

22 March 2026

Dear Mr Ford

Explanatory Statement – Racing and Wagering Amendment Bill 2026 – Serial 59 (1)

The Legislation Scrutiny Committee is calling for submissions to its inquiry into the Racing and Wagering Amendment Bill 2026.

I make the following submission for consideration.

Distinction Between Wagering Commission and Racing NT Board – Scope and Consistency

From a wagering perspective, the policy intent underpinning Clause 11 (insert 19A to 19C) is to avoid both actual and perceived bias. This is appropriate given the breadth of the Commission's regulatory influence.

Wagering in Australia operates on a national basis, with licensed providers offering betting services across multiple jurisdictions, including on racing product originating throughout the country. In this context, the Commission's decisions and oversight functions can have implications beyond the Northern Territory, particularly where licensed operators provide services on interstate racing.

On that basis, a more expansive restriction is justifiable. I support the position that members of the Commission should not:

- hold wagering accounts; or
- own racing animals

across Australia, as this aligns with the need to maintain public confidence and avoid both real and perceived conflicts in a nationally interconnected wagering environment.

However, the same rationale does not logically extend to the eligibility requirements for Directors of the Racing NT Board.

The remit of Racing NT is clearly confined to the Northern Territory. Its regulatory, operational and integrity functions relate solely to racing conducted within that jurisdiction. Unlike the wagering environment, its influence does not extend nationally in a manner that would justify an Australia-wide restriction.

Despite this, the current provisions impose a blanket prohibition preventing Racing NT Directors from owning a racing animal anywhere in Australia.

This is disproportionate and inconsistent with the underlying policy intent.

If the objective is to manage conflicts of interest within the scope of an organisation's regulatory authority, then the restriction should be aligned to that scope. In the case of Racing NT:

- potential conflicts arise in relation to racing within the Northern Territory, where the Board exercises authority;
- ownership of racing animals in other jurisdictions does not create a direct or material conflict with Racing NT's functions.

Accordingly, the current approach:

- extends beyond what is necessary to manage risk;
- creates an inconsistency with the jurisdictional logic applied elsewhere in the Bill; and
- may unnecessarily limit the pool of suitably qualified and experienced Board candidates.

To my knowledge, no other Principal Racing Authority in Australia requires directors to divest ownership of thoroughbreds or greyhounds across all jurisdictions as a condition of appointment. Across Australian racing jurisdictions, potential conflicts are unusual but in any event are typically managed through disclosure, recusal and formal governance protocols.

The Racing NT prohibition on all animal ownership nationwide will exclude many of the most experienced and knowledgeable industry leaders from board consideration. I believe that it is counter-productive for Racing NT.

The 2025 Queensland Racing Review led by Matthew McGrath recommended that the ban on ownership by Board Members be removed and the Queensland Government subsequently changed legislation to allow people with ownership interests (including in Queensland) to sit on the board of Racing Queensland (demonstrated by the recent board appointments in March 2026).


A more proportionate and policy-consistent approach (still more strict than most jurisdictions, including the new Queensland rules) would be:

“Directors of Racing NT should be prohibited from owning, wholly or in part, a racing animal within the Northern Territory, but permitted to hold such interests in other Australian jurisdictions, subject to appropriate disclosure requirements.”

This approach maintains integrity where it is most relevant—within the Board's jurisdiction—while avoiding unnecessary and illogical restrictions beyond it.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

A black rectangular redaction box covering the signature of Nicolle Rantanen Reynolds.

Nicolle Rantanen Reynolds