



Committee Secretary
Joint Standing Committee on Treaties
(via email: jsct@aph.gov.au)

RWA Submission on the Council of Europe Convention on the Manipulation of Sports Competitions

Responsible Wagering Australia (**RWA**) is the peak body representing the Australian licensed online wagering industry. Our members include Australia's major online wagering service providers (**WSPs**): bet365, Betfair, Picklebet, PointsBet, Sportsbet, and Unibet. Our members have a strong track record of supporting sporting integrity, robust consumer protections, and safer gambling practices.

RWA welcomes the opportunity to provide input on the Council of Europe Convention on the Manipulation of Sports Competitions (**the Macolin Convention**). We strongly support Australia's ratification of this Convention, which will bolster efforts to combat match-fixing and illegal betting in line with international best practice. In particular, Article 11 outlines practical measures for governments to counter illegal sports betting through access restrictions, payment blocking, advertising limits and consumer awareness. These mechanisms are directly relevant given the current growth of illegal offshore wagering operators targeting Australians.

Illegal Offshore Wagering: A Growing Threat to Integrity

The illegal offshore gambling market targeting Australians has expanded alarmingly in recent years. Research (**attached**) by H2 Gambling Capital (**H2**) commissioned by RWA, and titled "*Illegal Offshore Gambling: A Growing Threat*" found that illegal offshore operators now account for **36 per cent of Australia's total online gambling market**. This offshore market has doubled in size since 2019 and is projected to reach \$5 billion annually within a few years. This growth undermines the integrity and financial sustainability of Australian sport and racing, and exposes consumers to environments with no oversight, no accountability, and no protections.

Crucially, bets placed offshore bypass Australia's integrity safeguards. Licensed WSPs share detailed betting data with regulators and sporting codes to help detect suspicious activity, whereas illegal offshore providers operate outside the Australian regulatory frameworks and without any data-sharing or transparency. Offshore providers often offer bet types that are highly susceptible to manipulation, posing an ongoing risk regardless of the strength of Australia's domestic regulations.

Wagering activity moving to illegal offshore operators also weakens the financial structures that help safeguard sport and racing. Product fee revenue that supports integrity systems, anti-corruption programs, and participation pathways is reduced, with H2 estimating that almost \$2.7 billion in taxes and industry fees will be lost to illegal offshore operators over the next five years, in addition to the \$2.2b lost over the previous five years.

The integrity threat posed by illegal offshore gambling extends beyond financial impacts. By operating outside Australia's current legal reach, illegal offshore operators provide an environment for match-fixers and organised crime. They offer anonymity and untraceable payment methods that can facilitate money laundering and corruption in sport.

International agencies have similarly warned of the risks posed by unregulated markets. The European Commission has noted that *"match-fixing is an international phenomenon and is often linked to gambling, with criminal networks exploiting unregulated gambling markets"*¹. Likewise, the United Nations Office on Drugs and Crime observed² that illegal sports betting platforms are increasingly used to launder criminal proceeds through payment channels like offshore accounts and cryptocurrencies. These findings underscore that illegal offshore wagering is not merely a consumer protection issue - it is a significant threat to the integrity of Australian sport and the broader regulatory system that underpins it.

Support for the Convention and Strengthening Enforcement

RWA strongly supports ratification of the Macolin Convention. Its focus on combating the manipulation of sports competitions - including through stronger measures against illegal sports betting - aligns closely with the challenges Australia currently faces. Article 11's requirement for Parties to take robust action against illegal wagering, including blocking access to illegal websites, restricting payments, preventing advertising, and raising public awareness, provides a practical and internationally consistent framework.

Ratifying the Convention will also enhance Australia's capacity to act against offshore integrity threats by enabling deeper cross-border cooperation, improved information-sharing, and more coordinated action against match-fixing networks. Given the global nature of modern betting markets, these tools are essential to strengthening Australia's integrity framework.

Conclusion

RWA commends the Government for progressing this treaty update. Ratification of the Macolin Convention will help ensure Australia's integrity systems remain contemporary, coordinated, and internationally aligned. With clear evidence of the growing harms posed by illegal offshore gambling, the Convention provides a timely and practical mechanism to strengthen protections for both consumers and Australian sport.

¹ European Commission, *Fighting match-fixing*, Brussels: European Commission, 4 February 2022

² United Nations Office on Drugs and Crime. *Global Report on Corruption in Sport*, Vienna: UNODC, December 2022, Chapter 9, "Illegal betting and sport."

We appreciate the Committee's consideration of these matters and would welcome the opportunity to assist further. Should you require any further information about these issues, please contact Mr Mike Websdane, Head of Policy and Operations, at

Yours sincerely,

Kai Cantwell
Chief Executive Officer

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Attached: *Illegal Offshore Gambling: A Growing Threat*