based approach to regulation now taken by the Commission.

Under this option, the proposed fee structure would be accurately prescribed to recover the full cost of the regulatory activity. This creates alignment and a more transparent relationship between fees charged and costs incurred in the processing of applications and other approvals. It also aligns with the *Pricing for Value Guide*'s principle that those who receive the benefit of a service incur the full cost of the service, in contrast to the base case.

Option 2 is scored as +9 because it would be highly impactful with fees more accurately reflecting the regulatory costs involved in determining and processing applications.

Horizontal equity

This option provides the same horizontal equity benefits as for Option 1 above. Prescribing fees provides horizontal equity among industry participants that would otherwise pay differing regulatory costs under the base case.

Option 2 is scored as +5 because it is expected to have a moderate impact on the fairness of application fees between gambling industry participants.

Simplicity

This option is more complex than the base case, noting that any fee structure is more complicated than no fee structure that would exist under the base case.

The fee structure for this option would see fees set as fee units in Regulations. This approach is simple compared to other potential fee structures (not considered as part of this RIS), for example, if fees depended on industry revenue.

Option 2 makes some improvements to the existing fee structure (i.e. Option 1) by combining fees that no longer need to be split (see section 9.1.3).

Options 2 is scored as -1 because it is expected to have a low cost on the simplicity and predictability of application fee levels.

9.4.4 Multi-criteria assessment – Fees

Table 16: Multi-criteria assessment - Fees

Criteria	Weighting	Base case No regulation		Option 1 Remake fees with no changes		Option 2 Remake fees with updated figures	
		Assigned score	Weighted score	Assigned score	Weighted score	Assigned score	Weighted score
Reflective of cost and risk	45%	0	0	+4	+1.8	+9	+4.05
Horizontal equity	35%	0	0	+5	+1.75	+5	+1.75
Simplicity	20%	0	0	-1	+0.2	-1	-0.2
Total score	100%		0		+3.35		+5.6



Recommendation

Option 2 is preferred. It is recommended the proposed Regulations, as they relate to fees, be remade to recover the true regulatory costs of determining and processing applications.

10. Summary of preferred options

This chapter summarises the preferred options based on the analysis presented in the previous chapters.

10.1 Remaking the requirements for EGMs and other gambling types

The preferred option (Option 1) is to remake the Gambling Regulations with minor technical amendments where necessary.

Option 1 would remake the current provisions relating to prescribed connections and training requirements which have been rewritten for clarity.

Option 1 would also clarify the requirements relating to signage outside gaming venues.

Option 1 would remove provisions that are no longer required due to amendments to the Act, references to the Victorian Responsible Gambling Foundation and transitional provisions that are no longer required. For example, the current Regulations provided for how gaming machines were to be retrofitted with a device attached to it, if they could not display the time on the video screen, when the requirement to display the time of day on each machine was introduced. As gaming machines are now all able to display the time of day on the video screen, the provisions for retrofitting them with a device attached to the gaming machine is no longer required and has been omitted. Gaming machines will still be required to display the time of day on the video screen.

Table 17 summarises the multi-criteria assessment scores for Option 1. The weighting of these scores is outlined at Chapter 6.

Table 17: Multi-criteria assessment scores for Option 1

Type of gambling	Criterion	Weighting	Base case No Regulation	Option 1 The existing arrangements
Gaming machines – physical environment	Effectiveness - Reduce gambling harm	15%	0	+0.9
	Protects the integrity of the product	30%	0	0
	Impact on participant experience	5%	0	+0.15
	Costs to government and to industry	50%	0	-1
	Total score			0



Type of gambling	Criterion	Weighting	Base case No Regulation	Option 1 The existing arrangements
Gaming machines – Availability of information	Effectiveness - Reduce gambling harm	15%	0	+0.45
	Protects the integrity of the product	30%	0	0
	Impact on participant experience	5%	0	+0.1
	Costs to government and to industry	50%	0	-0.25
	Total score		0	+0.3
Gaming machines – Advertising and signage	Effectiveness - Reduce gambling harm	15%	0	-0.15
	Protects the integrity of the product	30%	0	0
	Impact on participant experience	5%	0	+0.15
	Costs to government and to industry	50%	0	+2.5
	Total score		0	+2.5
Wagering and betting	Effectiveness - Reduce gambling harm	15%	0	0
	Protects the integrity of the product	30%	0	+1.8
	Impact on participant experience	5%	0	+0.15
	Costs to government and to industry	50%	0	-1
	Total score		0	+0.95
Trade promotion lotteries	Effectiveness - Reduce gambling harm	15%	0	0



Type of gambling	Criterion	Weighting	Base case No Regulation	Option 1 The existing arrangements
	Protects the integrity of the product	30%	0	+1.5
	Impact on participant experience	5%	0	+0.1
	Costs to government and to industry	50%	0	-1
	Total score		0	+0.6
Bingo	Effectiveness - Reduce gambling harm	15%	0	+0.15
	Protects the integrity of the product	30%	0	+1.2
	Impact on participant experience	5%	0	+0.05
	Costs to government and to industry	50%	0	-1
	Total score		0	+0.4
Lucky envelopes	Effectiveness - Reduce gambling harm	15%	0	+0.15
	Protects the integrity of the product	30%	0	+1.2
	Impact on participant experience	5%	0	+0.05
	Costs to government and to industry	50%	0	-1
	Total score		0	+0.4
Raffles	Effectiveness - Reduce gambling harm	15%	0	0
	Protects the integrity of the product	30%	0	+1.8
	Impact on participant experience	5%	0	+0.05

Type of gambling	Criterion	Weighting	Base case No Regulation	Option 1 The existing arrangements
	Costs to government and to industry	50%	0	-1
	Total score		0	+0.85
Commercial raffle organisers	Effectiveness - Reduce gambling harm	15%	0	0
	Protects the integrity of the product	30%	0	+1.8
	Impact on participant experience	5%	0	0
	Costs to government and to industry	50%	0	-1
	Total score		0	+0.8

The results of the multi-criteria assessment show Option 1 is scored positively compared to the base case.

10.2 Remaking the fee requirements

The preferred option (Option 2) is to remake the fee structure to align with the new regulator costs. Option 2 has a median fee increase of 33 per cent which has been driven by significant changes to the gambling landscape over the last decade.

Increased costs of regulation have been driven by:

- gambling harm being treated as a public health issue
- questionable, and at times illegal, behaviour of gambling industry participants; and
- regulatory and policy change stemming from the above two factors.

The results of the multi-criteria assessment, shown above at section 9.4.4 Table 16, demonstrate that Option 2 is the preferred option for setting the fee structure as it has the highest weighted score of the two options considered.

A comparison of the proposed fees under this Option 2 against the current fees, including the percentage increase, is included in Table 20.

11. Competition and small business impacts

The Gambling Regulations apply to a wide range of providers offering different gambling products, from large to small businesses that include community and charity organisations, as well as sporting, community and RSL clubs.



This section analyses the impact of the proposed Regulations on small businesses, and more broadly on competition within the industry.

The impact of the proposed Regulations on competition and small businesses are assessed in Table 18.

Table 18: Competition and small business assessment

Competition impact	Answer	Explanation
<p>Are the proposed Regulations likely to limit the number of gambling providers to:</p> <ul style="list-style-type: none"> only one provider? only one buyer? less than four providers? 	No	<p>The proposed Regulations are not expected to limit the number of gambling providers beyond what is already imposed by the Act itself.</p> <p>The increase in fees is unlikely to have a significant impact on the supply of gambling services, as it will be expected that gambling providers will absorb the additional costs. It is also noted most of the applications are not mandatory (that is, the gambling provider voluntarily makes the application as needed, depending on their circumstances).</p>
<p>Would the proposed measures restrict the ability of gambling providers to choose their output, price or service quality?</p>	Yes	<p>Where the proposed Regulations impose restrictions on gambling providers, any restrictions apply to all providers equally to preserve the integrity of the product and to safeguard consumers.</p> <p>The proposed Regulations require gambling providers to:</p> <ul style="list-style-type: none"> comply with lighting standards provide prizes to a certain value for lucky envelopes and raffles. <p>However, gambling providers still can choose other elements of their output, price and service quality around these restrictions.</p> <p>The proposed Regulations require staff to be trained in responsible service of gaming to help staff identify and respond to gambling harm.</p> <p>These restrictions are necessary to achieve the intent of the proposed Regulations.</p>
<p>Would the proposed Regulations discourage entry into the industry by new gambling providers or encourage existing providers to exit the industry?</p>	No	<p>The proposed Regulations are not expected to discourage entry into or encourage exit from the industry beyond what is already imposed by the Act itself. The increased fees are not expected to discourage entry or encourage exit, as the fees are a small proportion of the revenue gambling providers derive, and the total fees paid by the providers who are subject to the supervision charge will not change.</p>
<p>Would the proposed Regulations impose higher costs on a particular class of business or type of service? (e.g. small business)</p>	No	<p>The proposed Regulations impose costs on industry equally. By setting fees in the proposed Regulations, it ensures that gambling providers are covering the costs of application services. Without fees, the supervision charge would be the only mechanism to cost recover. The supervision charge is not levied on all gambling providers.</p>



<p>Are the proposed measures likely to make it more difficult for consumers to move between or leave service providers?</p>	<p>No</p>	<p>The proposed Regulations do not impose any measures that will impact a consumer’s ability to choose between gambling providers.</p>
<p>Would the proposed Regulations affect the ability of gambling providers to innovate, adopt new technology or respond to the changing demand of patrons?</p>	<p>Yes</p>	<p>The proposed Regulations may limit innovation in relation to gambling products due to the need to ensure gambling products have appropriate levels of integrity and harm protection. The restriction is necessary to achieve the intent of the proposed Regulations.</p>

The proposed Regulations will apply to a wide range of providers offering different gambling products, from large to small businesses that include community and charity organisations, as well as sporting, community and RSL clubs.

The proposed Regulations will impose a small impact on small businesses. The Act itself imposes a higher impact on small businesses than the proposed Regulations. The proposed Regulations limit the amount of profit a business can receive, rather than directly imposing costs on the small business. This impact is necessary to achieve the intent of the proposed Regulations. Businesses have shown they are able to comply with the Gambling Regulations and keep operating. Given this, it is anticipated there will be no issues with small businesses complying with the proposed Regulations.

In relation to fees, the preferred Option 2 will have a minimal cost impact on gambling industry participants. Gambling industry participants are commercial businesses that derive revenue from offering gambling products. It is anticipated that the updated fee structure will be a small proportion of the revenue gambling industry participants derive. In addition, the fees with the largest per centage increases are for applications from gambling industry participants, such as venue operators, who are already subject to a supervision charge. As a consequence, there is no net impact on these businesses given the supervision charge is calculated by subtracting any fee revenue already collected.

12. Implementation and evaluation

12.1 Implementation

This RIS concludes that the Gambling Regulations should be remade with minor changes, aligned to government policy settings. The Gambling Regulations will be made in June 2026. Transitional arrangements are not necessary as policy settings have remained the same.

The department will engage with stakeholders from industry, government and community representatives to make them aware of the RIS and encourage their feedback. The outcomes of the RIS process and the making of the regulations will also be communicated through a range of existing stakeholder forums and online.

The Commission will be responsible for compliance with, and enforcement of, the proposed Regulations. Its role includes providing information and guidance to the entities and people it regulates about their obligations under the Act, the Casino Control Act and the Racing Act. This includes clearly communicating about fee changes.

12.2 Evaluation

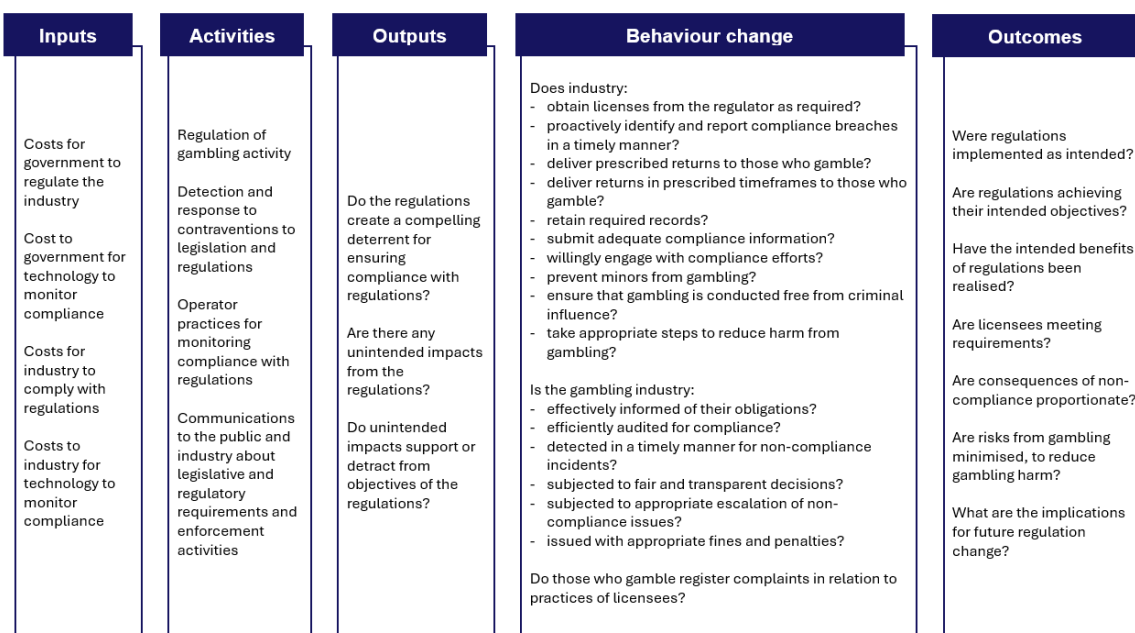
An evaluation of the proposed Regulations will be completed before they sunset to inform future regulation. Evidence for the evaluation will primarily rely upon data and information obtained by the Commission, in addition to consultation with other stakeholders.

12.2.1 What will be evaluated?

Figure 4 details what the regulations seek to achieve in terms of behaviour and outcomes. This will be refined and confirmed when the new Gambling Regulations 2026 are made.

The evaluation methodology will be based upon the program logic, to ensure measurement of outcomes and contextual information is reflective of regulation intent.

Figure 4: Evaluation methodology program logic



12.2.2 How will the evaluation be undertaken?

A range of key data and information will be sought for the evaluation, including reported government and industry costs of administering the regulations, Commission reports and documentation, gambling statistics and key secondary sources. Consultation will also occur with the Commission and other key stakeholders and the broader environment (for example, changes in gambling preferences) will also be considered.

The data and information will be collected via collation forms and informed by the program logic (see Figure 4). The scope will ultimately be contingent on available budget, timeframes and information.

The evaluation may consider the following:

- costs to government and costs reported by industry associated with administering the regulations
- outcomes of Commission inspections, audits and investigations into operators to assess whether gambling is conducted safely and in accordance with gambling legislation and regulations



- gambling statistics such as venue revenues and player losses and other secondary sources such as the *Victorian population gambling and health survey* to identify and contextualise practices that may cause gambling harm
- consultation with key stakeholders, including the Commission.

12.2.3 Who will carry out the evaluation?

The department will complete the evaluation and, if required, may appoint an external supplier to complete some components. The Commission will provide key information on compliance, implementation barriers and unintended consequences and context via consultation.

12.2.4 When will the evaluation be done

The evaluation process will begin prior to implementation of the regulations. The evaluation plan will be developed before implementation, including confirming the program logic and preparation of collation forms that capture evaluation data and information.

Some information and data will be sourced from compliance and audit reports. The data and information captured by these reports will be assessed around 6 months after the regulations start to ensure data and information are fit for purpose and to enable rectification if necessary.

A final evaluation will enable a review of the regulations before they sunset in 2036. This review will assess whether the regulations have achieved their intended objectives and will inform future changes to the regulations.



Appendix A – Glossary of acronyms and terms

Acronym/term	Definition
Act	<i>Gambling Regulation Act 2003 (Vic)</i>
AUSTRAC	Commonwealth agency responsible for preventing, detecting and responding to criminal abuse of the financial system to protect the community from serious and organised crime.
Bingo	Bingo is a form of community and charitable gaming where participants receive tickets with randomly numbered squares. Participants mark off the numbers as they are randomly drawn and announced. A participant wins if he or she is the first to mark off all the numbers on their ticket and call “bingo”. Bingo may be conducted by a community or charitable organisation for fundraising purposes or by a bingo centre operator, licensed by the Commission, which conducts bingo sessions on behalf of community or charitable organisations. As at 9 January 2025, there were 6 licensed bingo centre operators in Victoria, operating 7 bingo centres.
Bookmaker	A person or a company that accepts bets from the public usually on racing, sporting or other approved events.
Cashless gaming	Gambling without notes or coins on land-based products like gaming machines.
Calcutta Sweepstakes	A Calcutta sweepstake is a competition that involves a sweep or draw for competitors in a particular race or event followed by an auction. Participants may choose between selling the race competitor or retaining the competitor. Prizes are distributed to participants who hold the successful competitors in the race. Calcutta sweepstakes are often conducted by clubs during the Melbourne Cup.
Clubs	Clubs are organisations established for community purposes. A club needs to hold a club liquor licence or a racing club licence, or provide other evidence, to show it has been established for community purposes.
Commission	The Victorian Gambling and Casino Control Commission, established under the <i>Victorian Gambling and Casino Control Commission Act 2011 (Vic)</i> , is the independent regulator of Victoria’s gambling industry.
Community Support Fund (CSF)	A trust fund established under the Act that directs a portion of gaming revenue back to the community. The CSF receives 8.33 per cent of revenue generated from gaming machines in hotels. Funding from the CSF can be allocated to a range of initiatives, including research into gambling harm and harm minimisation, drug and alcohol treatment and education programs, financial counselling, sport and recreation and the arts.
Crown	Crown Resorts Limited, the ultimate holding company of Crown Melbourne Limited, the casino operator in Victoria.



EGM or EGMs	A type of gambling product, also referred to as gaming machines and pokies. See gaming machines.
Fee unit	The <i>Monetary Units Act 2004 (Vic)</i> prescribes ‘fee units’ in regulations so dollar amounts do not need to be updated annually. The value of a fee unit is updated annually. The value of a fee unit for 2025-26 is set at \$16.81.
Gaming industry employee’s licence (GIE)	A licence required to work with EGMs.
Gaming machines	Gaming machines, commonly known as “pokies”, are machines that generate random outcomes when a button is pushed which may or may not return a cash prize. Gaming machines are owned and operated under licences by venue operators in the Casino, clubs and hotels.
Hospitals and Charities Fund	A trust fund established under the <i>Health Services Act 1988 (Vic)</i> that directs a portion of gambling revenue back to health care.
Gaming machine entitlement	Club and hotel venue operators must hold gaming machine entitlements to operate gaming machines in Victoria. These entitlements must attach to a venue approved by the Commission, and operators must have an entitlement for each machine.
Keno	Keno is a rapid draw lottery game where the outcome is determined by a random number generator that draws a set of numbers from a larger set of numbers. It is provided in clubs, hotels and wagering outlets, as well as online. After participants choose a set of numbers, the winning numbers are generated randomly and electronically and posted on screens. Keno (VIC) Pty Ltd and Lottoland Australia Pty Ltd are licensed to conduct Keno in Victoria.
Loyalty schemes	A reward program at gaming venues.
Lucky envelope	A lucky envelope is a form of lottery in which the tickets that entitle the holders to claim a prize have been determined before the commencement of the lottery. Community or charitable organisations may sell lucky envelopes to raise funds. Lucky envelopes may be sold by hand or from a vending machine.
Mental Health Fund	A trust fund established under the Act that directs a portion of gambling revenue back into mental health and wellbeing and disability care.
Player card	A card that stores information and can be used to apply a time limit or net loss limit to the use of gaming machines. The card may also be capable of being used to track the use of gaming machines for the purposes of a loyalty scheme. A player card can be registered to a person or used anonymously as a casual card.
Pokies	A type of gambling product, also referred to as electronic gaming machines, EGMs or gaming machines. See gaming machines.
Pre-commitment	A system that allows users of gaming machines to set time or money limits and to track their play.



<p>Problem Gambling Severity Index (PGSI)</p>	<p>A screening tool measures at-risk gambling behaviour in the preceding 12-month period, and classifies people who gamble into categories. The higher the score, the more at risk a person is of ‘problem gambling’.</p> <p>Non-problem gambling (PGSI 0) (NPG) - People who vary in the frequency with which they gamble and the amount of time and money they spend, but who experience no negative consequences.</p> <p>At low risk of ‘problem gambling’ (PGSI 1–2) (LR) - People who experience minor negative consequences, such as very occasionally spending over their limit or feeling guilty about gambling.</p> <p>At moderate risk of ‘problem gambling’ (PGSI 3–7) (MR) - People who sometimes experience negative consequences from their gambling, such as spending more than they can afford, losing track of time or feeling guilty about gambling.</p> <p>‘Problem gambling’ (PGSI 8+). (PG) - People who are likely to gamble heavily and may have lost control. They experience severe negative consequences from their gambling.</p>
<p>Proposed Regulations</p>	<p>Gambling Regulations 2026</p>
<p>Public lotteries</p>	<p>A lottery is a game or scheme where prizes are drawn or won by a process that is dependent on chance. Public lotteries include games such as Tattsлото, Oz Lotto and Powerball as well as scratch tickets. Tattersall’s Sweeps Pty Ltd (The Lottery Corporation) is the holder of the Public Lottery Licence in Victoria.</p>
<p>Raffle</p>	<p>A raffle is a lottery in which people participate by purchasing a ticket and where prizes are assigned by the drawing of lots or by any other method of chance. Raffles may be conducted by community or charitable organisations or by commercial raffle organisers on behalf of a community or charitable organisation.</p>
<p>Royal Commission into the Casino Operator and Licence (RCCOL)</p>	<p>A Royal Commission under the <i>Inquiries Act 2014</i> (Vic).</p>
<p>Scratch tickets (Scratch)</p>	<p>An instant form of lottery usually in the form of a card where one or more areas have concealed information which can be revealed by scratching off the covering to reveal whether or not a prize is won.</p>
<p>Sports and other betting</p>	<p>Sports betting is betting on an outcome in a sporting event such as football, netball or golf. Sports betting providers may offer betting on an approved event with the agreement of the relevant sports controlling body.</p> <p>Other events such as elections (State, Federal, American and United Kingdom) and the American Academy Awards may also be approved as betting events.</p>
<p>Table Games (Traditional)</p>	<p>Table games involving cards or dice which are offered at the casino. Popular casino table games are Blackjack, roulette, baccarat, craps and poker.</p>



Table Games (Automated)	<p>Table games, offered at the casino, where bets are placed on a terminal rather than at a table. Popular automated table games include blackjack, roulette and baccarat.</p> <p>There are two forms of automated table games - a Semi Automated Table Game (SATG) which involves players betting on a terminal on a live outcome, and a Fully Automated Table Game (FATG) which involves players betting on a terminal on an automated or virtual outcome.</p>
TAB outlet	A venue where wagering and betting occurs, in Victoria under the wagering and betting licence.
Trade Promotion Lottery (TPL)	A trade promotion lottery (TPL) is a lottery conducted for the purpose of promoting a trade or business. This includes schemes that include an element of chance that give away prizes by any means, including barrel draws, spinning wheel, scratch and win tickets and 1900 telephone calls.
Wagering	Wagering is the placing of a wager or bet on a thoroughbred, harness or greyhound race (race events). Wagering service providers offer betting on race events and include the wagering and betting licensee, Tabcorp Wagering (VIC) Pty Ltd (Tabcorp), Victorian bookmakers and bookmakers licensed in other states and territories.
Wagering Service Providers (WSP)	The wagering and betting licensee, approved Victorian bookmakers and approved online wagering and sports betting providers.
YourPlay	The pre-commitment scheme available on all gaming machines in Victoria.
Venue Operators Licence (VOL)	This licence is required in order to operate EGMs in Victoria.
Victorian racing industry	The Victorian racing industry consists of 3 racing codes: thoroughbred, harness and greyhound racing.



Appendix B – Victorian Acts and Regulations that govern gambling

Acts

Casino Control Act: Establishes a system for the licensing, supervision and control of casinos, with the aims of ensuring the management and operation of casinos remains free from criminal influence or exploitation, ensuring gaming in casinos is conducted honestly, and promoting tourism, employment, and economic development generally in the state.

Gambling Regulation Act: Consolidates the law for various gambling forms. It covers licencing of gaming at venues and seeks to minimise harm caused by gambling. It aims to ensure gambling is conducted honestly and is free from criminal influence and exploitation.

Racing Act: Establishes 3 racing controlling bodies: Racing Victoria Limited, Harness Racing Victoria and Greyhound Racing Victoria. It provides the 3 racing controlling bodies with the authority to licence Victorian oncourse bookmakers.

Regulations

Casino Control Regulations 2023: Provide for matters relating to the corporate governance of the casino operator and requirements and specifications for player cards, player activity statements, pre-commitment limit setting, non-cash gaming tokens in a casino, identity verification and exclusion orders from the casino.

Casino Control (Fees) Regulations 2015: Prescribe fees for applications under the Casino Control Act.

Gambling Regulations: Provide for matters regarding gaming machines, wagering and betting, trade promotion lotteries, community and charitable gaming and prescribed fees, offences and penalties related to gambling.

Gambling Regulation (Pre-commitment and Loyalty Scheme) Regulations 2025: Prescribe matters in relation to pre-commitment, player cards, player account equipment, the conduct of loyalty schemes and the provision of information relating to pre-commitment and loyalty schemes.



Appendix C – Option 2 detailed costings

Overall impacts

Table 19 summarises the estimated total revenue to be collected from gambling industry participants applying for licences and other approvals.

This is calculated by multiplying the proposed fee by the forecast number of applications. The table uses 2025-26 dollar values.

Table 19: Overall impacts

Application type	Proposed fee level	No. per year	Total fees
Approval of premises for gaming	\$10,724.85	4	\$42,899.40
Modification of gaming machine area	\$277.32	95	\$26,345.40
Venue operator's licence (VOL)	\$3,088.36	9	\$27,795.24
VOL – approval of nominee of the licensee	\$295.91	93	\$27,519.63
VOL – renewal	\$1,463.82	18	\$26,348.76
VOL – condition amendment - approved venue	\$916.32	11	\$10,079.52
VOL – condition amendment - increase number of gaming machines	\$10,724.85	2	\$10,724.85
VOL – condition amendment - variation of approved areas	\$245.17	20	\$4,903.40
Application for listing on Roll	\$3,088.36	1	\$3,088.36
Approve gaming machine type	\$998.51	6	\$5,991.06
Approve gaming machine game	\$998.51	279	\$278,584.29
Variation to a gaming machine type	\$344.21	243.5	\$83,815.14
Variation to a gaming machine game	\$344.21	243.5	\$83,815.14
Amendment of geographic area or venue condition of a gaming machine entitlement	\$398.67	6	\$2,392.02
Gaming machine entitlement transfers	\$287.41	14	\$4,023.74
Forfeited gaming machine entitlements that are allocated again	\$287.41	55	\$15,807.55
Minor gaming permit	\$39.00	477	\$18,603.00
Amendment of conditions of minor gaming permit	\$39.00	240	\$9,360.00
Bingo centre operator's licence	\$3,088.36	2	\$6,176.72
Renewal of bingo centre operator's licence	\$1,463.82	1	\$1,463.82
Commercial raffle organiser licence	\$3,088.36	3	\$9,265.08
Renewal of commercial raffle organiser's licence	\$1,463.82	1.8	\$2,634.88
Sports Controlling Body application	\$4,147.55	1	\$4,147.55
Calcutta sweepstakes	\$80.36	3	\$241.09
Gaming industry employee's licence (GIE)	\$55.07	2,310	\$127,211.70
GIE – replacement identification	\$32.15	97	\$3,118.55
GIE – licence renewal	\$55.07	336	\$18,503.52
GIE – application by casino special employee	\$55.07	16	\$881.12
Application for approval for a new associate – Natural person	\$276.08	355	\$98,008.40
Application for approval of a new associated – Entity	\$1,550.46	16	\$24,807.36
Total annual fees (2025-26 values)			\$989,281.13



Single year impact

The total fees estimated to be paid per year under the Proposed Regulations are \$989,281.13 in 2025-26 values. The precise value of total fees will increase each year as the value of fee units is increased to reflect inflationary changes.

10-year impact

The estimated impact of the proposed fees over the 10-year life of the Proposed Regulations is estimated to be \$8.0 million in net present value terms.²⁶⁶

²⁶⁶ Net present value is calculated using a 4 per cent discount rate.



Comparison of proposed fees against current fees

Table 20: Comparison of proposed fees against current fees

	Act head of power	Gambling Regulations 2015	Exiting fee units	Existing fee ²⁶⁷	Proposed fee unit	Proposed fee ²⁶⁸	Change (%)
Approval of premises for gaming	3.3.4(2)	95	876.48	\$14,733.63	638.00	\$10,724.85	-27%
Modification of gaming machine area	3.3.16(2)	96	8.48	\$142.55	16.50	\$277.32	95%
VOL	3.4.8(2)(b)	97	154.59	\$2,598.66	183.72	\$3,088.36	19%
VOL – Approval of nominee of the licensee	3.4.14(3A)(b)	98	10.37	\$174.32	17.60	\$295.91	70%
VOL – Renewal	3.4.16(2)	99	85.43	\$1,436.08	87.08	\$1,463.82	2%
VOL – condition amendment - approved venue	3.4.17(1)(a) 3.4.18(1)(b)	100(a)	20.13	\$338.39	54.51	\$916.32	171%
VOL – condition amendment - increase number of gaming machines permitted in an approved venue where a private inquiry is undertaken under the Act ²⁶⁹	3.4.17(1)(b) 3.4.18(1)(b)	100(b)(i)	88.14	\$1,481.63	638.00	\$10,724.85	624%
VOL – condition amendment - increase number of gaming machines in all other circumstances	3.4.17(1)(b) 3.4.18(1)(b)	100(b)(ii)	876.48	\$14,733.63	638.00	\$10,724.85	-27%
VOL – condition amendment - variation of approved areas	3.4.17(1)(c)	100(c)	8.48	\$142.55	14.58	\$245.17	72%
Application for listing on Roll	3.4.61(2)(a)	101	203.97	\$3,428.74	183.72	\$3,088.36	-10%
Approve gaming machine type	3.5.4(1)	102(a)	26.93	\$452.69	59.40	\$998.51	121%
Approve gaming machine game	3.5.4(1)	102(b)	12.05	\$202.56	59.40	\$998.51	393%
Variation to a gaming machine type or game	3.5.5(3B)(b)	103(a)	10.79	\$181.38	20.48	\$344.21	90%
Variation to a gaming machine game	3.5.5(3B)(b)	103(b)	10.79	\$181.38	20.48	\$344.21	90%
Amendment of geographic area or venue condition of a gaming machine entitlement	3.4A.12(2)(b)	104	3.41	\$57.32	23.72	\$398.67	595%
Gaming machine entitlement transfers	3.4A.15(1)	105	11.24	\$188.94	17.10	\$287.41	52%
Forfeited gaming machine entitlements that are allocated again	3.4A.33(2)	106	13.39	\$225.09	17.10	\$287.41	28%
Minor gaming permit	8.3.12(2)(e)	107	1.74	\$29.25	2.32	\$39.00	33%

²⁶⁷ One fee unit as at 1 July 2025 = \$16.81.

²⁶⁸ One fee unit as at 1 July 2025 = \$16.81.

²⁶⁹ This application and the one below will be remade as one, as the distinction between 'private inquiry' and 'all other circumstances' no longer applies.



	Act head of power	Gambling Regulations 2015	Exiting fee units	Existing fee ²⁶⁷	Proposed fee unit	Proposed fee ²⁶⁸	Change (%)
Amendment of conditions of minor gaming permit	8.3.17(2)(a)(iii)	108	1.06	\$17.82	2.32	\$39.00	119%
Bingo centre operator's licence	8.5.3(1)(b)	109	154.59	\$2,598.66	183.72	\$3,088.36	19%
Renewal of a bingo centre operator's licence	8.5.11(2)	110	85.43	\$1,436.08	87.08	\$1,463.82	2%
Commercial raffle organiser licence	8.5A.5(2)(b)	111	154.59	\$2,598.66	183.72	\$3,088.36	19%
Renewal of commercial raffle organiser's licence	8.5A.12(2)	112	85.43	\$1,436.08	87.08	\$1,463.82	2%
Sports Controlling Body application	4.5.12(2)(c)	113	211.78	\$3,560.02	246.73	\$4,147.55	17%
Calcutta sweepstakes	2.2.6(3)	114	3.71	\$62.37	4.78	\$80.36	29%
GIE	9A.1.4(3)(a)	115	5.16	\$86.74	3.28	\$55.07	-37%
GIE – Replacement identification	9A.1.8(4)(b)	116	N/A ²⁷⁰	\$10.72	1.91	\$32.15	200%
GIE – Licence renewal	9A.1.11(2)	117	3.40	\$57.15	3.28	\$55.07	-4%
GIE – application by casino special employee	9A.1.21(2)(a)	118	3.39	\$56.99	3.28	\$55.07	-3%
Application for approval of a new associate – Natural person	10.4A.7(2A)(b)	119(a)	7.10	\$119.35	16.42	\$276.08	131%
Application for approval of a new associate – Corporate entity	10.4A.7(2A)(b)	119(b)	36.96	\$621.30	92.23	\$1,550.46	150%

²⁷⁰ Set as a \$ value.



Costing approach

The process used to determine the costs for each Commission function is the ‘fully distributed cost’ method, the most comprehensive costing approach. It calculates the direct and indirect costs to perform each function. Direct costs include salaries and operating expenses of staff involved in determining and processing licences and applications. Indirect costs include oncosts, overheads and enabling functions of the Commission. This method is considered appropriate because the fees apply to a significant proportion of the Commission’s activities.

These costs have been informed by consultation with the Commission to:

- identify officers involved in applications by VPS classification and hourly rate
- identify the time to determine and process each application by those officers
- determine the indirect costs related to the application process, including Commissioner costs.

The cost for each function was calculated as the number of minutes of staff time multiplied by the staff costs for the relevant officer level, taking account of oncosts, corporate overheads and enabling functions costs. Some costs may be more than others due to the nature of the application, requiring follow-up information or requiring cross-agency verification.

Calculations for each proposed fee are summarised in the tables below.

Detailed fee descriptions

The following sections describe the specific fees in detail. The fees are discussed in groups of related matters and include:

- a description of the nature of the fee
- the staff time required to undertake the relevant process for each fee
- revenue from industry of each fee group
- net industry impact of each fee group.

The application types have been grouped in various ways and include groups involving similar application processes, the type of applicant applying for each licence and whether the licence is for initial approval or variation. Table 20

Operator licences

The Act requires that a person or organisation must have a licence to be:

- a gaming machine venue operator
- a bingo centre operator
- a commercial raffle organiser.

A similar process is required for each of these licence applications and associated licence renewals. This is because the approval process for each licence type involves a similar set of integrity checks.

Licence application

The licence application process includes:

- lodgement and receipt of the licence application



- publication of a notice in the newspaper by the applicant
- in many cases, request of additional information from the applicant
- receipt and consideration of objections
- consideration of matters relating to the application
- notification of approval or rejection to the applicant.

The Commission considers several factors in determining an application. These include:

- whether the applicant is of good repute
- the financial position and background of the applicant.

Table 21: Cost of venue operators, bingo centre operators and commercial raffle operator’s licences

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	1,440	\$76.75	\$1,841.94
VPS Grade 5	660	\$91.68	\$1,008.46
VPS Grade 6	120	\$118.98	\$237.96
Total	2,340		\$3,088.36

Licence renewal

Table 22: Cost of venue operators, bingo centre operators and commercial raffle operator’s licence renewals

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	600	\$76.75	\$767.47
VPS Grade 5	300	\$91.68	\$458.39
VPS Grade 6	120	\$118.98	\$237.96
Total	2,340		\$1,463.82

GIE licences

People who perform certain functions with gaming machines are required to have GIE licences. Table 23 to Table 26 summarise the times and costs to process these applications:

- GIE licence
- GIE licence renewal
- GIE replacement identification
- GIE licence for a person already licenced as a casino special employee.

The consideration of a GIE licence application or GIE licence renewal involves an assessment of the material provided by the applicant and verification of the information where necessary. The applicant must provide a National Police Certificate, a credit report, a passport-style photograph and a credit card for the application fee. The Commission also engages in internal processing, record keeping and notification processes as part of this process.



In assessing an application, the Commission assesses the:

- integrity, responsibility, personal background and financial stability of the applicant
- applicant’s general reputation regarding character, honesty and integrity
- applicant’s suitability to perform the type of work proposed as a licensee.

Table 23: Cost for gaming industry employee’s licence

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 3	30	\$64.31	\$32.15
VPS Grade 5	15	\$91.68	\$22.92
Total	45		\$55.07

Table 24: Cost for gaming industry employee’s licence renewal

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 3	30	\$64.31	\$32.15
VPS Grade 5	15	\$91.68	\$22.92
Total	45		\$55.07

Table 25: Cost for gaming industry employee replacement identification

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 3	30	\$64.31	\$32.15
Total	30		\$32.15

Table 26: Cost for gaming industry employee’s licence application from a casino special employee

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 3	30	\$64.31	\$32.15
VPS Grade 5	15	\$91.68	\$22.92
Total	45		\$55.07

Approval of venue for gaming machines

A venue operator must have a VOL and an approved premises to conduct gaming. Once the Commission has approved the premises, the venue operator licensee is responsible for all gaming activity at the venue.

Applicants must attach required plans (1:100 scale sit plan of the premises and 1:50 scale plan of the proposed gaming machine area), evidence of planning, social and economic impact assessment report and any other relevant documentation when applying for premises approval. These attachments are then considered by the Commission in granting approvals.



Table 27: Costs for gaming machine premises approval

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	4,620	\$76.75	\$5,909.56
VPS Grade 5	1,020	\$91.68	\$1,558.53
VPS Grade 6	920	\$118.98	\$1,824.38
Strategic Advisor	180	\$118.98	\$356.94
Deputy Director	240	\$146.52	\$586.10
Director	180	\$163.11	\$489.34
Total	7,160		\$10,724.85

Table 28: Modification of gaming machine area

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 3	30	\$64.31	\$32.15
VPS Grade 4	120	\$76.75	\$153.49
VPS Grade 5	60	\$91.68	\$91.68
Total	420		\$277.32

Licence variations

An application to the Commission must be made to amend a VOL to vary the number of gaming machines permitted to operate at an approved premises. Applicants must attach required plans, evidence of planning, social and economic impact assessment report and any other relevant documentation when applying for premises approval. These attachments are then considered by the Commission in granting approvals.

Table 29: Increase number of gaming machines permitted in approved venue

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	4,620	\$76.75	\$5,909.56
VPS Grade 5	1,020	\$91.68	\$1,558.53
VPS Grade 6	920	\$118.98	\$1,824.38
Strategic Advisor	180	\$118.98	\$356.94
Deputy Director	240	\$146.52	\$586.10
Director	180	\$163.11	\$489.34
Total	7,160		\$10,724.85

Gaming machines

The Commission sets standards for gaming machines and approves gaming machine types and games for use in gaming venues.



A person or organisation can apply to the Commission for a gaming machine type or game to be evaluated for approval. This application is made by manufacturers of gaming machine types and games that must seek Commission approval before any gaming machine type or game can be made operational for public use.

A variation of gaming machine type or game would be sought by a manufacturer when making a change to a gaming machine type or game. This would most likely be needed when the manufacturer needs to fix a fault in the gaming machine type or game.

Approval of a gaming machine type or game

The process for the approval of a gaming machine type and gaming machine game has increased in complexity since 2015 due to the Commission's adoption of a risk-based regulatory approach and prioritisation of its evolved understanding of harm. The increase in complexity has contributed to driving the increase in the application fees. The process involves a thorough assessment of the gaming machine type and game's technical compliance with standards, in particular the Australian/New Zealand Gaming Machine National Standard.

Table 30: Approval of gaming machine type or game

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	540	\$76.75	\$690.73
VPS Grade 5	120	\$91.68	\$183.36
VPS Grade 6	60	\$118.98	\$118.98
Director	2	\$163.11	\$5.44
Total	722		\$998.51

Variations to approved machines and games

The processes for gaming machine types and game variations are similar and mainly involves checking the proposed variations are align with national standards and preparing an application report.

Table 31: Variation to gaming machine type or game

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	210	\$76.75	\$268.62
VPS Grade 5	30	\$91.68	\$45.84
VPS Grade 6	15	\$118.98	\$29.75
Total	255		\$344.21

Other venue operator licence variations

The Commission performs several additional regulatory functions for venue operators for which fees are prescribed.



Venue operators’ nominees

Where a licensed venue operator is a body corporate, it must nominate a natural person to be its nominee to be responsible for each venue. Once appointed, the nominee is responsible for the venue on behalf of the venue operator. This ensures that the person is responsible for the management and control of the gaming venue and liable under the Act as a gaming venue operator.

The Commission requires several documents from an applicant, including their passport photo, National Police Check, Individual Credit Report and Historical Personal Name Extract. The process for approving a venue operator’s nominee involves checking the person is of good repute.

Table 32: Approval of nominee

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	180	\$76.75	\$230.24
VPS Grade 5	30	\$91.68	\$45.84
VPS Grade 6	10	\$118.98	\$19.83
Total	255		\$295.91

Adding an additional premises to a licence

A venue operator must apply to the Commission before being able to add additional premises to their licence. In practice, this generally means the licensee has purchased another licensee’s business. This fee applies where the premises has been previously approved as a gaming venue.

The process includes checking the application is consistent with the Act’s requirements and undertaking a financial assessment to check the funding arrangements for the transfer of business ownership to the applicant.

Table 33: VOL – Amendment to add approved premises

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	480	\$76.75	\$613.98
VPS Grade 5	120	\$91.68	\$183.36
VPS Grade 6	60	\$118.98	\$118.98
Total	840		\$916.32

Variation or modifications to gaming machine areas

The Commission needs to approve the variation or modification of a gaming machine area under the Act. It considers the size, layout and facilities of the approved venue and any other matter it considers relevant in assessing these applications.



Table 34: VOL – Variation to approved gaming area

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	120	\$76.75	\$153.49
VPS Grade 5	60	\$91.68	\$91.68
Total	540		\$245.17

Table 35: Modification of gaming machine area

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 3	30	\$64.31	\$32.15
VPS Grade 4	120	\$76.75	\$153.49
VPS Grade 5	60	\$91.68	\$91.68
Total	420		\$277.32

Amendments to location or venue condition

Each gaming machine entitlement is approved to be operated in a particular venue and geographic area. A venue operator may apply to the Commission to vary the geographic area or venue.

The processes involved in amending the location or venue condition of a VOL have increased in complexity with the implementation of the new risk-based approach by the Commission. The size of the increase is significant but reflects the actual cost of the scope of the work required to undertake this work, and the complexity of considerations required when making assessments that have the potential to skew or alter the operation of the gaming machine entitlements framework.

Table 36: Amendment to geographic area condition or venue condition for gaming machine entitlement

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	240	\$76.75	\$306.99
VPS Grade 5	60	\$91.68	\$91.68
Total	1,350		\$398.67

Transfer of gaming machine entitlements

The Act allows a venue operator to sell or transfer a gaming machine entitlement to another venue operator. Venue operators can apply to the Commission to transfer ownership of entitlements via the Commission Online Services Portal. The Commission must approve the transfer, having satisfied itself that the transfer rules have been met.

The transfer rules require, among other things, that:

- the transferee holds a VOL
- any amounts owing to the state for gaming machine entitlements have been paid
- any applicable geographic area and venue conditions are satisfied.



The Commission hosts the Entitlement Transfer Market (ETM) process, which allows venue operator licensees to advertise, monitor, request the transfer of entitlements, or request amendments to entitlement conditions. The application is ultimately determined by the Minister via the department, despite the Commission administering the transfer application.

Table 37: Transfer of gaming machine entitlement

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	60	\$76.75	\$76.75
VPS Grade 5	60	\$91.68	\$91.68
VPS Grade 6	60	\$118.98	\$118.98
Total	180		\$287.41

Resale of forfeited entitlements

Under certain circumstances, gaming machine entitlements may be forfeited to the state. This may occur if entitlements are not used in the specified period and the Commission has not approved an extension. This may also occur if a venue operator fails to make payments to the state for the entitlements.

Table 38: Resale of forfeited gaming machine entitlements

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	60	\$76.75	\$76.75
VPS Grade 5	60	\$91.68	\$91.68
VPS Grade 6	60	\$118.98	\$118.98
Total	180		\$287.41

The Roll of Manufacturers, Suppliers and Testers

The Roll of Manufacturers, Suppliers and Testers (Roll) lists entities approved to manufacture, supply and provide testing services of gambling equipment and systems in Victoria. Entities that wish to be listed on the Roll must apply to the Commission. The processes involved in applying for and approving an application to be listed on the Roll are similar to those for VOLs.

Table 39: Application for listing on the Roll

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	1,440	\$76.75	\$1,841.94
VPS Grade 5	660	\$91.68	\$1,008.46
VPS Grade 6	120	\$118.98	\$237.96
Total	2,340		\$3,088.36



Community and charitable gaming

Community or charitable organisations must hold a minor gaming permit before they can conduct a raffle where the prize value is \$20,000 or more, sell lucky envelopes, host a fundraising event or run a bingo session to raise funds.

Amendments to minor gaming permits can be made if the applicant needs to change conditions such as the prizes, date of ticket sales, location, date or time of the draw. The applicant must submit a form for the Commission to approve the amendment/s.

The process involved in minor gaming permits and amendments to minor gaming permits are relatively simple administrative processes. It includes checking that the applicant is a community or charitable organisation and that the person nominated to be responsible for the conduct of the activity is of good repute.

Table 40: Minor gaming permit

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 3	15	\$64.31	\$16.08
VPS Grade 5	15	\$91.68	\$22.92
Total	30		\$39.00

Table 41: Amendment of minor gaming permit

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 3	15	\$64.31	\$16.08
VPS Grade 5	15	\$91.68	\$22.92
Total	30		\$39.00

Associates

An entity that is a gambling industry participant must get the Commission’s approval for a person to become an associate of the entity. An industry participant includes entities licensed to conduct a form of gambling or that are listed on the Roll.

Under the Act, an associate includes a person who holds a financial interest in the entity, is in a position to exercise a relevant power on behalf of the entity, is able to exercise any significant influence over the management of the entity or is or will be an executive officer in the gambling business.

When considering whether to approve an associate, the Commission must consider whether the proposed associate is of good repute, whether they have a stable financial background and whether they are associated with any other persons or bodies that are not of good repute.

The process of approving associates is significantly more complex where the proposed associate is a corporate entity because the approval process involves examining information about the corporation and its directors and any closely connected companies. Therefore, fees for natural persons and corporate entities are significantly different.

Applications made by natural persons requires the Commission to analyse the applicant’s National Police Check, Individual Credit Report and Historical Personal Name Extract. The requirements for a corporate entity are more extensive with applicants being required to provide:



- Associated Individual and Entity forms
- historical organisational extract
- accountant or auditor’s statement, or summary of financial information
- business credit file
- authorisation by an associated entity
- trust deed.

Table 42: Application for approval of new associate – Natural person

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	180	\$76.75	\$230.24
VPS Grade 5	30	\$91.68	\$45.84
Total	240		\$276.08

Table 43: Application for approval for new associate – Corporate entity

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	600	\$76.75	\$767.47
VPS Grade 5	120	\$91.68	\$183.36
VPS Grade 6	60	\$118.98	\$118.98
Director	30	\$163.11	\$81.56
Total	1,122		\$1,151.37

Sports Controlling Body

An organisation may apply to the Commission for approval as the Sports Controlling Body for a sports betting event. A sports betting provider may only conduct betting on a sports event if it has entered into a Product Fee and Integrity Agreement (PFIA) with the relevant body or if the Commission has determined that the sports betting provider may conduct betting on the event.

The purpose of this arrangement is to enable sports controlling bodies to benefit from betting on events they control and ban high-risk betting markets.

A current list of approved sports controlling bodies can be found on the Commission [website](#).

Applications for approval as sports controlling bodies are not frequent.

In considering a Sports Controlling Body application, the Commission must consider the body’s:

- control, organisation and management of the event
- policies to support the integrity of the event
- commitment to following international conventions on integrity in their sport
- resources to manage the integrity system
- rules on sharing information with the betting market



- transparency about event results, appeals and protests
- collaboration with wagering service providers about suspicious betting and trends.

Table 44: Sports Controlling Body application fee

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	1,920	\$76.75	\$2,455.92
VPS Grade 5	660	\$91.68	\$1,008.46
VPS Grade 6	180	\$118.98	\$356.94
Director	120	\$163.11	\$326.23
Commission	120	<i>Commissioner costs captured in overhead costs</i>	
Total	5,766		\$4,147.55

Calcutta sweepstakes

Calcutta sweepstakes are lotteries in which the winner is determined by the outcome of a contingency, such as the Melbourne Cup or AFL Brownlow Medal Count. A club may apply for a permit to conduct Calcutta sweepstakes. Applications for Calcutta sweepstakes permits are processed by the Office of Racing and issued by the Minister for Racing.

The Minister for Racing considers the following matters when approving a permit to conduct Calcutta sweepstakes:

- whether the club is conducted in good faith
- whether the club has contravened any law relating to gambling and betting
- the type of event for which the application relates.

The process for approving Calcutta sweepstakes is a relatively simple template-based process.

Table 45: Estimated net impact of fee changes for sports controlling body

Rank	Average time (mins)	Hourly rate (2025-26)	Estimated cost per application per rank
VPS Grade 4	45	\$52.70 ²⁷¹	\$39.53
VPS Grade 6	30	\$81.66	\$40.83
Total	75		\$80.36

²⁷¹ Calcutta sweepstakes are administered by the department (Office of Racing) and the remaining applications are administered by the Commission. The variance in the hourly rate of these VPS staff can be attributed to the Commission passing on the true costs of processing applications including indirect costs, whereas the department subsidises some of these costs.



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